



# Code of Conduct 2021



When Geneia LLC was established in 2012, we set out to develop products and services that would support personalized, patient-centered care, based on trusted relationships and built on systems and processes designed for optimal health outcomes. Whereas trust is at the core of what we do, to be truly successful, we recognize that the manner in which we conduct our business is as critical as the business itself. That is why integrity will always be a core value to be fully embraced.

Integrity is defined by Webster's dictionary as "a firm adherence to a code or standard of values." Integrity is something that every client and business partner demands. For that reason, integrity is embedded into our company's code of conduct, clearly identifying how we are all to act while conducting business on behalf of Geneia.

Many companies have a code of conduct, but it is those who actively adhere to the code, like the team members at Geneia, who establish a positive and deserving reputation as a company of integrity.

An active approach requires focus and a purposeful approach, as well as easy-to-access resources. As you handle your job responsibilities each day for Geneia, I encourage you to reference the code of conduct, especially when business ethics questions arise that you are uncertain how to handle. Should you not find the answers in the code of conduct, you can always speak with your supervisor or contact the company's compliance department for guidance.

I thank you in advance for your continued adherence to the code of conduct, and for the resulting great service you provide to our clients each and every day.

Regards,

A handwritten signature in white ink, reading "Heather Lavoie". The signature is fluid and cursive, with a long, sweeping underline.

Heather Lavoie  
Geneia, President & CEO

# Geneia's Vision | Personalized, Patient-Centered Care

We believe in the healing power of personalized, patient-centered care, where all patients have a meaningful and trusted relationship with a physician and care team; where healthcare systems are designed and function optimally in support of improved health; and where physicians and care teams are inspired and find joy in practice.

# Geneia's Mission | Alignment and Collaboration

We provide the technology, training, data and insights needed for health plans, hospitals, healthcare providers and employers to easily collaborate and align around shared values and goals that support personalized, patient-centered care and improved health.



# Table of Contents

<b>6</b>	Section 1: What does it mean to conduct business with integrity?
<b>7</b>	A. Commitment to Ethical Business Practices
<b>7</b>	B. Commitment to Protection of Employee, Client and Consumer Information
<b>8</b>	C. Responsibility of the Board of Managers and Company Officers
<b>8</b>	D. Disclosure Statement
<b>8</b>	E. Responsibility of External Entities
<b>9</b>	Section 2: How can I demonstrate integrity in the workplace?
<b>10</b>	A. Avoid and be Alert to Potential Conflicts of Interest
<b>10</b>	1. Personal Gain
<b>11</b>	2. Outside Activities
<b>11</b>	3. Use of Corporate Assets and Electronic Communication
<b>12</b>	4. Social Media
<b>13</b>	B. Ensure Accurate Reporting and Protection of Corporate Information
<b>13</b>	1. Proper Accounting
<b>13</b>	2. Client and Consumer Information
<b>14</b>	3. Other Proprietary and Confidential Information
<b>14</b>	4. Secure Data
<b>15</b>	5. Record Retention
<b>15</b>	6. Intellectual Property
<b>16</b>	7. Use of Software
<b>16</b>	C. Understand and Participate in the Company's Commitment to a Safe and Healthy Workplace
<b>16</b>	1. Workplace Access
<b>17</b>	2. Workplace Violence
<b>17</b>	3. Harassment/Sexual Harassment
<b>18</b>	4. Substance Abuse
<b>19</b>	5. The Environment
<b>20</b>	Section 3: How does integrity affect my business relationships outside the workplace?
<b>21</b>	A. Gifts and Entertainment
<b>21</b>	1. Giving and Receiving Gifts
<b>23</b>	B. Conference and Seminar Sponsorships/Travel Reimbursement

<b>23</b>	C. Participation in External Forums and Honoraria
<b>24</b>	1. Conferences/Seminars & External Forums: Potential Business-Related Scenarios and Guidelines
<b>25</b>	D. Contacts with Government Representatives
<b>26</b>	E. Kickbacks and Rebates
<b>26</b>	F. Reciprocity
<b>27</b>	G. Payments to Agents, Brokers and Consultants
<b>27</b>	H. Ethics of Competitive Intelligence
<b>28</b>	Section 4: What other laws or requirements should guide my commitment to integrity?
<b>29</b>	A. Fraud, Waste and Abuse
<b>32</b>	B. Ineligible Persons
<b>32</b>	C. Fair Competition and Antitrust Laws
<b>33</b>	D. Political Activity in Connection with Work
<b>33</b>	E. The Company's Commitment to Equal Opportunity/Affirmative Action
<b>33</b>	F. Responding to Government Investigations
<b>34</b>	G. Responding to Media Inquiries
<b>35</b>	Section 5: How does integrity affect my response to suspected misconduct or a code violation?
<b>36</b>	A. Report Suspected Violations
<b>36</b>	B. What to Expect When Submitting a Report
<b>36</b>	1. Non-Retaliation
<b>37</b>	2. Investigation
<b>37</b>	3. Corrective Action
<b>38</b>	4. Legal Reporting Requirements
<b>39</b>	C. Conclusion
<b>40</b>	Appendix A: Contact Information
<b>42</b>	Appendix B: Gifts and Entertainment
<b>45</b>	Frequently Asked Questions (FAQs)
<b>47</b>	Ethical Decision-Making Framework



Section 1:

## What does it mean to conduct business with integrity?

# Integrity

*Adherence to moral and ethical principles; soundness of moral character; and honesty.*

Acting with integrity means living the Geneia Code of Conduct, not just reading it. Keep your Code of Conduct accessible and refer to it when questions arise. You can access our Code of Conduct electronically from the company's website at [Geneia.com](http://Geneia.com).

## A. Commitment to Ethical Business Practices

At Geneia, we are committed to conducting business with integrity - being respectful, fair, and honest with our contracted clients, consumers, business partners, colleagues, competitors, the media, and the charitable and community organizations we sponsor. Our success depends on making and keeping this commitment to all of our Geneia stakeholders, not just today, but over the long term. This Code of Conduct (or "the Code") explains how we can showcase that integrity in everything we do. As employees, we have daily opportunities to model integrity as we carry out our responsibilities and interact with fellow team members in the company. With respect to Geneia business, the Code also governs members of the board of managers, consultants, vendors and third-party contractors (collectively, "Stakeholders") when they are acting on behalf of the Company.

As Geneia employees and Stakeholders, we are expected to follow both the spirit and the letter of the Code in all company matters. We all share a responsibility to:

- ▶ Understand the issues covered by the Code and other Geneia policies and procedures that apply to your job
- ▶ Observe all laws and regulations that apply to Geneia business
- ▶ Understand that abiding by the Code in your daily work activities is a mandatory part of your job
- ▶ Speak up if you have concerns about integrity or suspect violations of the law, the Code, or Geneia policies and procedures
- ▶ Not retaliate against an employee or Stakeholder who relates a good faith compliance concern or question
- ▶ Report retaliation if you believe it is occurring (See Section 5.B.1).

## B. Commitment to Protection of Employee, Client and Consumer Information

At Geneia, we are committed to protecting confidential information, including employee and member information. Geneia restricts access to confidential employee-related information only to those employees and vendors/service providers who need the data to provide services to our employee population. Reasonable caution is taken to maintain physical electronic, and procedural safeguards to protect this personal data. The safeguards are reviewed periodically by both independent and internal auditors.

We must protect employment related information. Verbal employment verification requests regarding current and former employees must be directed to human resources and will be limited to confirmation of employment dates and last position held.



### Think about it

**Q** Who are Geneia stakeholders?

**A** Our stakeholders include:

- Employees
- Clients
- Consumers
- Vendors
- Local and/or global communities
- Investors

Geneia stakeholders want to do business with people who meet their needs courteously and effectively, who assist them when they need help, and who they feel they can trust.

“

**Integrity without knowledge is weak and useless, and knowledge without integrity is dangerous and dreadful.**

Samuel Johnson  
*British Author, Lexicographer*

## Think about it



Additionally, Geneia is committed to protecting the Protected Health Information (PHI) of its clients including consumer information, as well as the PHI of its employees as members ensuring compliance with all state and federal laws.

**Q** Is our code applicable to people outside the company?

**A** Our code applies to everyone who conducts business for and with our company:

- Employees
- Board of Managers
- Consultants
- Third-party contractor

## C. Responsibility of Board of Managers and Company Officers

The Geneia board of managers (Board), in fulfilling its oversight responsibilities, reviews and approves business goals, strategies and objectives developed by senior management on a periodic basis. The Board also regularly monitors the business performance of the Company. Our company officers are responsible for the day-to-day operations of Geneia, including delegation of certain company responsibilities to employees, when appropriate. (For purposes of the Code of Conduct, the term “employee” is intended to also include the board of managers and officers.)

Because of their responsibilities, the Board Managers (Managers) and officers have a special relationship with Geneia, which is known as a “fiduciary” relationship. Under the law, a fiduciary is required to act with utmost good faith and to exercise his or her powers solely in the interest of Geneia and not in pursuit of self-interest. A fiduciary agrees to give diligent attention to the business of the company and to be faithful and honest in the discharge of the duties of the office. Because of this special relationship, adherence to our Code of Conduct by our board of managers and officers is of utmost importance, especially with respect to conflicts of interest.

## D. Disclosure Statement

Our Managers and officers are required to make decisions reasonably believed to be in the best interests of Geneia. They are required to avoid conflicts of interest and to disclose any potential conflict of interest as soon as the conflict is discovered. All Managers, officers, and employees are required to complete an initial and annual Disclosure Statement and Certification form, on which they identify any potential conflicts of interest and confirm their commitment to the protection and non-use of confidential data. They also certify that they have read and understand the Code and other important corporate policies and agree to abide by them. It is important to remember that individuals are under a continuing obligation to promptly report to the compliance department any updates to their Disclosure Statement and Certification form that arise throughout the year. This includes promptly reporting any new conflict of interest situations and details, or changes in circumstances regarding disclosures previously made.

