



# Our commitment to integrity



Every day, Anthem defines itself through the actions of our associates and our leadership. Integrity is central to who we are, and my expectation is that we do the right thing, every time.

Anthem's Standards of Ethical Business Conduct are the foundation of our Ethics and Compliance Program. They guide our actions, our decisions, and our operations. By understanding and following the Code, you help safeguard Anthem's integrity and reputation as an ethical, caring company.

Our Standards of Ethical Business Conduct are grounded in our values:

- Accountable
- Caring
- Easy to do business with
- Innovative
- Trustworthy

Living these values means holding ourselves accountable. If you identify something you believe is not in accordance with our values, speak up; we cannot fix what we do not know. Associates who elevate issues should be commended, and any retaliation against those who report ethics and compliance concerns will not be tolerated.

Millions of Americans depend on us to provide them with high quality, affordable health care solutions. Those relationships, and our company's success, are built on the trust and confidence of those we serve. Let's continue to strengthen those relationships by doing the right thing, even when no one is watching.

A handwritten signature in black ink that reads "Joseph R. Swedish". The signature is written in a cursive, flowing style.

Joseph Swedish  
Chairman, President and Chief Executive Officer  
Anthem, Inc.

# “Doing the right thing” for our company and customers

As Joe mentions in his letter, Anthem’s integrity, reputation and culture are defined by our values and actions. In Ethics and Compliance, we are working to further develop and continuously invest in Anthem’s compliance and ethics culture. One of our primary goals is to foster a proactive culture centered on trust and accountability, in which all associates “do the right thing” each day, for our company, customers and business partners. This means working closely with each of you, to ensure you have the tools you need to act ethically and be compliant in every decision.

Anthem’s Standards of Ethical Business Conduct (Code of Conduct or Code) is a valuable guide to ethical decision-making, covering issues that may arise with fellow associates, customers, vendors, competitors and the general public. All associates are expected to read the Code and understand how it applies to you and to your work. You are accountable for understanding your responsibilities under the Code, including the responsibility to report suspected violations and to cooperate in company investigations. At Anthem, we take all reports seriously, and any retaliation for good faith reporting is strictly prohibited.

If you have questions about the Code, compliance or ethics, you can contact the Ethics and Compliance HelpLine at 877-725-2702, or [ethicsandcompliance@anthem.com](mailto:ethicsandcompliance@anthem.com). You may also contact me directly at any time with questions or concerns regarding compliance with the Code of Conduct and our standards for integrity and ethics.

Remember, all associates play an important role in protecting our brand, promoting an ethical and compliant culture and avoiding negative outcomes like sanctions, fines and unwanted publicity. To be America’s trusted health partner, we must act ethically every day and develop a strong and effective compliance culture that drives our actions. It’s our reputation and every associate is accountable for protecting it and helping Anthem maintain an effective compliance program.



A handwritten signature in black ink that reads "Edward L. Stubbers".

Edward L. Stubbers  
Senior Vice President, Chief Compliance Officer  
Anthem, Inc.

# Why we have the Code

The Anthem Standards of Ethical Business Conduct (Code of Conduct or Code) is a resource for all of us and is not a comprehensive policy or rulebook. Our Code provides us with guidance on conducting our business ethically. It also helps protect our reputation, customers, shareholders, suppliers and other business partners.

**Retaliation against anyone reporting in good faith a known or suspected ethical or compliance concern is prohibited. Anyone found to have retaliated against someone for making such a report will be subject to corrective action, up to and including termination of employment.**

The Code applies to Anthem, Inc., its affiliates and subsidiaries, Board of Directors, officers, management and associates. Certain Anthem subsidiaries and business units may approve supplements and/or versions of this Code targeted to unique operations. For example, if you work in our National Government Services or DeCare Ireland operations, you must also comply with the Codes of Conduct applicable to those entities. Additionally, the Code applies to our first tier, downstream or related entities, and our business partners.

If you work with third parties, such as consultants, agents, brokers, independent contractors, or first tier, downstream or related entities (third parties), you must require these parties to comply with relevant aspects of Anthem's compliance policies; provide these parties with information about policy requirements; and take action, up to and including terminating a contract, after learning that a third party failed to abide by Anthem's compliance policies.

The Code does not create any contractual rights between you and Anthem. It may be changed or modified by Anthem at any time without notice. We should not interpret the Code as a promise of employment or continued employment.

Anthem's Ethics and Compliance program is led by the Chief Compliance Officer. The Anthem, Inc. Audit Committee of the Board of Directors oversees the program and receives periodic direct reports from the Chief Compliance Officer, as well as from business unit Compliance Officers, as appropriate. The Board of Directors may only grant a waiver of all or part of the Code under exceptional circumstances. Any waivers will be disclosed as required.

## Purpose Statement

Together, we are transforming health care with trusted and caring solutions.

## Vision

To be America's valued health partner.

## Our values

Our values provide an overall foundation for our success, helping define what we do and how we do it.

- **Accountable:** We deliver results. We strive for excellence. We make a difference for our customers.
- **Caring:** We make a difference in people's lives. We treat our customers the way we want to be treated. We engage and listen with empathy.
- **Easy to do business with:** We provide simple solutions. We use clear language. We make it easy for customers even when it's hard.
- **Innovative:** We support creativity and risk-taking. We look to the future while acting in the present. We challenge the status quo.
- **Trustworthy:** We do the right thing. We are transparent in words and deeds. We keep our commitments.

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Anthem's Standards of Ethical Business Conduct are the foundation of our Ethics and Compliance Program. They guide our actions and our decision-making process. By understanding and following the Code of Conduct, you help safeguard Anthem's integrity and reputation as an ethical, caring company.



## Our shared responsibilities

Our Code of Conduct puts our company's values into action. We have a responsibility to comply with our policies and applicable laws (including the laws of any country you may visit on company business). By following the Code and living our values, we protect our reputation. Remember, we are all individually responsible for Anthem's integrity.

## How do I know if doing something may be unethical or violate the spirit of our Code?

Ask yourself the following questions:

- Am I concerned with legal implications?
- Does my action comply with our values and the Code?
- Is my action honest?
- Will my action appear inappropriate to others?
- Would I be proud to tell my family or friends about my action?
- Would I like to see my action televised in the news?

If you answer “no” to any of these questions seek guidance from your manager before you act. If you do not want to talk to your manager, contact Human Resources or the Ethics Office for advice.

## Knowing and complying with our policies

We are responsible for knowing, understanding, and complying with our policies and applicable laws. By committing to these responsibilities, we will continue to conduct our business with integrity and maintain the trust and high level of service expected from us.

To locate key enterprise-wide policies go to WorkNet/ Companywide Policies and Guiding Principles. To access our Human Resources policies go to My HR on WorkNet. For procedures related to your business unit’s activities, please contact your manager.

## Making ethical decisions

The Code and our policies cannot replace our own sense of integrity and good judgment. We are each responsible to do what is right. Act with unquestionable ethics in all business matters. Never commit, or ask others to commit, unethical or illegal acts. Immediately report any request or direction to commit an act you think may be illegal or unethical.

## Associate training

All new associates must complete new associate ethics and compliance, privacy, fraud and abuse training, and on an annual basis all associates must complete refresher training. Additional specialized training may be required for some of our business units.

Managers must ensure that their associates complete their assigned training. Associates failing to successfully complete required training may be subject to corrective action, up to and including termination of employment.

## Managers’ responsibility

Managers are role models and lead by example. Associates often rely on their manager for guidance in difficult situations. Managers must foster an ethical and compliant culture, and encourage their associates to bring concerns to their attention. Managers are expected to:

- ensure their associates timely complete required compliance training
- talk openly about ethical behaviors whenever possible
- maintain an “open door” policy so associates feel comfortable bringing concerns to you
- periodically remind your associates about our non-retaliation policy
- ensure associates know the importance of reporting concerns
- embrace the Code and be an example of an ethical leader
- maintain a workplace environment supportive of the Code
- educate and reinforce with your associates the meaning and application of the Code
- provide leadership and support, including contacting the Ethics Office when suspected or observed misconduct is reported to you
- enforce the Code and apply consistent corrective action for violations



As a manager, your work in building a culture of openness and trust has reaped benefits. Your associates trust you and come to you with questions or concerns. Now you have received a report of misconduct from an associate. What should you do next?

## Triage the Concern

When you receive a report of any misconduct, escalate as necessary and address it in a timely manner. Determine if the concern is urgent and requires immediate action.

Employment law, and behavioral or job performance issues should be addressed directly with Human Resources. Some examples include, but are not limited to: sexual harassment, associate conflicts, labor and wage laws issues, and performance reviews.

Ethics and Compliance concerns include, but are not limited to:

- conflicts of interest
- associate dishonesty, e.g. intentionally falsifying expense reimbursement requests, and production reports.
- improper disclosure/receipt of confidential or proprietary information
- inappropriate access/disclosure of PHI
- accepting/offering gifts or entertainment over limits
- retaliation for reporting an ethical or compliance issue
- accounting, auditing and internal control irregularities
- not maintaining adequate clinical licensing

If you are not sure who to contact about a report, call the Ethics and Compliance Helpline at 877-725-2702, or send an email to [ethicsandcompliance@anthem.com](mailto:ethicsandcompliance@anthem.com). We will provide direction and guidance.

Significant ethical and compliance issues include situations in which an associate is engaging in conduct that may be illegal or in violation of company policies or our Code. To ensure a prompt investigation, report these issues as soon as you are made aware of them.

## Enterprise risk management

We have a responsibility to understand and follow company policies that address our business risks. Managers have an additional responsibility to identify and properly manage risks. Managers and associates work together to help ensure effective controls are in place to minimize risks.

If you are aware of business risks that are not being managed appropriately, discuss them with your manager or Internal Audit. Enterprise Risk Management information is available at WorkNet/Internal Audit, Controls Assurance, Enterprise Risk Management/Enterprise Risk Management.



## Reporting violations and seeking advice

We all have a responsibility to speak up and report issues. We must all foster a culture where everyone feels comfortable raising issues or concerns in good faith and without fear of retaliation.

## Reporting misconduct and ethics concerns

You have an obligation to report any suspected or observed misconduct, including violations of the Code, company policies and procedures, laws and regulations, or other ethical concerns, to the Ethics Office. Reporting suspected or observed misconduct or other ethical concerns is a condition of employment. We all must be committed to “do the right thing” in Anthem’s business matters. In addition, by reporting misconduct, associates are contributing to Anthem’s ethical culture.

The Ethics Office provides you with various channels to submit reports or to ask questions. You may first contact your manager for help. If you do not want to discuss the matter with your manager, or if a concern raised with your manager is not resolved, you should report the matter to the Ethics Office. The Ethics Office can be reached by:

- calling the Ethics and Compliance HelpLine at 877-725-2702
- sending an email to [ethicsandcompliance@anthem.com](mailto:ethicsandcompliance@anthem.com)
- sending a letter to:  
**Ethics Office**  
c/o Chief Compliance Officer  
Anthem, Inc.  
Post Office Box 791  
Indianapolis, IN 46206  
United States
- You may also contact the Ethics Office staff directly, or report your concerns directly to the Chief Compliance Officer in writing, by telephone or by email

Reports may be submitted confidentially and anonymously to the Ethics Office using the HelpLine, email or mailing address listed above.

### When is the Ethics and Compliance HelpLine available?

The HelpLine is available 24 hours a day, seven days a week. HelpLine calls are not traced. No attempt is made to identify anonymous callers. The Ethics Office answers the HelpLine during business hours and will not record the call. Voicemail is available if we are unavailable, or if the call is received after business hours. The Ethics Office follows up on all calls.

### If I get the HelpLine voicemail, what type of information should I include in my message?

Please leave your name and telephone number, so we can call you back. If you wish to remain anonymous or do not want to talk to us, please leave as much information about the situation as you can (including the names of those involved and locations), so we have enough information to investigate the matter.

## Reporting accounting, auditing and internal control accounting concerns

Concerns regarding accounting, auditing and internal accounting controls deserve special mention. We must report concerns about accounting, auditing and internal accounting control deficiencies or non-compliance to the Ethics Office using one of the channels previously identified.

## Reporting fraud, waste and abuse

Anthem recognizes the importance of preventing, detecting, and investigating fraud, waste and abuse, and is committed to protecting and preserving the integrity and availability of health care resources. Anthem accordingly maintains a comprehensive program to combat fraud, waste and abuse in the healthcare industry.

Fraud, waste and abuse, dishonesty or criminal conduct involving our business operations is not allowed and will not be tolerated. In general, fraud refers to any intentional, deceitful act committed to obtain or deprive money or property. Abuse is a broad concept that refers to an activity that is not consistent with generally accepted business, medical or fiscal standard practices. Waste involves overutilization of services, or other practices that result in unnecessary costs, taxpayers not receiving reasonable value for money in connection with any government funded activities due to an inappropriate act, or omission by players with control over or access to government resources.