## E. Responsibility of External Entities

Geneia provides clinical, analytic, consulting, and technical solutions for the healthcare industry.

Our Code of Conduct is available to our external entities, and upon request to their business partners. We further encourage them to adopt and follow a code that embraces a similar commitment to excellence.



Section 2:

## How can I demonstrate integrity in the workplace?

# Demonstrate

Demonstrating integrity in the workplace means conscientiously making the best possible decisions - every day, in every situation.

It means being aware of:

- ▶ Disclosing and avoiding potential conflict of interest situations.
- ▶ Protecting Geneia confidential and proprietary information.
- ▶ Safeguarding all PHI in our possession.
- ▶ Using corporate assets responsibly.
- ▶ Making sure reported figures and statistics are factual.
- ▶ Paying attention to how we keep and/or discard Geneia client or consumer information.

In short, we should do everything we can to maintain a safe and healthy work environment.

## Think about it



### A. Avoid and be Alert to Potential Conflicts of Interest

**Q** Your spouse is employed by a company that believes it can supply higher quality and less expensive supplies to our company than the current vendor. Can we deal with that company?

**A** Yes, as long as you stay out of the entire vendor selection process, the company will be able to reach an independent judgment. Always notify your management or the compliance department of any close relationship you have with any of our vendors or other business partners. Additionally, if your spouse's company is selected, be sure to include this on subsequent annual disclosure statements.

At Geneia, we are expected to use our best efforts to ensure our company's success, which includes doing everything we can to maintain Geneia's good reputation. This includes avoiding any activity that could create a conflict between our personal interests and the best interests of Geneia. This rule applies equally to every employee of the organization, regardless of role. A conflict of interest can occur when you, or a close relative (spouse, child, parent, sibling, step-relative, in-law, or any other household member), have an outside personal or financial interest that interferes with your objectivity in performing your job duties at Geneia. However, an actual conflict of interest does not need to exist for the Code of Conduct to apply. We should also avoid activities that could create even the appearance of a conflict of interest.

Disclosure to management (supervisor, manager, director, or anyone else in your chain-of-command) and the compliance department, should occur before taking any action in a situation that might raise a conflict of interest question.

The areas discussed below often involve potential conflicts of interest situations. Disclosure should occur promptly when the situation arises.

#### 1. Personal Gain

- a. Outside Connections: As employees, we should not participate in any transaction, situation, or employment where we or a close relative stand to gain personally or financially to the detriment of Geneia. For example:
  - Being involved in a decision to do business with a company in which you have a financial interest, or for which a spouse or other family member works
  - Receiving personal gain from any commercial opportunities discovered in the course of your job with Geneia
  - Accepting an outside position that conflicts, or appears to conflict, with your job duties at Geneia
  - Consulting for or holding a second job with a competitor, supplier, client, or consumer
  - Starting a competing business or pursuing any commercial opportunity that would appear to interfere with the best interests of Geneia or any of its subsidiaries
  - Holding an investment in a business that competes directly with

Geneia, except if the investment is not greater than ten percent (10%) of your net worth or your ownership interest does not allow you to influence or control a decision of the company in which you made the investment

- Hiring or having a reporting relationship, or other position of influence, with a spouse, relative, domestic partner, or someone with whom you share a significant relationship
- Accepting an expensive gift from a vendor with whom Geneia has a business relationship

If you believe that a conflict of interest exists, or even the appearance of one, you must disclose it either to management or to the compliance department.

- b. Solicitation: The potential for personal gain at work could also occur through an employee's solicitation of co-workers, e.g., taking orders for party-plan products, promoting personal side businesses. Geneia has strict guidelines about solicitation, generally prohibiting it at work. However, because Geneia is strongly committed to our local communities, employees are permitted to support nonprofit organizations within certain guidelines: 1) passive solicitation only, 2) within our own departments, 3) with management approval.

## 2. Outside Activities

Geneia values and supports our employees' involvement in community and personal activities. However, our outside activities, including other employment, should not interfere, either directly or indirectly, with our work performance or in any way negatively impact Geneia's reputation in the community.

## 3. Use of Corporate Assets and Electronic Communication

All systems of electronic communications and other corporate assets (such as supplies, computers, telephones, or other equipment) are provided solely for business use by employees on behalf of Geneia. Corporate assets must not be used for personal reasons, either at work or away from work, except as approved by management for minimal use (e.g., during break and lunch periods). As important, we must always remember good etiquette and professionalism are important aspects of email and all other forms of electronic communication.

Corporate assets, email, and the Internet are controlled by Geneia and are subject to audit. Any limited personal use should not:



## Think about it

**Q** You work in the clinical care management and outreach department. You've been approached by a client to build an outreach program and provide consultative services outside of work. Is it acceptable to contract with the client for these services?

**A** No. You have a financial interest to provide these services to the client. You stand to gain financially. You should disclose this conflict to management so that steps can be taken to resolve this. You can direct the client to the sales and product management team to determine if Geneia can further service this client's request.

## Think about it



**Q** What are corporate assets?

**A** Corporate assets include, but are not limited to:

- Equipment
- Inventory
- Funds
- Supplies
- Computer systems
- Company data
- Electronic communication systems
- Business strategies and plans
- Intellectual property rights
- Other intangibles, such as an employee's time, status, or position with Geneia

- ▶ Interfere with normal business activities
- ▶ Involve solicitation
- ▶ Be associated with any personal for-profit business activity
- ▶ Present personal opinion that could be construed as representing approved corporate policy or opinion, including personal websites, blogs, and social networking environments (e.g., Facebook, Instagram, LinkedIn, or Twitter).
- ▶ Involve pornographic, violent, or other offensive materials

Remember, management may periodically access any employee's corporate electronic communications, without consent and without prior notice. Inappropriate use of corporate funds and assets may result in corrective action, up to and including termination of employment.

#### 4. Social Media

Employees' use of social media should be consistent with all Geneia policies, as well as those included in Employee Disclosure Statement and Certification forms.

Equipment and/or work time should not be used to engage in personal social media activities. Geneia reserves the right to monitor all work-related Internet/social media activity. The use of corporate passwords for security does not guarantee confidentiality. Be mindful that postings may become public.

Geneia employees may not post on social media anything in the name of Geneia, or anything that could reasonably be attributed as approved by Geneia, without prior authorization from senior management. Geneia has a defined department within the company, marketing, that is authorized to communicate on behalf of the organization.

“

**Ethics is knowing the difference between what you have a right to do, and what is right to do.**

Potter Stewart

## B. Ensure Accurate Reporting and Protection of Corporate Information

### 1. Proper Accounting

Geneia deals with important financial information every day, and maintains internal controls to verify that transactions are recorded in accordance with applicable laws and corporate policies. Geneia relies on all of us to be complete, accurate, and honest in recording, preparing, and reporting information. Improperly altering or destroying financial records or expense records is prohibited. With the exception of travel advances, Geneia may not extend or maintain credit, nor arrange for or renew an extension of credit in the form of a personal loan to or for any employee.

No secret or unrecorded funds or assets may be created or maintained for any purpose. Making false or fictitious entries in the records of Geneia with respect to any transaction or the disposition of corporate assets is prohibited, as is any employee's participation in such transactions. In order to ensure that the financial statements of Geneia fully and fairly disclose the financial condition of the company and are not misleading, you (and/or anyone acting under your direction) are prohibited from taking any action which would improperly influence, coerce, manipulate, or mislead: (i) any independent public or certified accountant engaged in the performance of an audit of the financial statements of Geneia, or (ii) any member of the internal audit department who is performing an internal audit or investigation.

We must cooperate fully in any audit or investigation being conducted. Any falsification or attempts to coerce, manipulate, or mislead may result in corrective action up to and including termination.

### 2. Client and Consumer Information

Geneia sends, receives, uses, and maintains large volumes of consumer information. Our clients and consumers trust us with some of their most sensitive information. It is our obligation to diligently protect the privacy and the security of that information. Most consumer information is considered PHI, whether used alone or in connection with other medical information, such as diagnoses, procedure codes, and medical records, and includes, but is not limited to:



## Think about it

**Q** While traveling on Geneia business, you take a free shuttle from the hotel to the airport. On your expense report, however, you include a \$25 taxi charge (what it would have cost if there had not been a free hotel shuttle.) Per Geneia policy, this minimal charge does not require a receipt. Is this appropriate?

**A** No. Seeking reimbursement for expenses that were not incurred is abuse of Geneia funds, and prohibited by corporate policy.

## Think about it



- ▶ Name
- ▶ Address
- ▶ Social Security Number
- ▶ Contract Number
- ▶ Date of Birth
- ▶ Date of Service

**Q** What types of information are considered confidential and proprietary?

**A** Examples of confidential/proprietary information include:

- Client and consumer information
- Provider utilization
- Company product
- Consumer lists
- Corporate strategies
- Personnel information (including wage and performance data)
- Financial information
- Client contracts
- Sales and marketing plans
- Planned advertising or other corporate promotions
- Vendor and client pricing

As employees of Geneia, we are each responsible for ensuring that PHI is safeguarded, not only in the company's computer systems and filing cabinets, but in every way that we use and share it. This includes verbal conversations in the hallway or on the telephone, information printed out, and information sent back and forth by email, fax, regular mail, file transfers, mobile devices, etc. Questions about any privacy issue related to PHI should be directed to the privacy office.

### 3. Other Proprietary and Confidential Information

In addition to consumer and client information, Geneia receives and generates a large amount of information that is confidential and/or proprietary. This includes any company-specific information that is not intended for public knowledge, whether specific to Geneia or to companies with whom we conduct business.