Actual or suspected crime, fraud or other misconduct in violation of the law or the Code by the company, or any associate or affiliate acting on behalf of the company, must be promptly reported to the company as follows:

**Duty to Report:** To report member, beneficiary, provider, or vendor fraud, waste and abuse concerns, contact the Special Investigations Unit. Contact telephone numbers and the online Fraud and Abuse referral form can be located on WorkNet/Quick Links/Fraud & Abuse Referrals.

## Does Corporate Ethics investigate all concerns reported?

The Ethics Office reviews all reports and investigates all ethics and compliance issues. Matters received that are normally reviewed by Human Resources, fraud, waste and abuse teams, or business unit Compliance teams may be referred to those areas. For example, concerns that may be referred to Human Resources for resolution include, but are not limited to: sexual harassment, discrimination, employment law, drug and alcohol use, misuse of company assets, conflicts between coworkers, abuse of leave of absence programs and job performance related matters. Concerns that may be referred to fraud, waste and abuse teams include allegations of member and provider fraud, waste or abuse. Matters that may be referred to business unit Compliance teams include, but are not limited to, reports of suspected non-compliance or inquiries regarding compliance with laws, regulations, policies and procedures, such as enrollment and disenrollment, member marketing materials and issues involving the performance or oversight of the first tier, downstream and related entities.

## What are some examples of misconduct that could result in corrective action?

Some examples include, but are not limited to:

- submitting false timesheets or expense reports
- inappropriately accessing another associate's or member's confidential information
- lying or failing to fully cooperate in an investigation
- not reporting a known or suspected Code violation
- making an intentional false report of a Code violation
- sharing confidential or proprietary information without authorization or a business need
- not completing required ethics and compliance training

Reporting concerns is required so that they can be addressed at the earliest possible stage.

## What types of concerns regarding accounting, auditing or internal accounting controls must be directed to the HelpLine?

Examples of matters that must be reported include:

- false statements or deliberate errors in the recording and maintaining of Anthem's financial records
- false statements or deliberate errors in the preparation, evaluation, review or audit of any Anthem financial statement
- deficiencies in or non-compliance with Anthem's internal accounting controls or policies
- misapplication of generally accepted accounting principles
- the misrepresentation of any fact or the making of a false statement to or by an officer, accountant or associate regarding a matter contained in the financial records, financial reports or any other public document

## Q&A

Q. *What is a “good faith” report?*

A. A good faith report is one where the reporter has a reasonable belief that the information provided relates to possible misconduct.

Q. *I am an employee of a vendor working on an Anthem contract. How can I make a report?*

A. You may send a written report to the email or post office box address, or you may call the Ethics and Compliance Helpline. You may also report concerns to any team member of the Ethics Office or the Chief Compliance Officer directly by telephone or email. In addition, the Ethics Office will accept international calling charges. Translation services will be arranged as necessary.

In addition, this Code is published under the Corporate Governance section on our public Internet site at [www.antheminc.com](http://www.antheminc.com). The Anthem Supplier Code of Conduct is also published on our public Internet site and contains the Ethics Office contact methods.

**Violations of this Code of Conduct may result in corrective action, up to and including termination of employment or contract.**

## Non-retaliation and non-intimidation

Anthem prohibits retaliation against any person for reporting in good faith any suspected or observed misconduct, non-compliance or other ethical concerns, and accounting, auditing or internal accounting control concerns. Retaliation includes, but is not limited to, discharging, demoting, suspending, threatening, intimidating or harassing the reporter for making such a report.

Any person, regardless of status, who engages in retaliatory conduct is subject to corrective action, up to and including termination of employment in the case of an associate, or termination of assignment or relationship with Anthem for those in other roles.

Acts of retaliation in violation of this policy should be reported to the Ethics Office.

The Non-retaliation policy is located at WorkNet/Enterprise Shared Services/Legal and Compliance/Ethics and Compliance.

## Investigating reported violations, confidentiality and duty to cooperate

The Ethics Office reviews all reports received and fully investigates, as appropriate, all ethical and compliance concerns, or ensures the appropriate business area, if applicable, reviews the matter. Appropriate corrective action will be taken to address and correct reported concerns. We treat all reports confidentially. The information you provide will be shared only on a “need-to-know” basis with those responsible for resolving a concern.

We all have a duty to fully cooperate with an Ethics and Compliance investigation. We must provide all known information and must not withhold, destroy, or tamper with any records or other potential evidence related to the matter under investigation.

## Corrective action

If you approve or participate in actions that violate the Code, company policies and procedures, laws or regulations or fail to fully cooperate in an investigation, you are subject to corrective action. Corrective action may be up to and including termination of employment in the case of an associate, or termination of assignment or relationship with Anthem for those in other roles.

## Disclosure

We are committed to making appropriate disclosures to regulators, business partners and law enforcement authorities.



## Our work environment

We are committed to a safe and healthy work environment. When we work in an atmosphere of honesty and respect, we enhance our relationships with our coworkers, customers and business partners.

You should read the policies mentioned in this section. You can do this by going to the My HR section of WorkNet. If you need help locating or understanding these policies, please contact your manager or Human Resources.



## Alcohol and drug-free workplace

We are expected to report to work free from the influence of illegal drugs and alcohol. We are prohibited from possessing, selling, manufacturing or distributing illegal drugs on company property and during work time at any location. The only exception is if senior management has specifically approved the possession and serving of alcoholic beverages for special events.

In addition, we are not allowed to keep illegal substances in our vehicles while on company-owned or leased property. Searches of personal and company property located on company-owned or leased property may occur at any time. A violation of the company's policy on alcohol and drug-free workplace may result in corrective action, up to and including termination of employment.

## Drug/alcohol testing

If your manager has reasonable suspicion that you are under the influence of drugs and/or alcohol, you may be required to submit to alcohol and/or drug testing. In addition, possession of paraphernalia is reasonable suspicion to support testing. Refusing to submit to testing may result in corrective action, up to and including termination of employment.

The Drug-Free Workplace law requires anyone working on a government contract to notify their manager within five days of any drug-related criminal conviction.

Anthem has an Employee Assistance Program (EAP) for associates who are seeking drug counseling, rehabilitation and other employee assistance programs.

## Workplace violence

If you experience or have knowledge of any threatening behavior, you should immediately report it to your manager or Human Resources. Our work environment is expected to be free from acts of violence, threats, harassment, intimidation or other disruptive behavior.

This policy applies while you are at work or while conducting company business. All threats (even in jest) are serious and may result in corrective action, up to and including termination of employment.

## Weapons

Weapons are prohibited on company-owned or leased property and while conducting company business.

## Qualification of associates

We believe hiring the best-qualified applicants contributes to our success. Background checks are conducted on all associates and temporary workers.

## Employment of government personnel

The hiring of federal government personnel is governed by federal law. Contact the Ethics Office before discussing employment or consulting arrangements with current or former federal government employees.

When considering hiring former state government employees, the hiring business unit is responsible to ensure no conflicts of interest exist with their Anthem duties and the individual's previous state employment. Often, individual state's Ethics Offices can be contacted by the job candidate or the hiring business unit to help you address any concerns. You can also contact the Ethics Office or your business unit Compliance team if assistance is needed.

## Equal employment opportunity and affirmative action

We provide equal opportunity in employment to all associates and applicants. Nobody shall be discriminated against in employment because of race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by applicable federal, state or local laws, except where a bona fide occupational qualification applies.

## Solicitation and distribution of materials

We may not solicit other associates or distribute non-work-related literature or materials during work time and in work areas. Solicitation or distribution for any purpose by non-associates is not allowed on company property unless approved by senior management. Distribution includes the distribution or posting of literature, pamphlets, chain letters, personal business cards or any other written or printed material of any kind, including electronic mail. In addition, the use of office supplies for non-company sponsored solicitation activities is prohibited. There are limited exceptions to this policy.

To read this policy and for exceptions, examples and guidance, please go to Worknet/MyHR. If you have any questions, please contact Human Resources.

## Discrimination and harassment

We are committed to a work environment free from discrimination and harassment. We forbid discriminatory harassment with respect to race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by federal, state or local laws. In addition, you are prohibited from retaliating against others for reporting what they believe to be a violation of this policy.

## Sexual harassment

Sexual harassment is prohibited. It may take many forms, including unwelcome sexual advances, requests or demands for sexual favors and other visual, verbal or physical conduct of a sexual or gender-based nature when:

- submission to or rejection of such conduct is used as a basis for employment decisions such as, but not limited to promotions, transfers, appraisal ratings, corrective action, training opportunities, salary treatment or job assignments

### Some examples of discriminatory harassment are:

- epithets, derogatory comments, slurs, or unwanted sexual advances or invitations
- derogatory posters, screen savers, backgrounds, cartoons, drawings or gestures
- assault, intentional blocking or interfering with normal movement
- inappropriate words, labels or symbols used as IDs, passwords, computer sign-offs or greetings
- threats and demands to submit to sexual requests in order to maintain employment or avoid some other loss, and offers of job benefits in return for sexual favors

### Some examples of sexual harassment are:

- 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 and jokes of a sexual nature
- nonverbal conduct such as obscene gestures, leering, whistling, displaying or circulation of sexually suggestive objects or pictures
- aggressive, intimidating or “bullying” conduct directed toward someone because of their gender, even if not in a sexual nature

- submission to such conduct is made either explicitly or implicitly a term or condition of employment
- such conduct has the purpose or effect of unreasonably interfering with an associate’s work performance or creating an intimidating, hostile, or offensive work environment

**If you believe that you are being discriminated against or harassed, you are required to report the situation to your manager or a Human Resources representative immediately. If your manager is involved in the offensive conduct, you are required to report the situation directly to Human Resources.**





## Protecting our information

We have many types of information that are vital to conducting our business. This includes material and nonpublic information as well as other confidential and proprietary information about our:

- strategies, products, processes, services and financials
- members, providers, associates, vendors, agents, business partners and government contracts

We must never disclose our confidential and proprietary information to anyone unless authorized to do so by company policy and a legitimate business need exists. In addition, we must never use nonpublic, material, or confidential and proprietary information about external entities we may have learned in the course of doing business with them without proper authorization and approvals.

You can find our Privacy policies by going to WorkNet/ Enterprise Shared Services/Legal and Compliance/Ethics and Compliance. Other company policies are located at WorkNet/ Companywide Policies and Guiding Principles.

## Confidential and proprietary information about our business

Anthem's confidential and proprietary information includes any information that is not shared with individuals outside of the company, or any information that could be useful to our competitors.

It is everyone's responsibility to help ensure that our confidential and proprietary information is used only when authorized by policy and for valid business purposes. We are obligated to protect this information from improper use or disclosure even after our employment ends.

Work product developed as an Anthem associate remains Anthem property. We may not take customer lists, formulas, processes, contracts, trade secrets, intellectual property, sales related information, or any other company confidential or proprietary information with us when our employment with Anthem ends.

## Confidential and proprietary information about our competitors

If you receive any unauthorized nonpublic, confidential or proprietary information from or about any competitor, you must immediately:

- stop reviewing the document(s)
- place the document(s) in a sealed envelope
- send the document(s) to and contact the Legal Department to describe the specifics of receipt (time, date, means of receipt, people involved and extent of review)

### What are some examples of confidential and proprietary information about our business?

- financial data and projected earnings
- sales figures and related information
- trade secrets
- provider contracts
- marketing strategies
- lists of vendors, customers and business associates
- product design and development
- pricing policies and rates
- underwriting guidelines
- business forecasts and strategies
- actuarial data
- associate information

No copies of the document(s) are to be made or kept outside of the sealed envelope sent to the Legal Department.

If you have confidential or proprietary information not publicly available from a prior employer, or other external source who may, or may not be a competitor, you cannot use or share that information at Anthem. Sharing any unauthorized information violates laws, damages our integrity and exposes both you and the company to many risks. Improper use of this type of information may result in corrective action up to and including termination of employment and/or other legal proceedings.

### What are some examples of confidential member and beneficiary information?

- name
- birthdate
- address or telephone number
- Social Security number
- financial and banking information
- health status or medical history
- diagnosis code or medical claim information

### What are some examples of confidential associate information?

- wage/salary data, performance review, corrective action and other personnel records
- employment agreement
- Social Security number
- financial and banking information
- claims and medical information

Contact the Legal Department or the Ethics Office if you have any questions.

## Confidential information about our members

Federal, state and local laws govern our use and disclosure of our members and beneficiaries health, financial or any other private information.

Never access or share any member or beneficiary confidential information unless authorized by policy and your assigned job duties require you to do so. We must maintain the trust of our members and beneficiaries and keep their information confidential.

In addition, never access claims or confidential information about yourself, family members, or those with whom you have a personal relationship with including, but not limited to, significant others, roommates, friends, in-laws or neighbors. You, and those with whom you have a personal relationship, must utilize the appropriate Customer Service channels to address any matters.