As employees, we have an obligation, both during and after employment, to protect the confidential and proprietary information of Geneia, our clients, consumers, and our vendors. Confidential or proprietary information should be disclosed only to employees who have a specific business need to know it.

It should be disclosed to outside parties only in accordance with Geneia policies, confidentiality agreements reviewed by the legal department, or as required by a valid court order that has been provided to the legal department.

In order to avoid inadvertent disclosures of any confidential or proprietary information of Geneia, we must be especially cautious about discussing confidential information in social settings. One innocent disclosure may be enough to damage the reputation and competitive position of Geneia with our consumers or violate the law.

### 4. Secure Data

Much of Geneia's data resides in an electronic format where a secure login is required to gain access. All employees are expected to use user IDs, passwords/pass phrases and security codes responsibly, which includes not sharing them with anyone, and not facilitating unauthorized access to Geneia systems. It is equally important to securely transmit

and place data in appropriately secured areas that are protected by Geneia's security mechanisms. Company data must never be placed on non company assets, such as personal mobile devices or home computers without the use of IT-approved technical controls. Geneia business is to be conducted only through company-controlled resources where appropriate data protection and logging are available (company email, fax, or file transmission). Employees must never send or store Geneia's data in personal email accounts, such as Gmail or Yahoo, or personal cloud storage platforms, such as Google Docs or Dropbox, or on other personal media devices, such as thumb drives or CDs.

## 5. Record Retention

Geneia records, including electronic information, are maintained and discarded in accordance with the company's record retention policy and procedures, which are based on federal and state laws and regulations. Failure to maintain Geneia records in accordance with these requirements may result in fines and penalties against the company. Documents that are required to be retained are to be maintained in their original state.

Documents may not be revised or modified once they have been identified for retention. Destruction of any information relating to a pending lawsuit or government audit could result in serious consequences for you and Geneia.

If there is uncertainty about whether documents may be destroyed, consult with management, the records manager, or the legal or compliance department.

## 6. Intellectual Property

Intellectual property generally consists of knowledge or creative ideas that have a monetary value and/or are protected under copyright, patent, service mark, trademark, or trade secret laws.

Geneia protects its own intellectual property. Geneia also respects, and often has the legal obligation to protect, the intellectual property of others, such as outside vendors. Contact vendor management or the legal department with any questions about using licensed property, such as software or publications. Any suspected improper use of intellectual property should be reported to management or the compliance department.



## Think about it

**Q** You are leaving for vacation and have some critical work that needs to be completed. Can you give your password to your manager so he can finish your project and make the deadline?

**A** No. You may not share your system user name or password with anyone else, including your manager. If your manager or another coworker agrees to finish your project, there are Geneia-approved methods to provide them with access through their own login. You should contact Desktop Services at extension 7200 for more details.

**Q** What does intellectual property look like?

**A** Examples of intellectual property include, but are not limited to:

- Brand names
- Discoveries
- Inventions
- Software
- Registered designs
- Works of an artistic, literary, or musical nature

## Think about it



**Q** What are copyright law infringements?

**A** Some examples of activities that may be deemed copyright law infringements include:

- Downloading information electronically where copyrights exist
- Installing software on more computers than allowed by license
- Distributing articles or newsletters that are copyrighted to others outside Geneia
- Forwarding electronic subscription materials to others who have not paid for the subscription

### 7. Use of Software

When Geneia purchases software, it generally does not own the software itself. Instead, we purchase a license to use the software in accordance with the vendor's restrictions. For example, using the software only for Geneia's internal business purposes and/or limiting the number of copies that can be made. Unauthorized copies of any software could result in civil and criminal penalties.

Employees may never install, download, or copy any software, including any from the Internet, unless the software is specifically approved or appropriately licensed to Geneia. Furthermore, copying a software application to more than one company computer or to your personal computer is generally prohibited unless Geneia has granted you specific permission to do so. Any improper use of software licenses should be reported to management or the compliance department.

## C. Understand and Participate in the Company's Commitment to a Safe and Healthy Workplace

Geneia recognizes that its greatest and most valuable asset is its workforce and is committed to making every effort to provide employees with a safe working environment. Geneia policy expects that we comply with all safety and health-related laws and regulations. Issues of safety are especially important in the following five areas.

### 1. Workplace Access

It is every employee's responsibility to assist in keeping the workplace safe and secure. This begins by always displaying our employee badges

while at work, and being aware of anyone who is not displaying a badge (employee, contractor, or visitor). Visitors must be escorted at all times by their host employee. An individual without a badge must be escorted to the front desk to obtain one.

Access to Geneia facilities and restricted areas requires employees to show or swipe their own access badge. As a courtesy, you can hold open a perimeter door for an individual who is displaying an authorized badge. However, if a

**“ Have the courage to say no. Have the courage to face the truth. Do the right thing because it is right. These are the magic keys to living your life with integrity.**

W. Clement Stone  
Founder of Combined Insurance Co.

badge is not present, the individual must be escorted to the front desk. For restricted areas, such as a data center, you should not allow anyone to follow you through any internal secure door. Each individual must present his/her own access badge. If an individual must enter a restricted area without authorized access, he/she must sign a log book and be escorted at all times.

## 2. Workplace Violence

Geneia strictly prohibits any act or threat of violence by an employee against another employee, client, consumer, or any other person on Geneia property or while conducting company business. Prohibited conduct includes, but is not limited to:

- ▶ Assaults
- ▶ Harassment
- ▶ Physical, verbal, or written intimidation
- ▶ Possession of weapons, including guns, knives, explosives, or the like, which are strictly prohibited on Geneia property, in company vehicles, or anywhere else while on Geneia business

Such conduct may result in immediate termination. In addition, threats of violence by non-employees, such as disgruntled consumers or other persons, must be reported immediately to management, human resources, or operations.

## 3. Harassment/Sexual Harassment

Geneia does not tolerate unlawful harassment or sexual harassment by or against any employee or other individual who represents or serves Geneia.

Harassment is broadly defined as any unwelcome or offensive conduct committed by coworkers, vendors, consumers, or other individuals.

Discriminatory harassment involves unwelcome or offensive conduct with regard to another individual's race, color, sex, sexual orientation, gender, gender identity, religion, national origin, age, disability, or any other basis protected by law.

Examples of harassment include, but are not limited to:

- ▶ Derogatory nicknames, comments or slurs, or gestures
- ▶ Derogatory posters, screen savers, or cartoons
- ▶ Assault, intentional blocking, or interfering with normal conduct
- ▶ Inappropriate words, labels, or symbols used as IDs, passwords, computer sign-offs, or greetings



## Think about it

**Q** You approach a "swipe access" door, and realize that someone else is close behind you. As you swipe your badge and open the door, she enters behind you. You ask to see her badge. As she fumbles in her purse, she gets agitated and mumbles something about you being the "badge police." She then states that she must have left it at home, and proceeds to walk away. You recognize her as an employee, and would rather not create a scene. What should you do?

**A** Every employee is required to display his/her badge upon entering the building, or go directly to the reception desk to get a temporary one-day pass. Remind her that the "piggyback" policy is for everyone's safety. By entering on your badge, she has made it your responsibility to ensure she gets her one-day pass. Walk with her to the reception desk.

## Think about it



**Q** One of your co-workers has a habit of telling questionable ethnic or “off-color” jokes. This offends you and others in your group. How can you get this to stop?

**A** Geneia policy prohibits this type of behavior. You have the option of discussing your feelings with the person telling the joke. If you are uncomfortable doing so, you should consult with management, the human resources department, or the compliance department. You may also call the compliance hotline.

- ▶ Threats, intimidation, bullying, or other forms of harassment, which have the effect of disrupting an employee’s work environment

Sexual harassment generally exists in two forms: 1) requests for sexual favors in exchange for continuation of employment, or for taking or not taking other job-related actions, such as promotions or corrective action; and 2) a sexually offensive working environment.

Examples of sexual harassment include, but are not limited to:

- ▶ Unwelcome sexual advances, propositions, or requests for sexual favors
- ▶ Unwanted physical contact including touching, rubbing, or brushing up against another
- ▶ Verbal harassment such as suggestive comments, sexual innuendos, or jokes of a sexual nature
- ▶ Nonverbal conduct such as obscene gestures, leering, whistling, or displaying or circulation of sexually suggestive objects or pictures
- ▶ Aggressive, intimidating, or “bullying” conduct directed toward someone because of his or her gender, even if not sexual in nature

If you experience or observe harassment or sexual harassment in the workplace, you are required to report the incident promptly to management, human resources, or the compliance department.

#### 4. Substance Abuse

Geneia strictly prohibits the possession, use, or distribution of illegal drugs or alcohol on company property, or while conducting Geneia business. An employee may not report to work or remain at work if, in the opinion of management, job performance is impaired because of the influence of legal or illegal drugs or alcohol. During certain approved business-related activities, however, conservative consumption of alcohol on company property is permitted, e.g., Geneia-sponsored dinner meetings or banquets.

“

**We do not inherit the earth from our ancestors, we borrow it from our children.**

Proverb

## 5. The Environment

Geneia is committed to making environmentally sound choices, and we ask all employees to do the same. Geneia supports recycling efforts, and incorporates energy-saving and water-saving devices in our buildings. Employees should each be mindful of what they use and how they use it and look for opportunities to minimize, reuse, and recycle waste at our facilities. Each of us should consider the impact on the environment before printing documents, and help Geneia conserve energy by turning off computers, monitors, and unnecessary lighting after business hours.

In the event that employees print documents - while in the office using designated printers - that contain confidential information or PHI, they are required to appropriately dispose of it by shredding it or placing it in the approved secure containers or shredding them if working remotely. It is never acceptable to place documents of this nature in the gray bins, trash cans, or the blue bins located in the office used for regular recyclable materials.