### Confidential information about our associates

Never access or provide anyone confidential associate information unless it is authorized by policy, for a valid business purpose, and your assigned job duties require you to do so. Nothing in this section or the company's policies is intended or will be applied in a manner to limit associate rights under the National Labor Relations Act.

### Confidential information about our providers, vendors and business partners

Never access or share confidential information about our providers, vendors and other business partners unless it is authorized by policy, for a valid business purpose and your assigned job duties require you to do so.

### Requests for confidential information related to government contracts

Most of the information relating to government contracts (federal, state and local) is government property. The Freedom of Information Act, Privacy Act of 1974 and other laws prohibit unauthorized use and disclosure of this information. Forward requests for confidential information related to our government contracts to your manager, the Legal Department or the Ethics Office.



**We must follow all policies that dictate who may access confidential information. If you need information relating to your own health coverage, or those with whom you have a personal relationship, you must go through the normal business process by contacting Customer Service.**

#### Q&A

- Q.** *I work in Sales and my job duties allow me to access claims data. My sister wants copies of all her Explanation of Benefits (EOBs) for the current year. She asked me to get copies for her. Can I do this?*
- A.** No. Although your sister has given you permission, you are not authorized as part of your job responsibilities. Your sister must contact Customer Service.
- Q.** *I worked long hours for Anthem developing my customer contacts. I recently accepted a similar position with a competitor. Can I keep the client lists I worked so hard to develop?*
- A.** No. Anthem customer lists and other proprietary information developed while at Anthem are owned by Anthem. Anthem reserves the right to contact your new employer if we have reason to believe you have taken proprietary information. This could impact your relationship with your new employer. In addition, you must return all Anthem provided equipment and records upon departure.

## What is material information?

Information is generally considered material if a reasonable investor would consider it important in making a decision to buy, sell or hold company securities.

## What is nonpublic information?

It is information that the public does not know. Generally, this means that the information has not been in a press release or media.

Some examples are:

- future earnings or loss projections
- financial results or information
- news of significant gains or losses
- pending or proposed mergers, acquisitions, divestiture or tender offers
- significant management changes
- similar information about other public companies
- prospective large block of trade in Anthem stock

## Material nonpublic or inside information about our company

Laws and company policies do not allow us to use or disclose material nonpublic or inside information for your personal financial benefit or the financial benefit of family, friends or others.

We must not buy or sell Anthem or other publicly traded companies securities if we know material nonpublic or inside information. In addition, we must not share or disclose material nonpublic or inside information with coworkers, family, friends or others.

Before trading in Anthem securities, company directors, officers and all associates should consult and comply with our public company policies.

Our Insider Trading policy is available at WorkNet/ Companywide Policies and Guiding Principles/Legal.

## Documenting and reporting information

All financial and business information, including supporting documentation, must be documented and reported accurately and honestly. Accurate and complete records are vital to our decision-making processes. Accurate and complete records are required in our collection and reporting of financial, legal and regulatory data.

Inaccurate financial or operational information provided in connection with certifications of government contracts and other entities is strictly prohibited.

In addition, undisclosed or undocumented (unrecorded) accounts, funds or assets are not allowed. Company funds should never be placed in any personal or non-corporate account. If you have any questions contact your manager.

## Media relations and public speaking

In order to provide accurate and complete information, you may not speak to the media, investment analysts, the investor community, or other external communication sources about any aspects of Anthem's business without first engaging and obtaining approval from Corporate Communications and/or Investor Relations.

In addition, associates are often invited to speak externally about our company, our products and services, the current political and regulatory environments facing our industry, and their subject matter expertise. These speaking invitations may be for open- or closed-door events, and can range from a keynote speech to moderating a roundtable, participating on a panel at an industry conference, or even hosting a webinar. These type of external speaking events, as well as the presentation materials must also be pre-approved by Corporate Communications.

These policies are available at WorkNet/Enterprise Shared Services/Corporate Communications.



## Use of company assets

We should only use company funds, equipment and other assets to conduct business, or for other reasons approved by your manager. Company assets, such as telephone and email, are to be used in a professional, productive, ethical and lawful manner. We must not use, sell or dispose of company assets unless allowed by policy.

**We do not have an expectation of privacy in the electronic messaging systems used during our employment or assignment with Anthem. Our communications may be reviewed as part of a legal matter, Ethics and Compliance investigations or whenever deemed necessary at the company's sole discretion.**

## Electronic assets

We use a variety of equipment to conduct our business. We must follow policies that relate to these assets. Limited personal use of some equipment is allowed as long as your manager approves and your personal use:

- does not affect productivity
- does not result in a direct, material cost to the company
- follows applicable company policies and the law

The policy on electronic asset use is located at WorkNet/Information Security policies.

Anthem has the right to review, copy, audit, investigate, intercept, access and disclose any use of the computer, email, Internet, Intranet, instant messages, voicemail and telephone including all messages created, received or sent for any purpose. The contents of electronic storage (including but not limited to email) may be disclosed within the company to those who have a need to know and outside the company (including law enforcement or government agencies), without your knowledge or permission.

## Passwords and access codes

Never share passwords or access codes with anyone. This policy can be located at WorkNet/Companywide Policies and Guiding Principles/Information Security/Information Security Policies, Programs, ISSM Standards & Guidelines.

## What are some examples of company assets?

- cash, checks and company credit cards
- buildings and fixtures
- office supplies
- computer hardware and software
- documents, information/data and records
- fax machines and copiers
- telephones and voicemail systems
- email, intranet and internet access

## Company assets may not be used for:

- illegal activity
- personal gain
- solicitation of personal business
- sale of any services or products other than Anthem's
- public advancement of individual views
- harassment of any type
- creating, viewing, receiving, sending or downloading chain email (including jokes)
- sexually explicit material
- communications that are inappropriate, inflammatory or derogatory

**Before destroying records, you are required to check the record retention policy to determine if the applicable retention period has expired. You must also check with your manager or the Legal Department to determine if the records are the subject of a Legal Hold Notice. If so, the records must be preserved and may not be altered or destroyed without approval from the Legal Department, even if the regular retention period has expired.**

### Q&A

- Q. *My son attends college across the country. Due to our busy schedules, it is hard to reach each other in the evenings. Is it okay for me to send him an email from work?*
- A. **Generally, this is okay if your manager has approved this type of activity. Check with your manager to determine what is allowed before engaging in personal use of company assets. Remember, there is no expectation of privacy. Email messages can be retrieved by the company. Do not send or receive communications that could be embarrassing to the company or yourself if reviewed later.**

## Software

We cannot copy or use illegal or unauthorized software on Anthem's electronic assets or computer networks. The IT Asset Management policy is located at WorkNet/Companywide Policies and Guiding Principles/Information Security/Anthem Workforce Information Security Program (WISP).

## Social networking

If you participate in electronic communication such as social network sites, blogs, chat rooms, Facebook, Twitter, Instagram, Periscope and similar forms of communication, you must not disclose Anthem's confidential information. You are expected to consider company guidelines and the ramifications of all of your communications, both internally and externally. You must also make it clear that the views you express are yours alone and not Anthem's views. The content of your messages may not be discriminatory or harassing towards any person or entity including other associates, managers, members, competitors or any business partners of the company. This policy can be located on WorkNet/MyHR.

## Record retention and destruction

We are committed to complying with the recordkeeping requirements of applicable laws. Destroying or disposing of company records is not at our individual discretion. The Anthem Records Management program governs record retention and the appropriate disposition of records once the applicable retention period has expired. In addition, records relevant to actual or anticipated litigation, or government investigations, may not be altered or destroyed and must be preserved.

Destruction or alteration of records to avoid disclosure in a legal proceeding, government investigation or audit is strictly prohibited and may constitute a criminal offense.

The Anthem Records Management Program is located at WorkNet/Companywide Policies and Guiding Principles/Records Management.



## On our own time

We are required to perform our responsibilities in a manner that furthers Anthem's interests. We must not compromise those interests due to actual or perceived conflicts with other business or personal concerns. A conflict of interest arises when your personal interests or activities appear to influence, or may influence, your ability to act in the best interests of Anthem.

The Conflict of Interest policy is available at WorkNet/Enterprise Shared Services/Legal and Compliance/Ethics and Compliance.



## Q&A

- Q.** *I work in Finance, and I am pursuing a career as a licensed Sales agent. I plan to get a second job with an external insurance agency and hope to sell health insurance products, including competitor's products. Does this situation create a conflict of interest?*
- A.** Yes. Your primary obligation is to Anthem. You also have access to confidential and proprietary information about Anthem products and customers. You will not be able to work for Anthem while also working as an agent for the competitor.
- Q.** *My spouse was recently hired in Customer Service and I work in Claims. We do not have a reporting relationship, and we are not in the same business unit. Is this a violation of policy?*
- A.** This situation as described does not create a prohibited relationship. However, you are required to disclose family members employed at the company, and any external personal and family member relationships whenever a prohibited relationship, a conflict of interest or the appearance of a conflict of interest occurs. If in doubt, discuss the situation with your manager or contact the Ethics Office for advice.
- Q.** *My spouse recently started a new position with a hospital that does business with Anthem. My position at Anthem may require me to interact with my wife in her role at the hospital. Do I need to report this information on a Conflict of Interest survey?*
- A.** Yes. In addition, you need to inform your manager of the situation. Depending upon the particular situation, the Ethics Office will work with you and your manager to help mitigate any potential risks created by your situation.

## Conflict of interest – disclosure

New and rehired associates must complete a Conflict of Interest survey within 30 days of receiving the assigned survey. Directors, officers, managers and associates on subsidiary boards of directors must complete a Conflict of Interest survey on an annual basis. In addition, when your job responsibilities, outside activities or personal relationships change, you are required to disclose any potential conflicts of interest to your manager and update your Conflict of Interest survey by contacting the Ethics Office.

## Conflict of interest – personal financial interests

You may not own, directly or indirectly, a significant financial interest in any business that does business with, seeks to do business with, or competes with Anthem. In general, a “significant financial interest” is ownership by you and/or an immediate family member of more than one percent of the outstanding securities/capital value of a business entity, or that represents more than five percent of your total assets and/or those of an immediate family member. If you have such an interest, you should discuss the situation with your manager and disclose the matter on a Conflict of Interest survey.

You must not refer customers, members, beneficiaries or those who do business with the company to an entity in which you or a family member has a financial or other material interest.

Some unique situations may qualify as an exception to this policy. The Ethics Office will address any exceptions on an individual case-by-case basis. Exceptions to this policy may require the written approval of the Chief Compliance Officer.

## Conflict of interest – family and personal relationships

Employment of relatives and individuals involved in personal relationships with associates is allowed as long as those individuals are the best-qualified candidates for the job, and it is not a prohibited relationship.

A prohibited relationship occurs if the hiring, promoting or transferring of your family member or someone with whom you have a personal relationship would result in the creation of a supervisory associate/subordinate relationship or the appearance of any other potential or actual conflict of interest.

### Some examples of a prohibited relationship include:

- a manager supervising a spouse, significant other, family member or anyone else with whom they have a personal relationship
- an associate overseeing a vendor or contractor that is a family member or with whom they have a personal relationship

**If you reside on a not-for-profit, charity, or external entity's board of directors and meetings occur during your regular Anthem business hours, your manager can approve whether or not you must use paid time off, etc. for these types of activities.**

We are required to disclose personal and family relationships whenever a prohibited relationship, a conflict of interest or the appearance of conflict of interest occurs. If a manager is in a personal relationship with a subordinate, he or she must disclose this to the company. Managers and Human Resources evaluate each situation and take appropriate action, if necessary.

You cannot make decisions involving the hiring, promoting, transferring, compensation, performance evaluation, corrective action or termination of family members or others with whom you have a personal relationship.

When the hiring, promoting or transferring of an immediate family member or someone with whom you have a personal relationship would result in a prohibited relationship, the company will not consider or accept applications for employment or your transfer or promotion.

### Conflict of interest - outside employment and other activities

Your primary employment obligation is to Anthem. Any activities such as a second job, a member of an external board of directors, or a personal business must not conflict with your obligations to Anthem. To ensure you avoid a potential conflict, you must notify your manager and disclose the matter on a Conflict of Interest survey. Your manager and the Ethics Office can help you determine if your outside activity is a conflict with your Anthem duties. In most cases we can develop a mitigation plan to help prevent any actual or perceived conflicts. In addition, you may not use company time, name, assets or the services of other associates for any outside activities unless authorized by company policy.

### Conflict of interest - someone close to you working in the industry

You may find yourself in a situation where your spouse, family members, or others close to you have a relationship with a competitor or another business in our industry. Such situations require extra sensitivity and need to be disclosed on your Conflict of Interest survey.