“

**The environment and the economy are really both sides of the same coin. If we cannot sustain the environment, we cannot sustain ourselves.**

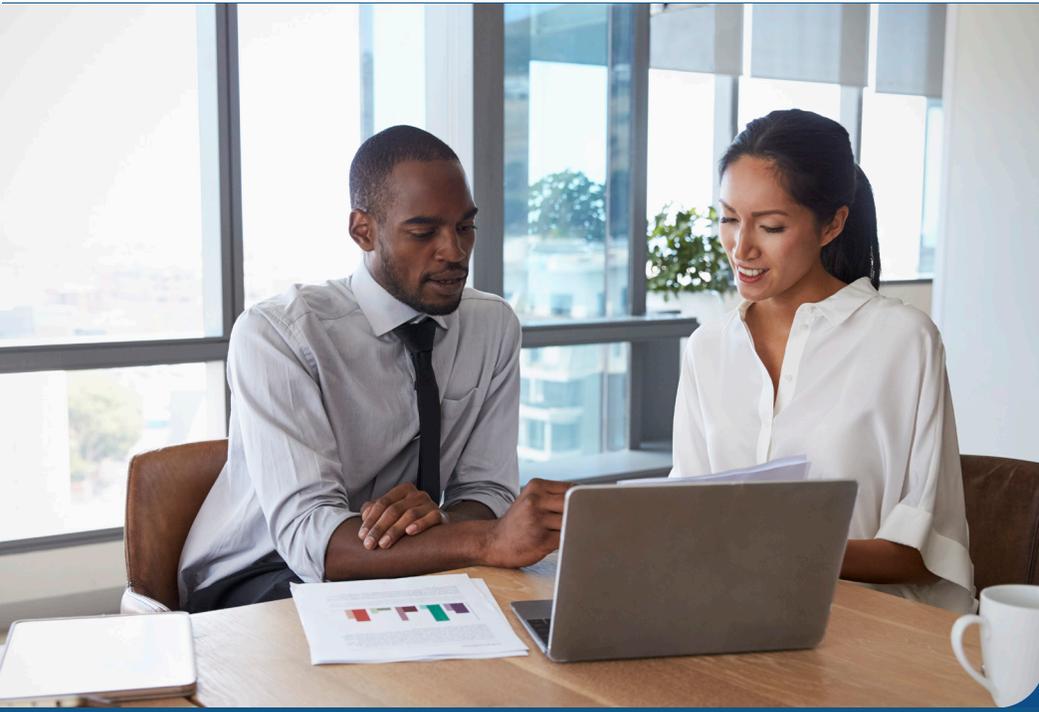
Wangari Maathai



## Think about it

**Q** A coworker in a neighboring cubical carries on frequent conversations about her weekend escapades with her boyfriend, often involving graphic sexual details. The walls give a false sense of privacy, but you are uncomfortable with what you hear. You have a good relationship with your coworker and don't want to mess it up. What can you do?

**A** It is admirable that you don't want to jeopardize your good working relationship, but this is clearly an inappropriate workplace discussion that affects not only you, but others who may also overhear. You should find a way to address it professionally, either by talking with the coworker, or by reporting it to management, human resources, or the compliance department. If you attempt to address it or report it, and it continues, you need to report it again. Like all employees, your coworker needs to accept her responsibility in maintaining a non-offensive work environment.



Section 3:

**How does integrity affect my business relationships outside the workplace?**

# Business Relationships

As employees, we are expected to foster courteous and productive working relationships with Geneia vendors, clients, and consumers, and abide by the terms of our contracts.

This includes:

- ▶ Being fair and honest,
- ▶ Providing accurate information and representations,
- ▶ Protecting a vendor's, a client's, or a consumer's confidential and proprietary information,
- ▶ Following Geneia policy when giving or receiving gifts and entertainment.

## A. Gifts and Entertainment

Gifts and entertainment, both to and from outside entities, raise many questions. Because Geneia policy requires handling gifts and entertainment differently, we start by defining them.

A gift is any item, activity, privilege, etc., that is given from one person or group to another with the intention that the recipient will use the gift at their personal discretion and within a time-frame of their choosing.

Entertainment, which may include meals, also involves giving and receiving an activity or privilege, but with the intent that the gift-giver will accompany or host the recipient(s). Entertainment does not necessarily have the same monetary restrictions as gifts, but see Appendix B for guidelines and examples.

Any gift given or received, or entertainment hosted or attended, must comply with law, customary business practices, and the Code.

In certain instances, government reporting may be required. For example, entertainment or gifts given to labor unions or labor representatives must be carefully documented, as reporting to the Department of Labor or other government agency may be required. Gifts and entertainment provided by the government affairs department are also guided by both state and federal laws. Providing meals or entertainment to federal employees is strictly prohibited under federal law.

The following sections provide helpful guidance for employees when questions arise about appropriate business-related gifts or entertainment.

### 1. Giving and Receiving Gifts

Giving and receiving business gifts have long been considered part of good business etiquette. However, gifts and entertainment, both to and from outside entities, raise many questions. We need to make sure that our decisions are not influenced by favoritism or other inappropriate motives. The safest course of action is not to give or receive any gifts at all. Sometimes, circumstances may arise when that is not possible. If you must give or receive a gift, inexpensive or promotional items are appropriate if the item is widely available to others and if the exchange is legal. Even inexpensive gifts should not be given or accepted if they are intended as, or could be perceived to be, an attempt to influence business decisions or otherwise illegal or inappropriate behavior. Ask your compliance officer for



## Think about it

**Q** An outside company sent you a gift basket of assorted chocolates and other edible items at Christmas. May you keep it?

**A** Yes, you may keep it, as long as it falls within the Geneia gift policy guidelines. Unsolicited and infrequent gifts are appropriate if the market value is equal to or less than \$100, or if the "per person" value is equal to or less than \$100 when shared with other employees in your department.

## Think about it



help any time you are unsure about giving or receiving a gift. For guidance and examples of the different gifts and entertainment guidelines, see *Appendix A*.

**Q** A vendor has invited you to a trade conference in Florida. The vendor will pay for airline, hotel, and meals. Your department is seriously looking at a new product currently being marketed by this vendor. This is a great opportunity to get the latest information at a big savings for Geneia. May you go?

**A** You should avoid even the appearance that your future relations with this vendor might be influenced by this trip. If there is a suitable business reason to go to the conference, you may be able to attend if Geneia pays your expenses. This should be discussed in detail with your management, or as necessary, with the compliance department. If approved, it would be treated as any other valid Geneia-paid business trip.

Employees may never solicit a gift, either directly or indirectly, from an individual or entity with which Geneia conducts business. However, from time to time a person or company may choose to offer a gift. While conducting Geneia business, non-monetary items may be accepted, up to a maximum of \$100 value per item per calendar year, from any external individual/entity. For specific guidance on what constitutes a non-monetary gift, see *Appendix B*.

Cash and cash-equivalent gifts may never be accepted for personal use. Employees who receive cash or cash-equivalent gifts from an external business-related individual or entity have two options:

- ▶ **Decline:** You may always politely decline the gift. Please contact the compliance department for a copy of the "Gift Gratuity Return Letter Template."
- ▶ **Donate:** Because Geneia cares deeply about the needs of our communities, you may donate the gift to a corporately-sponsored charitable organization of your choice, as coordinated by the compliance department, through an established and document-able process. It is preferable that checks are made payable to Geneia or that a cash gift is contributed directly to a charity by the vendor providing the gift. The compliance department will provide additional guidance, as necessary, for checks made payable to employees and for gift cards. Because cash or cash-equivalent gifts are transferred to a charity, disclosure to the government for tax purposes is not required.

Gift cards are considered cash equivalent and therefore may not be accepted for personal use. If a gift card has been received, the employee should coordinate with the compliance department to submit either the gift card or a personal check for the value of the gift card and make payable to Geneia.

There are specific regulatory requirements regarding gifts to government and commercial enrollees and employees, including possible reporting requirements. The guidelines are found in *Appendix B*.

On occasion, it may be acceptable to host or attend a celebratory dinner or function with business partners to mark the end of a project or a deal. However, the following guidelines apply:

- ▶ Offered on an infrequent basis
- ▶ Reasonable and appropriate to the occasion
- ▶ Compliant with department or corporate policies and state or federal laws and regulations
- ▶ Pre-approved by management

If you use a Geneia supplier or contractor for personal purposes, you must pay full market value for the services and materials. In most instances, you may not accept discounts or preferential treatment offered to you because of your position at Geneia. In certain instances, a discount or preferential treatment may be acceptable if the same treatment is offered openly to all Geneia associates.

## B. Conference and Seminar Sponsorships/ Travel Reimbursement

In most cases, Geneia prohibits any outside entity or individual from paying for an employee's expenses to attend a conference, seminar or other similar event, including those who do business or seek to do business with Geneia. This includes discounted conference fees or reimbursement for travel, meals, or lodging expenses; as well as offers of gifts or prizes valued at more than \$100. An exception may be made when the reimbursement is part of the terms of a signed agreement that Geneia has with the outside entity.

Geneia will reimburse an employee for attendance at a conference or seminar if there is a business reason for the employee to attend, the employee has received prior approval from management, and the purpose and cost of the event is within Geneia guidelines or budget.

## C. Participation in External Forums and Honoraria

There may be occasions when an outside group or organization may solicit the expertise of an employee, for example, a professional presentation; participation on a panel, focus group, or advisory council; submission of a written paper; membership on a working board or other such activities related to our work for Geneia (e.g., external forums). With the approval of management, Geneia encourages participation in appropriate corporate

“

**What you get free costs too much.**

Jean Anouilh

## Think about it



**Q** You are a member of a professional organization. You have been asked to facilitate a round table of your professional colleagues. The organization is offering you overnight lodging prior to the meeting and an honorarium of \$100. Should you accept their offer?