**Please contact the Ethics Office to request a new Conflict of Interest survey if you need to disclose a matter by sending an email to [conflictofinterest@anthem.com](mailto:conflictofinterest@anthem.com).**

## Political activity and contributions

When you engage in political or civic activities as an individual, in a personal capacity, you must represent your views as your own, and not as representing Anthem's views. Anthem Public Affairs serves as a resource available to all associates to answer any questions you may have about personal political activity including; relevant laws and how to avoid violating these laws, helping you to ensure that your personal political activity does not represent, or appear to represent, Anthem's views, and any other questions or concerns you may have. All associates, particularly those with external-facing roles, are encouraged to consult with Anthem Public Affairs with any questions with respect to their political engagement.

Federal and state laws, as well as the laws of some other countries, restrict the use of corporate funds and assets in connection with elections. You may not make any political contribution to a candidate, office holder or political organization for, or on behalf of Anthem, except through Anthem's Public Affairs Department. All political contributions made on behalf of Anthem require the approval of the Senior Vice President of Public Affairs. The term "political contribution" includes payments, provision of services, purchasing tickets or furnishing supplies for a candidate for political office.

Federal law also prohibits gifts to Executive and Legislative branch officials including, among other things, tickets, travel, food and logo items. Do not provide any gifts to a federal or state government employee unless you receive prior approval from Anthem's Public Affairs Department.

You may not use company property, facilities or time of any other Anthem associate for any individual and personal political activity unless authorized in accordance with established corporate policy. Anthem's senior management and Public Affairs associates may participate in political activity to fulfill their responsibilities as advocates on behalf of the company to the extent permitted by law.

You are encouraged to attend candidate forums, appearances by public officials, and other programs sponsored by the company. The Anthem Political Action Committee (PAC) contributes to selected political committees and candidates for office with funds contributed voluntarily by associates who wish to support the political process. Company funds are only used to pay the administrative costs of such programs to the extent permitted by law. In addition, where legally permitted, Anthem contributes corporate, non-Anthem PAC funds to selected political committees and candidates for office. All Anthem corporate contributions must be coordinated and approved through the Anthem Public Affairs Department.

If you have any questions about political contributions or activity, contact the Anthem Public Affairs Department. Anthem's Public Affairs Department information is also available at WorkNet/Enterprise Shared Services/Public Affairs.

## Lobbying/contacting elected officials, regulators or state government agencies

There are strictly enforced federal and state laws regarding contacting elected officials, regulators and state government agencies (referred to as covered entities). In addition, our contracts with federal and state agencies may include restrictions on lobbying or other contacts with elected officials and regulators. If you have a business need to meet with any of the above listed covered entities, you must first contact Anthem's Public Affairs Department for guidance. If you are contacting any of these covered entities outside of your official capacity with the company, you must let it be known that the views expressed are yours alone and not those of Anthem, Inc.

### Remember, when you participate in personal volunteer political fundraising or other political activities:

- do not conduct the activity on company time, rather the activity must be done on your personal time
- do not ask other Anthem associates to assist with such activities via Anthem resources (e.g., phone, email, etc.)
- do not use an Anthem return address, an Anthem email address or an Anthem business telephone number
- do not collect political contributions on company property
- use your own personal stationery and postage, or the campaign's stationery or postage
- type letters and political communications from home
- return any RSVP to the campaign, to a home office, a personal email address, or a personal telephone number, or to a post office box not associated with Anthem



## Conducting Anthem's business

We obtain business on the merits of our products, services and people. We strive to do business with organizations that also have high standards of business ethics and integrity. No matter what organization we are dealing with, or what its relationship is to Anthem, we must always observe the following general standards.

### **Fairness**

We all have a responsibility to deal fairly and honestly with anyone we do business with.

The manner in which we conduct our business relationships affects our reputation, builds long-term trust and contributes to Anthem's success.

## Community service

Corporate responsibility is intrinsic to fulfilling our vision to be America's valued health partner.

The Anthem Foundation is a private, non-profit organization wholly funded by Anthem, Inc. Through national and local grants, we partner with community organizations on initiatives that help transform health care with trusted and caring solutions.

Through charitable corporate contributions and local sponsorships, Anthem's Community Relations Investments strategically support and enhance our Foundation partnerships.

In addition to providing health-related grants, the Foundation also matches the funds that Anthem associates pledge through our Associate Giving Program, and encourages associate community engagement through our portfolio of volunteer programs. Through our disaster relief efforts and Anthem Cares Fund, the company supports our associates and communities in times of need.

## Environment

We are encouraged to minimize, reuse and recycle waste at our facilities, if possible. Consider the impact on the environment before printing. We can also help Anthem conserve energy by turning off computer monitors and unnecessary lighting after business hours.

## Gifts and special courtesies

Use good judgment and discretion to avoid even the appearance of impropriety or obligation in giving or receiving gifts and entertainment. We should be certain that any gift given or received, or entertainment hosted or attended does not violate the law, customary business practices or the Code.

## Gifts and special courtesies – acceptance

You and your family members may accept gifts or other special courtesies from external sources relating to company business, if:

- the acceptance will not compromise your ability to act in Anthem's best interests
- the value does not exceed \$100 per occasion
- it is reasonable, appropriate to the occasion, and accepted on an infrequent basis, regardless of the amount
- it is not cash or a cash equivalent, e.g. some gift cards (if can be redeemed for cash), honoraria, vouchers and some coupons are also considered cash gifts
- you disclose the gift or special courtesy to your manager
- the total value received from the same external source does not exceed \$200 in a calendar year
- you do not work in a Procurement business unit and are not involved in purchasing decisions
- you do not work in a business unit administering a government contract (exceptions that are more stringent may apply)
- individual departments should track their gifts received from external sources to monitor your gift policy compliance

Non-government business associates, including Procurement associates, may accept perishable gifts such as flowers, candy and fruit baskets valued in excess of \$100 if you obtain management approval and share them with your department. In some circumstances, honoraria may only be accepted by a donation to a charitable organization as long as the amount is reasonable in nature and is given in the name of the donating organization (not in Anthem's or the associate's name).

Generally, associates working in a business unit administering a government contract (federal, state or local) are prohibited from accepting or providing meals or anything of value from or to any beneficiaries, providers and government agents/representatives. However, modest items of food, refreshments or trinkets provided during a meeting or seminar may be accepted.

## Accepting prize drawings

Items given away in prize drawings at health fairs and industry conferences we attend may be accepted provided that:

- the event is a bona fide, legitimate giveaway
- 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
- the prize is not cash
- you are not placed under any obligation for having entered and winning the prize item (for example, an obligation to use a specific company's services or to provide the sponsoring company with your business attention)

In all instances, no matter what the value of a prize, if it might influence your decision making or otherwise compromise your ability to act in the best interests of Anthem, you may not accept the prize.