**A** Geneia applauds employees who are honored by such a request. However, there are some limitations on the types of remunerations you may accept for this kind of engagement. With management approval, trip expenses may be covered by the professional organization. However, the honorarium you have been offered can only be accepted if it is disclosed to the compliance department and transferred to a corporate-sponsored charitable organization as outlined in the *Acceptable Cash Gifts* section. A preferred option would be that you ask whether your professional organization could donate the honorarium directly to a charity on your behalf.

employment or community-related forums. Compensation for these types of activities is commonly referred to as honoraria (a nominal payment in recognition of acts of professional services for which custom or propriety does not allow a price to be set).

At Geneia, we may not accept honoraria for personal use, for activities that relate to our duties or representation of the company. If offered, we may accept an honorarium payment, but only under the condition that it is donated to a charitable organization as outlined in this Code. See Section 3.A.1.

However, Geneia does allow reasonable reimbursement from a sponsoring organization for registration, travel, lodging and/or food expenses incurred by the participating employee. In these instances, any reimbursement for expenses associated with our participation in external forums must be approved by management in advance.

For appearances, presentations, speeches or written works that involve outside personal interests i.e., knowledge or expertise unrelated to our duties with or representation of Geneia, employees may personally accept honoraria. In such circumstances, the employee is responsible for all expenses related to the activity, and any arrangements for honoraria. Additionally, the activities must be performed on personal time.

Questions about honoraria should be directed to management or the compliance department.

### 1. **Conferences/Seminars and External Forums: Potential Business-Related Scenarios and Guidelines**

- ▶ If you are a participant in a business-related conference or seminar that has been approved by Geneia management, all registration, travel, lodging and meal costs must be paid by Geneia.
- ▶ From time to time, our Geneia employees may serve as speakers and panelists at conferences and seminars at local and national levels. If you are a speaker or panelist at a management-approved business-related conference or seminar, you may accept full or partial reimbursement for your registration, travel, lodging and/or food expenses if offered, to all speakers in the event from the organization or underwriter sponsoring the event provided the expenses are a reasonable amount. This is true even if you attend additional sessions at the conference as a participant only.

- ▶ Sometimes our employees are invited to attend advisory councils or forums as subject matter participants in order to help the organization sponsoring the council or forum improve its products or services. If you are invited to participate at such an event in your role as a Geneia employee in order to provide industry, subject-matter, or best-practice insight and feedback, you may, with prior management approval, accept reasonable full or partial reimbursement for your registration, travel, lodging, and/or food expenses as long as such reimbursement is offered to all participants. This is because the sponsoring organization is receiving the benefit of your expertise and knowledge.



## Think about it

Important to remember: While you may accept reimbursement in situations like those above, as a Geneia employee, it is unacceptable to solicit or demand reimbursement when it has not been offered. Further, the compliance department must review and approve any unique situations to determine if reimbursement is appropriate.

Additionally, as a Geneia employee, you may not accept a cash or cash-equivalent honorarium or payment for your services, if one is offered. Please politely decline the honorarium or allow a donation to be made directly to a charity instead. Alternatively, you must follow the guidelines in Section 3.A.1 of this Code, regarding the receipt of cash gifts.

## D. Contacts with Government Representatives

Federal and state laws and regulations govern Geneia's contacts with elected officials and government employees (collectively "government representatives"), as well as any member of a government representative's immediate family. Employees should consult the legal department or government affairs department on issues that involve contacts with federal, state, or local government representatives.

Only those chosen by Geneia for government relations or legal work can formulate and express the company's views on legislation, regulations, or government action. Other employees may communicate Geneia views only with specific guidance from government affairs.

Certain prohibitions or restrictions limit what we can offer or give by way of gifts, business courtesies, meals, or entertainment to government representatives. To ensure compliance with government guidelines, all questions should be directed to the legal department or government affairs department.

**Q** A large behavioral health agency, seeking to enhance services and resources for their clients has invited Geneia to participate in a two-day consortium, where clients, providers, and insurance companies will share insights and discuss strategies to assist the agency in meeting its objectives. You were contacted to represent our company. The agency is offering to pay overnight lodging and meals for those who attend. Is this type of compensation permitted?

**A** Yes, Geneia is being asked to provide expertise to the hosting agency and for the public at large. This gathering is not for training or sales purposes, which would benefit the participants and their companies. It is appropriate for the agency to compensate for the knowledge they receive by covering travel-related expenses of the participants.

## Think about it



### E. Kickbacks and Rebates

**Q** Geneia is sending out bids to have the driveway resurfaced. One of the potential vendors lets Geneia's purchasing manager know that if his company wins the contract, he will resurface the manager's driveway at home at no cost. The cost to Geneia would be the same, regardless of whether the manager's driveway is also resurfaced. Is this okay?

**A** No. The offer to resurface the manager's driveway may constitute an illegal kickback. The manager would be receiving a personal benefit from the business relationship, not to mention the fact that his or her objectivity in evaluating the proposals submitted by all the vendors may be impaired.

Employees must not accept kickbacks (the return of a certain percentage of the purchase price, usually the result of a secret agreement) or rebates from the purchase or sale of any Geneia goods or services. This prohibition applies to employees' immediate family members, as well. Kickbacks and rebates are not limited to cash or credit. If you or a family member stands to experience any personal gain from the deal, it is generally prohibited. Further, no payment or offer of benefit of any kind, other than those promotional items included in Geneia's marketing policies, which comply with the standards of the Code, may be made to a consumer or client or potential consumer or client, as an inducement to purchase or remain enrolled in any of our products.

Not only are kickbacks and rebates prohibited as provided under the Code, but strict federal laws apply as well. The federal Anti-Kickback Act prohibits "the direct or indirect offering, giving, soliciting, or accepting of any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind to improperly obtain or reward favorable treatment under any government contract." This includes kickbacks and rebates to or from a client, vendor, provider, or government agency, or their employees, in connection with favorable treatment under a federal healthcare program such as Medicare. By law, Geneia is required to report violations of the Anti-Kickback Act to the government, and it is imperative that all suspected violations are reported to the compliance department. If you violate the Anti-Kickback Act or other anti-fraud laws, you may be subject to corrective action up to and including termination.

Questions about whether a benefit constitutes a kickback or a rebate should be directed to management, the legal department, and the compliance department.

### F. Reciprocity

In many instances, Geneia buys products and services from clients or vendors who buy Geneia services, or might, in the future. It is appropriate for Geneia to purchase from these clients or vendors, provided their prices or bids are competitive with clients or vendors who do not purchase our products. However, it is not appropriate for an entity to be pressured into buying our services as a condition of doing business with Geneia.

## G. Payments to Agents, Brokers and Consultants

It is not unusual for Geneia to enter into agreements with agents, brokers, or consultants to carry out business requirements. These agreements should be in writing and should be approved by appropriate management and submitted through the contract review process, when applicable, or other legal review. The agreements should clearly and accurately state the services to be performed, the basis for payment, and the rate of payment or applicable fee and should conform to all applicable federal and state laws and regulations. Contact the legal department or vendor management if you have any questions about preparing or executing a contract.

## H. Ethics of Competitive Intelligence

Gathering information about competitors in a legally appropriate manner is quite common and reasonable in the business world, and Geneia is committed to conducting such activities with the utmost integrity. This commitment includes, but is not limited to:

- ▶ Gathering competitive information only from proper sources, such as journal and magazine articles, advertisements, public presentations, publicly posted/distributed documents and brochures; surveys conducted by consultants; and/or communications with our broker community and other individuals who can provide information legally and ethically.
- ▶ Avoiding improper means of obtaining competitive information, such as through theft, bribery, or improper infiltration.
- ▶ Accepting competitive information only when its receipt and use is lawful and appropriate.

When in doubt, information gatherers should contact the legal department or the compliance department for guidance before obtaining or using the information.

**“ It takes 20 years to build a reputation, and five minutes to ruin it. If you think about that, you’ll do things differently.**

Warren Buffet



## Think about it

**Q** A long-time software vendor utilizes Geneia services for its employees. During the annual software contract negotiations, you learned that the vendor is thinking about switching from our services to one of our competitors. I would like to delay renewal of the software contract until the vendor decides where they will be buying services this year. Why should they have our business if we don't have theirs?

**A** Renewal of the Geneia software contract has nothing to do with the vendor's choice regarding with whom it conducts its business. This is an example of reciprocity. The possibility of selling our services to a client should not interfere with other business decisions, such as where we purchase software. Our purchasing decisions should be based only on the merits of the product, such as quality, price, and service. Otherwise, our decision-making could be impaired.



Section 4:

**What other laws or requirements should guide my commitment to integrity?**

# Commitment

We do not act rightly because we have virtue or excellence, but we rather have those because we have acted rightly.

- Aristotle  
(384 - 322 B.C.E)

## A. Fraud, Waste and Abuse

Fraud, waste, and abuse in the healthcare industry are serious national problems, and they have the ability to impact all lines of Geneia business. Fraud is activity that is deliberately deceptive in order to secure unlawful or unfair gain. Most doctors, healthcare providers, suppliers, clients, and consumers are honest. This includes all lines of business and is *not* limited to Medicare or government related contracts. However, some may not be.

As employees in the healthcare industry, we play a significant role in identifying potential incidents of fraud, waste, or abuse, and reporting suspected inappropriate activity immediately.

It is important to understand that the differences between fraud, waste, and abuse are often subtle, primarily dependent on intent.

In reality, it is usually impossible to know the intent without an investigation, which normally includes a request for medical records and a thorough review of claims history. Because the lines between fraud, waste, and abuse are often blurred, employees are not expected to be able to identify the category into which the potentially inappropriate activity falls. Questionable activity should be reported to the special investigations unit so it can be investigated by trained personnel.

Following are definitions and examples of fraud, waste, and abuse, which only scratch the surface of the possibilities. Understanding what fraud, waste, and abuse look like in your business unit will ensure that you are prepared to take action should you observe it during your daily work activities.

Questions about a potential fraudulent, wasteful, or abusive activity should be immediately directed to management, the special investigations unit, or the compliance department.

### Fraud

#### Definition

Fraud is knowingly and willingly executing, or attempting to execute, a scheme to defraud any healthcare benefit program; or to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, any healthcare benefit program.



## Think about it

**Q** While completing a consumer's healthcare assessment, you reviewed the claim utilization and it appeared the provider billed for services that were not rendered to the consumer. What should you do?

**A** There are times consumers do not fully understand the extent of their healthcare services. However, if the claims utilization appears to be egregious or fraudulent, you should also report this to your management, the special investigations unit, or the compliance department, so that similar situations can be identified and addressed, if applicable.

## Think about it



The National Health Care Anti-Fraud Association (NHCAA) has estimated that three percent (3%) to ten percent (10%) of healthcare spending results from fraudulent billing. That's between \$67 billion and \$230 billion lost each year to fraud, waste, or abuse. That equates to between \$184 million and \$360 million lost per day. And this number is expected to increase every year as healthcare costs rise. This loss directly impacts patients, taxpayers, and government through higher healthcare costs, insurance premiums, and taxes.

- ▶ Deliberately submitting or filing false claims
- ▶ Purposely misrepresenting a condition or the type of services provided
- ▶ Borrowing someone else's insurance ID card to receive services

### Example

The provider deliberately submits a claim for a surgery that the provider knows was not performed.

## Waste

### Definition

Waste is the over utilization of services, or other practices that, directly or indirectly, result in unnecessary costs. Waste is generally not considered a criminal action, but rather the misuse of resources.

- ▶ Always performing a higher level of service or more extensive procedure
- ▶ Routinely ordering tests that may not be medically necessary

### Example

A physician only stocks the larger vials of medication, even if smaller vials are available, and bills for the medication used and wasted.

## Abuse

### Definition

Abuse includes actions that may, directly or indirectly, result in unnecessary costs. Abuse involves payment for items or services when there is not legal entitlement to that payment, and can occur even if the provider has not knowingly and/or intentionally misrepresented facts to obtain payment. Essentially, the difference between fraud and abuse is intent.

- ▶ Unknowingly submitting or filing claims for services that were not rendered
- ▶ Unintentionally submitting the incorrect condition or type of service provided

### Example

The provider's office routinely submits claims for surgical procedures the day after the surgery is scheduled to occur. The surgery is canceled but the billing office is not notified, and the office submits the claim for a surgical procedure that was not performed.

Healthcare fraud can result in significant liabilities and, in some cases, subject the perpetrator to criminal prosecution. Waste and abuse, just like

fraud, can result in the same process impediments and unnecessary costs of care. Geneia takes these issues seriously. Geneia has a fraud, waste, and abuse process to investigate any suspicious claims utilization activity and take appropriate action. When appropriate, investigative findings will be reported externally, e.g., to law enforcement or the Medicaid Drug Integrity Contractor (MEDIC).

In addition to inappropriate conduct from external sources, it is also possible for employees to perpetrate acts of internal fraud, waste, or abuse, including, but not limited to:

- ▶ Submitting false or "padded" expense reports.
- ▶ Forging or altering checks.
- ▶ Accepting checks for which they know services were not received.
- ▶ Falsifying 401(k) loan application (e.g., fabricating a reason to apply for a hardship exception).
- ▶ Submitting inaccurate time sheets (e.g., falsely claiming overtime hours).
- ▶ Intentionally revising Geneia records, financial statements, or government reports with the intent to mislead.
- ▶ Misusing or misappropriating Geneia property.

It is each employee's responsibility to notify management, the special investigations unit and the compliance department if you become aware of external or internal fraud, waste, or abuse.

Fraud, waste, and abuse defined actions are not the only actions that may place Geneia at risk; willful disregard for and/or negligence in following internal standards of conduct or policies and procedures may also result in process impediments, client or member dissatisfaction, and unnecessary costs of care. It is everyone's responsibility to be aware of and understand the corporate and department level policies and procedures that impact or control daily work processes and actions. Questions or concerns related to the failure to comply with these internal standards should be reported promptly to the compliance department.



## Think about it

**Q** You were working with a consumer who had minor surgery and noticed the provider billed for services that were not related to the surgery. You don't want to make waves, but something just doesn't feel quite right. What should you do?

**A** You should suggest your consumer discuss the extra charges with his provider. You should further discuss the questionable charges with your management or the compliance department to determine the appropriate action. It is everyone's responsibility to do their part to eliminate fraud, waste, and abuse.

**“** Whoever is detected in a shameful fraud is ever after not believed, even if they speak the truth.

*Phaedrus, Plato*

## Think about it



**Q** At a meeting of your professional association, some of the members talked about a plan to not compete in certain regions. You did not agree to participate, but what should you say if this happens again?

**A** Collusion is a serious violation. Anytime you are in a meeting with competitors and the discussion turns to topics that could be or are anti-competitive, you should excuse yourself from the meeting. Then contact either the legal or compliance department as soon as possible.

## B. Ineligible Persons

Geneia will not employ or contract with individuals or entities who have been convicted of certain criminal offenses related to healthcare or fraud, or who are ineligible to participate in federal and/or state healthcare programs. To ensure this, Geneia regularly checks existing government exclusion and preclusion lists to identify these ineligible individuals and entities, and performs cross checks against appropriate company databases. Geneia also requires subcontractors under its government programs to comply with all regulations regarding ineligible individuals and entities. It is important to remember that individuals are under a continuing obligation to immediately report to the compliance department any new details or changes in circumstances regarding eligibility to participate in a healthcare program or a conviction (or guilty or no contest plea) of a felony or misdemeanor in any jurisdiction.

## C. Fair Competition and Antitrust Laws

The antitrust laws prohibit anti-competitive behavior (including conspiracy and monopoly) and unfair business practices. Geneia has strict policies in place to ensure compliance with the antitrust laws. Of particular importance is the prohibition of agreements or joint conduct between competitors that harms competition. Compliance with antitrust laws means that we must:

- ▶ Never discuss with competitors any matter directly related to competition between Geneia and the competitor, including pricing, marketing strategies, sales policies and client contracts).
- ▶ Never agree with a competitor to restrict competition by fixing prices, allocating markets, or other means.
- ▶ Never require consumers to take a service/product they don't want, just so they can get the service/product they do want.
- ▶ Be accurate and truthful in all dealings with clients and consumers, and be careful to accurately represent the quality, features, and availability of Geneia services.

Be especially careful with information shared at trade associations or other meetings where interactions with competitors may take place. Because the antitrust laws are extremely complex, any questions about permissible conduct should be directed to the legal department.

## D. Political Activity in Connection With Work

Employees must not participate in political activities during work hours or on Geneia property. While Geneia encourages employees to participate in the political process, we must do so in accordance with federal and state laws. It is against the law to use corporate funds, property, facilities, or work time in connection with federal and state elections.

Outside of Geneia, you may make personal contributions, support candidates or political organizations, and vote as you wish. However, when you speak out about political activities, you should give no indication that you are connected with or speaking on behalf of the company.

## E. The Company's Commitment to Equal Opportunity/Affirmative Action

Geneia is committed to the administration of employment without regard to race, color, religion, national origin, sex, sexual orientation, gender, gender identity, age, genetic information, disability, veteran status, or marital status.

As an affirmative action employer, Geneia documents its good-faith efforts in recruiting, hiring, and developing an employee base reflecting a diverse cross-section of the local population. Furthermore, Geneia strives to purchase goods and services from both women- and minority-owned businesses. The company monitors its progress in reaching these goals and strives to maintain its achievements and improve its performance in these areas, as necessary.

Questions about equal opportunity or affirmative action should be directed to human resources.

## F. Responding to Government Investigations

As part of doing business, Geneia may be reviewed by government agencies. In addition, at any time, Geneia could be a subject of investigation on other matters. The company intends to comply with federal, state and local laws and regulations. It is Geneia's philosophy to cooperate fully with government agencies concerning examinations, audits,



### Think about it

**Q** Your friend is running for political office, and you would like to help with the campaign. Is this allowed? Also, may you volunteer as a monitor at a polling location during elections?

**A** Yes. Your personal political activity in your leisure time is appropriate. You may use planned PTO if you wish. Just make sure that you do not use corporate resources (facility, work area, corporate time, email, equipment, supplies, or the corporate name) to advance the campaign, or seek reimbursement for expenses incurred as a result of this outside political activity.

“

**Affirmative action is an effort to include every aspect of society in the decision making.**

Andrew Young

## Think about it



inquiries and investigations. In order to protect Geneia's interest, please follow company policy with respect to any such examination, audit, inquiry or investigation.

**Q** As you are leaving the building one evening, you are approached by someone who identifies himself as a federal law enforcement agent and begins to ask questions about our clinical processes. You don't want to get in legal trouble for refusing to talk to a government agent, but don't want to say the wrong thing, either. What should you do?

**A** You should notify our legal department of the request promptly and before providing any information. Explain to the law enforcement person that Geneia policy requires notification to the legal department before any information is provided. The legal department will evaluate the request, including whether a subpoena will be required for disclosure of the requested information.

Under the law, you have no obligation to provide any information to, nor speak with, an investigator at any time unless you are subpoenaed to testify in a proceeding. The Legal department can provide assistance in recommending how to respond to the request for information. If you are served with a subpoena from a government agency, you must report it to the Legal department immediately. Questions about government audits and investigations should be directed to the Legal and the Compliance department. See also *Appendix A* for contact information.

## G. Responding to Media Inquiries

Never respond personally to any media request. In order to provide accurate and consistent answers to inquiries and to protect consumers' confidentiality, all written or verbal media requests received by Geneia employees should be referred to Geneia's vice president of marketing.



Section 5:

**How does integrity affect my response to suspected misconduct or a code violation?**

## **Good Judgment**

In addition to guidance found in the Code and our company policies, we should always use integrity, common sense, and good judgment. We are required to ask questions if ethical dilemmas arise and report suspected violations. This ensures that the ethical culture we all enjoy is preserved. There may be times, however, when you are uncertain about what action to take. Be assured, you never need to go it alone.

## Think about it



### Employee checklist for reporting concerns

Carefully evaluate the issue, i.e., Why are you concerned? Is it illegal? Is it unethical?

Meet with management to professionally share your concerns, as follows:

- Describe the situation and the business area involved.
- Do you know of the situation from your direct observance, or did someone tell you about it?
- How did the situation occur? (For example, was a procedure followed or not followed? Was an instruction given by management? Was an inappropriate decision made by one or more employees?)
- When did the situation occur? (Include dates and approximate time frames of occurrence.)
- Where did the situation occur? (Specify a department, unit, facility, or other location.)
- Who was involved?
- Has anyone else observed the situation?

## A. Report Suspected Violations

While conducting business on behalf of Geneia, employees may become aware of a potential compliance violation or be faced with an ethical dilemma where the best response may not be obvious. You should never hesitate to report suspected violations or ask questions and seek assistance if ethical dilemmas arise.

You have access to several areas of support when you have concerns about potential non-compliance, suspected fraud, waste and abuse, or need to report a violation of the Code of Conduct, Geneia policies, or the law. Contact information and area of expertise by department can be found at Appendix A on page 1 of the code. Please use this convenient resource whenever needed.

Every reported compliance or fraud, waste and abuse concern is thoroughly investigated and addressed or corrected, as appropriate. Rest assured that your reports are welcomed and encouraged.

Remember to consult your with management staff or compliance officer if you are unsure whether your or your external business partner (e.g., contractor, supplier, first tier, downstream or related entity) are aware of all the compliance regulations that apply to the work you do for Geneia.

## B. What to Expect When Submitting a Report

### 1. Non-Retaliation

Retaliation, which can be defined as reprisal, interference, restraint, penalty, discrimination, intimidation, harassment, or other adverse employment consequences, will not be tolerated if taken against an employee who comes forward to raise a genuine concern; to make a good faith report of noncompliance with federal, state, or local laws and regulations; or to report suspected acts of noncompliance with corporate policies and procedures or the Code of Conduct. A report made in good faith involves one in which a genuine attempt was made to provide truthful and accurate information. Retaliation is prohibited by corporate policy and, in some instances, the law. If you suspect or observe retribution or retaliation, report it immediately to management, human resources, or the compliance department. An employee who is found to have engaged in this type of behavior against another employee will be subject to corrective action up to and including termination.

Geneia's policy against retaliation does not excuse us from the consequences of our own improper or unethical behavior. However, the consequences will never be more severe because of a self-report. To the extent possible, Geneia will make every effort to protect the reporter's request for confidentiality. Likewise, we are each responsible for protecting the confidentiality of any reports that are made to management or the compliance department as well as the privacy of any employee who makes such a report.

## 2. Investigation

Any report of unethical behavior or of a suspected violation of the code, corporate policy, law, or regulation will be promptly investigated. All team members are expected to cooperate fully with an investigation and to maintain confidentiality (to the extent reasonably possible) and respect for the process, our company, and our fellow team members.

The compliance department may seek assistance from, or refer matters entirely to, other areas for handling, including, but not limited to human resources, internal audit, special investigations unit, the legal department, and external compliance counsel, to assist with or handle the investigation. For example, human resources-related matters that are reported to the compliance department are promptly forwarded to human resources. Human resources is responsible for reviewing the concern, following up with the inquirer in a timely manner, and keeping the compliance department apprised of the progress and final resolution. This maintains an open-door policy to the compliance department, as well as effective resolution of concerns that are not directly related to compliance matters.

## 3. Corrective Action

Geneia disciplinary policies and procedures apply to issues of compliance misconduct. A violation of the code of conduct, corporate policy, law, or regulation could potentially result in corrective action up to and including termination of employment. The level of discipline administered will depend on the nature, severity, and frequency of the violation and may result in any one or more of the following corrective actions:

- ▶ Verbal counseling or coaching
- ▶ First written notice
- ▶ Second written notice
- ▶ Third or final written notice
- ▶ Termination



## Think about it

### Manager checklist for responding to employee concerns

- Maintain an 'open door' policy in your department, so employees are comfortable talking to you about problems.
- Schedule a meeting promptly when requested by an employee.
- Listen carefully and take seriously all information provided by the employee.
- Secure as much detail as possible to appropriately research and validate the issue. (See employee guidelines on previous page.)
- Express sincere appreciation that the concern was brought to your attention.
- If the issue is valid, move quickly to correct and resolve the situation, working with human resources if corrective action is necessary.

(Continued on next page...)

## Think about it



### ...Manager checklist for responding to employee concerns

- Provide feedback to the employee once resolved, excluding confidential details.
- Follow-up for a period of time to ensure that the problem has not recurred.
- If the issue is not valid, provide that feedback to the concerned employee, along with an appropriate level of explanation.
- Report non-compliance or unethical issues to the compliance department.
- Guard carefully against negative consequences to any employee who brings a 'good faith' concern to your attention.

Unethical or illegal behavior that impacts a benefit program, including, but not limited to federal government programs (Medicare, FEHBP, and CHIP), may subject Geneia to governmental corrective actions, including oral or written warnings or reprimands, suspension of enrollment or license, termination of governmental contracts, and/or financial penalties.

#### 4. Legal Reporting Requirements

Geneia's attorneys have a duty to report evidence of a material violation of law or breach of fiduciary duty or similar violation by Geneia, or any agent thereof, to the chief legal counsel or the chief executive officer of the company. If the counsel or officer does not appropriately respond to the evidence (adopting, as necessary, appropriate remedial measures or sanctions with respect to the violation), the Geneia attorney must report the evidence to the Geneia Board.

## C. Conclusion

As a condition of employment, and annually thereafter, every employee is required to complete a Disclosure Statement and Certification form, which includes acknowledgment that you have read the Code, understand it, refer to it as needed and abide by it. This is an important part of your job responsibilities, and remains the key to Geneia's success and our continuing good reputation in the communities that we serve.

As Geneia employees, we each have daily opportunities to conduct company business in accordance with the utmost legal and ethical business principles. Intentional contribution to a corporate culture of integrity has a very significant impact on personal and professional satisfaction and reward.

“

**It takes less time to do a thing right than it does to explain why you did it wrong.**

Henry Wadsworth Longfellow



## Think about it

**Q** What happens if you report an incident and then your coworkers and supervisor stop talking to you or verbally harass you?

**A** It is every employee's responsibility to ask questions or report concerns if they become aware of a suspected violation of the company's non-retaliation policy. An individual who harasses or threatens you for reporting these concerns may be subject to corrective action. The company will not tolerate any form of retaliation against you for reporting an issue in accordance with this code. You should bring this information to the attention of management, human resources, or the compliance department, or call the compliance hotline.

# Appendix A | Contact Information

As discussed throughout the Code of Conduct, you may contact the compliance department with any questions or concerns. Also listed below are additional contacts that you may use in a variety of situations.

## Compliance Department (Corporate and Medicare)

### Chief Compliance Officer

Patty Higgins

Phone: 717.541.7411

### Geneia Compliance Officer

Jean M. Kelly

Phone: 717.775.3755

### Corporate and ACA Compliance Officer

Babette Madison

Phone: 717.541.7275

### Medicare Compliance Officer

Gloria Yu

Phone: 717.541.7278

### Compliance Hotline

Phone: 800.565.0792

### Report Directly to the Geneia Board

Call the compliance hotline and select "board level" reporting.

## For Assistance with Specific Issues

### If the issue concerns:

Human Resources Issues

- ▶ Employment practices
- ▶ Harassment
- ▶ Respect in the workplace

Misuse of Company Resources, Fraud

- ▶ Financial
- ▶ Business practices

Confidential Information

- ▶ Privacy
- ▶ Information Security

Conflicts of Interest

Laws and Other Legal Questions

Contact to/from Regulator

Contact to/from Media

Reception Desk

Operations

### Contact this resource:

Human Resources

Phone: 717.775.3756

Special investigations Unit

Phone: 888.612.1277

Email: [Fraud@CapBlueCross.com](mailto:Fraud@CapBlueCross.com)

Geneia Privacy Officer: 717.775.3755

IT Security: 717.541.7200

Geneia Information Security Officer: 717.704.4384

Compliance Department: 717.775.3755

Legal Department: 717.775.3754

Compliance Department: 717.775.3755

Legal Department: 717.541.7747

VP of Marketing: 844.369.4098 x4093

Geneia General Number: 855.505.2583

Harrisburg Office: 717.775.3900

Manchester Office: 866.267.9894

Harrisburg Office: 717.775.2900

Manchester Office: 844.369.4098 x4096

# Appendix B | Gifts and Entertainment

As discussed throughout the Code of Conduct, below are charts of examples to help guide your decision on giving or receiving a gift or entertainment. If you have any questions, please contact the compliance department for further assistance.

## Examples of Business Gifts

### Generally Acceptable

- Logos
- T-Shirts
- Pens
- Calendars
- Flowers
- Gift Baskets (to be shared with coworkers)

### Generally Not Acceptable

- Jackets
- Wristwatches
- Electronics
- Jewelry
- Any gift which could be perceived to create a conflict of interest
- Gift Cards (must either be declined or donated)

## Examples of Business Hospitality and Entertainment

### Generally Acceptable

- Inexpensive general admission tickets to regular season sporting events
- A inexpensive round of golf with a business associate
- Travel expenses in connection with a speaking engagement
- Sharing a taxi to a trade show

### Generally Not Acceptable

- Expensive, hard to obtain tickets to playoff tournaments, or series
- All expenses paid vacation at a golf resort
- Accepting an offer to cover the costs associated with travel, accommodations and registration fees from the host or sponsor of an industry seminar
- Using a supplier's ski chalet for the weekend

## Hosting Meals/Entertainment for External Individuals or Entities

### Acceptable Hosting Situations

Non-government business - Geneia may reimburse for management-approved, business-related entertainment as long as the entertainment is reasonable, does not violate any law or regulation, and does not negatively impact Capital BlueCross and its subsidiaries' reputation.

The \$100 maximum gift allowance does not necessarily apply to meals and entertainment hosted by Geneia, but management approval is required in order to ensure that the entertainment is not excessive and is consistent with department policy and budgetary guidelines.

### Non-Acceptable Hosting Situations

Federal government employees - Providing meals or entertainment is strictly prohibited by federal law.

State and local government employees - Restrictions and reporting requirements may apply.

Before offering meals or entertainment to state or local employees, obtain approval from management and contact government affairs for guidance.

There are specific regulatory requirements regarding gifts to government enrollees and employees, including possible reporting requirements. The following guidelines apply for gift giving to the different categories. The compliance department must be notified of any gifts to be given in accordance with this section. Additionally, the compliance department should be provided with details of any gifts given to enrollees or prospective enrollees at least on an annual basis, or as otherwise indicated by the compliance department.

## Government Related Business Guidelines

### Government Program Enrollees

No cash or cash equivalent

Limited enrollee gift allowances  
Medicare Advantage or Part D:

- ▶ Maximum value of \$15 per item, and \$50 per calendar year
- ▶ Current Medicare enrollee rewards and incentives programs are excluded from this requirement.

Children's Health Insurance Program (CHIP):  
Maximum value of \$15 per item

Federal Employee Health Benefit Program (FEHBP):  
▶ Maximum value of \$20 per item, and \$50 per calendar year

Pennsylvania Health Insurance Marketplace (Pennie™)  
Contact the legal or compliance department to confirm current guidelines.

### Government Employees

No cash or cash equivalent

Maximum value of \$20 per item and \$50 per calendar year

Most meals and entertainment are forbidden by federal law, although modest refreshments are excluded from the gift rule restrictions (e.g., snacks, coffee, doughnuts).

Additional prohibitions and restrictions may apply where established by the government. See Section 3.D, "Contacts with Government Representatives."

Nongovernment business-Employees may give minimal monetary gifts, or reasonable and appropriate nonmonetary gifts, that are primarily advertising or promotional in nature, as long as the maximum value does not exceed:

- ▶ \$100 per gift; and
- ▶ \$100 per calendar year per individual

## Commercial Related Business Guidelines

Under Pennsylvania's rebated limitations: Maximum value of \$100 (in the aggregate) per calendar year. No cash permitted. Contact the legal or compliance departments with any questions.

# Exceptions and Guidelines on Receiving and Accepting Gifts and Entertainment

## The \$100 value rule does not apply:

"Incentive trips" offered by insurance carriers to high-producing marketing agents, as long as the employee will receive a 1099 Form for the value of the award (i.e., income), and uses approved PTO for time off during the trip.

Non-excessive activities offered to all participants at approved business meetings and conferences, e.g., golf outing, ball game, spa treatment, dinner. An approved business event means that Geneia pays for employees' travel and other expenses associated with the meeting or conference.

On-site or off-site meals must be

- ▶ Reasonable and non-excessive
- ▶ Offered on an infrequent basis
- ▶ Compliant with department or corporate policies and state or federal laws and regulations
- ▶ Pre-approved by management

## Non-cash raffle prizes that may be accepted:

The event is not for only Capital BlueCross or its subsidiaries' employees.

Everyone who registers, puts in a ticket, or otherwise enters the contest has the same opportunity or chance to win.

The prize is not excessive or inappropriate to the occasion (e.g., an iPad would be allowed, but no lavish trips.)

The prize is not cash or a cash equivalent (unless the "Cash Gift Transfer Form" is used for donation purposes.)

Neither Geneia, nor any of its affiliates or employees, is under any obligation to the vendor or supplier of the prize for having entered or for winning the prize item.

In all instances, regardless of the value of the prize, winning does not influence an employee's decision making or otherwise compromise an employee's ability to act in the best interests of Geneia or its affiliates.

If an employee who has won a vendor's raffle drawing is subsequently involved in choosing or evaluating a vendor, that employee must disclose the winning of the prize to his/her manager and to the compliance officer, and may need to recuse himself/herself from decision-making.

# Frequently Asked Questions (FAQs)



**One of our vendors invites me and a couple of my coworkers to dinner to celebrate the completion of a big project. May we attend?**

Yes, as long as the occasion follows the guidelines in the Code, including ensuring that the dinner is: 1) offered on an infrequent basis, 2) reasonable and appropriate to the occasion, 3) compliant with department or corporate policies and state or federal laws and regulations, and 4) preapproved by management.

**A prospective vendor extends an invitation for one person from my business area to attend an all-expense paid weekend conference at a popular resort. May I accept the offer?**

No. In most instances, Geneia prohibits any outside entity or individual from paying for an employee's expenses to attend a conference or seminar, including those who do business or seek to do business with Geneia. This includes discounted conference fees or reimbursement for travel, meals, or lodging expenses, as well as offers of gifts or prizes valued at more than \$100. We must ensure that Geneia's decisions regarding a current vendor or prospective vendor are not influenced by favoritism or inappropriate motives.

**I have been offered a free watch from one of our vendors. Can I accept it?**

Probably not, as it may suggest inappropriate motives and exceed the maximum gift allowance of \$100. You cannot accept gifts, loans or other favors from anyone doing business with Geneia or who wishes to do business with Geneia unless gifts they follow the guidelines listed in the code. You should discuss all gifts you are offered with your management and the compliance department because, in some situations, it may never be appropriate to accept a gift of any value. See Appendix B for more information of gifts and see Appendix B for who to contact.

**My wife is a developer at a software vendor that does business with Geneia. Sales supervisor for Geneia. I am an application engineer at Geneia. Is this a conflict of interest?**

It could be. Report the relationship to your supervisor and compliance department. To avoid the appearance of a conflict, the compliance department may request that you agree to certain "parameters" regarding the situation. See Appendix A on who to contact for conflict of interest questions.

**A company that I use to arrange Geneia events offered me a discount on catering services for my family party. May I accept the discount?**

Personal discounts that are offered to you because of your position with Geneia are considered gifts and must be refused in most cases. However, if this discount is available to all Geneia employees, it may be acceptable. Talk to your supervisor and the compliance department if you need help on a specific situation. See contact information in Appendix A.

**May I give a supplier a gift basket with fruit and cookies to celebrate the end of a project?**

The best approach is to give no gift at all. If business customs and the circumstances are such that you feel you must give a gift, be sure it's just a token. You may give this type of gift so long as giving it does not violate any laws or policies, including the policies of the supplier's company. You should get approval for this gift from your supervisor before you present it. Be sure that its expense is disclosed accurately and fully in your expense report. See Appendix B for guidelines on gifts and entertainment.

**A business partner offers you tickets to a golf tournament. Should you accept them?**

It depends. If the tickets have a value of \$100 or less, you may accept them. If you're unsure as to what to do in a particular situation, see Appendix B for guidelines on Gifts and Entertainment.

## ...Frequently Asked Questions (FAQs)



### **Can I remain anonymous when submitting a report?**

The Compliance Hotline will allow you to report anonymously. You will receive a ticket number and turnaround time so you may call back for a resolution or if additional information is needed. You may also remain anonymous when reporting internally, such as by submitting an anonymous inquiry on the compliance department's website or through inter-office mail.

### **What will happen if I file a report of concern?**

Geneia encourages you to report suspected violations of the Code or the law, and prohibits retaliation against anyone who, in good faith, reports a violation of the Code or cooperates in an investigation. If you feel that you have been retaliated against, you can report this to the compliance department or through other means identified in the Report Suspected Violations section of the Code.

### **I am working on a project team, and I disagree with the project manager's interpretation of a legal requirement. She told me that it's not my role to raise these issues. What should I do?**

If you are unable to resolve the issue through conversations with the project manager, and you believe in good faith that she is acting on an incorrect interpretation of a legal requirement, you should speak with your manager or see Appendix A on who to contact for additional assistance.

### **I have seen some conduct at the office that I think is illegal but it is not addressed in the Code. What should I do?**

If you suspect illegal behavior, you should report it or talk with your supervisor or manager about it. No Code could possibly address every situation. You are responsible for understanding the laws applicable to your job and abiding by the policies in place at your work site. The bottom line is that you have to exercise good judgment and high ethical standards at all times whether or not an issue is specifically addressed in the Code. See Appendix A on who to contact for additional assistance.

# Ethical Decision-Making Framework



1. Identify the ethical problem.



2. List possible solutions and any obstacles to resolving them.



3. Seek input from others.



4. Determine the best approach.



5. Call the compliance department if the path isn't clear.



6. Follow through on your decision.



## **You are empowered**

Geneia supports you in doing the right thing so you can deliver great service to our members and providers.

## **You have responsibility**

You play a critical role in ensuring Geneia is a great work environment and in protecting our culture, reputation, and brand.

## **You have help**

The Code of Conduct lists numbers to contact for support in various situations. As always, you can contact the compliance hotline to report an incident.

## **You have a voice**

Geneia wants to hear your concerns and does not tolerate any form of retaliation. If you believe something isn't right, you can speak up knowing you have the support of management and the compliance department.



[Solutions@Geneia.com](mailto:Solutions@Geneia.com) | 866.267.9894 | [Geneia.com](http://Geneia.com)