**We may accept gift cards from external sources if the gift cards cannot be redeemed for cash and do not violate our gift policy limits.**

### Q&A

**Q.** *A company vendor gave me a \$25 gift card to my favorite restaurant as a thank you for helping them meet a project deadline. Can I accept the gift card?*

**A.** *Yes, you can accept the gift card.*



### Q&A

**Q.** *A vendor sent me a gift basket of cookies valued at \$150 to thank me for helping on a project. Can I keep it?*

**A.** Yes, if your manager approves; you do not work in a business unit servicing a government contract, and you share the cookies with your department.

**Q.** *A business partner gave me two tickets to a college basketball tournament valued at \$125 each, and an invitation to use their suite at the stadium. The business partner will also be attending the games and at the suite. Can I accept the tickets?*

**A.** Since the business partner will be present with you at the event, this is not a gift. This activity falls under the business entertainment policy and would be allowable. Since the value of the tickets is over \$200, you would need your manager's approval to accept the offer.

If the vendor will not be present at the event, the tickets would then be considered a gift, and would not be acceptable due to the value of the tickets exceeding the \$100 gift policy limit.

## Gift and special courtesies – offering

You must never offer to give money directly or indirectly to influence, obtain or retain business. Such payments may be considered bribes or kickbacks that violate the law and company policies.

We may offer gifts to external sources provided that:

- the offer is for a legitimate business reason
- the value does not exceed \$100 per occasion
- it is reasonable, appropriate to the occasion, and accepted on an infrequent basis, regardless of the amount
- it is not cash or a cash equivalent, e.g. honoraria, vouchers and some coupons are also considered cash gifts
- you comply with the Finance Gift Card & Gift Certificate policy that prohibits offering gift cards and gift certificates to external sources (unless offered to members as part of an approved wellness incentive program)
- your manager pre-approves the gift or special courtesy offer
- the total value offered to the same external source does not exceed \$200 in a calendar year (unless offered to members as part of an approved wellness incentive program per the Finance policy noted above)
- you do not work in a Procurement business unit and are not involved in purchasing decisions
- you do not work in a business unit administering a government contract (exceptions that are more stringent may apply)
- the gift does not violate any laws, regulations or policies of the entity it was offered to

Individual business units should track their gifts offered to external sources to monitor your gift policy compliance. There are special rules for gifts to government employees as outlined in the political activity and contributions sections of this Code.

You may offer perishable gifts such as flowers and fruit baskets in excess of \$100 if reasonable, your manager approves, and given with the intent that they will be shared by more than one individual, such as a department.

If you work in Procurement, or a business unit administering a government contract, you are accountable for knowing and complying with your business unit's policy on gifts, special

courtesies, business entertainment, and applicable laws and regulations as more stringent exceptions may apply.

Offering gift cards to external sources is prohibited unless offered to our members as a part of an approved wellness incentive program. See the Finance policy on Gift Cards & Gift Certificates for further guidance at WorkNet/Companywide Policies and Guiding Principles/Finance and Actuarial.

In addition, associates who provide gifts or special courtesies to producers, consultants or other plan service providers for business governed by the Employee Retirement Income Security Act (ERISA) must comply with the rules for tracking and reporting such gifts and courtesies as outlined in Anthem's Broker Compensation Disclosure Policy, ERISA Disclosure and Reporting Policy and Travel and Entertainment Policy.

**Gifts purchased and expensed to the company that violate the gift policy dollar limits may be denied expense reimbursement, and corrective action may be taken up to and including termination of employment.**

### Q&A

**Q.** *My team would like to give a \$50 gift card to a provider's office manager for helping us identify a claim error. Are we allowed to give her a gift card?*

**A.** No. See the Finance policy on Gift Cards & Gift Certificates for further guidance.

## Discounts

Anthem may provide discounts if they are:

- of nominal value
- reasonable, based upon the circumstances
- only offered to existing members for health-related products or based on health-related activities, and the discount is not generally available to the public

Always check with the Legal Department to determine current requirements before offering a discount.

## Business entertainment

Our relationship with vendors, customers and prospective customers may include business entertainment functions. Business matters are discussed as part of business entertainment even where it is apparent that the event is not intended solely as a business meeting. Both an Anthem associate and the vendor, customer or prospective customer must be present at the event. Business entertainment includes, but is not limited to:

- meals
- charitable and sporting events
- golf, spas and parties
- plays and concerts
- industry conferences
- other events where business matters are discussed

We must display socially appropriate behavior during business entertainment events.

In addition, any business entertainment that involves foreign government officials must be reasonable and not violate the company's Global Anticorruption policy and various laws such as the Foreign Corrupt Practices Act, U.K. Antibribery Act of 2010 and various other countries' laws prohibiting bribery and corruption. Before participating in business entertainment, consult with your manager and review Anthem's Travel and Expense Policy.

### Q&A

- Q. *A vendor invited me to a round of golf and dinner to discuss their current contract performance and other related matters. Can I accept the offer?*
- A. Yes, if the value of the dinner and golf is over \$200, you must receive advance approval from your manager.
- Q. *I pre-purchased some professional basketball tickets to take a vendor with me to a game. I had an unexpected personal emergency, and now cannot go to the game with the vendor. I do not want these tickets to be wasted. Can I just give them to the vendor?*
- A. If the value of the tickets is under \$100, and you have not reached the \$200 annual limit in a calendar year with this vendor, you can give them the tickets as a gift.

If the tickets are greater than \$100 in value, you normally cannot give the tickets as a "gift," as it would violate our gift policy. You should instead find another associate(s) who could accompany the vendor to the game for business entertainment purposes. See the Travel and Expense Reimbursement policy, section 13.0 Discretionary Gifts and Awards, for policy exceptions.

### Q&A

- Q. *I bought 4 baseball tickets that cost \$150 each. I would like to take a customer to the game with me and my colleagues. Am I allowed to do that?*
- A. This may be considered business entertainment if an Anthem associate attends; the event has a valid business purpose; the customer is present; and the cost per person is less than \$200. Advance written approval is required from your manager for costs exceeding \$200 per person, per event. If the anticipated cost per event is expected to exceed \$3,000, advanced written approval must also be obtained from a Senior Vice President or above.
- Q. *I attended a conference sponsored by an Anthem vendor. All conference attendees were entered into a prize drawing for a portable music player. My name was drawn as the prize winner. Can I accept the prize?*
- A. As part of the business entertainment policy, you may accept the prize as long as everyone had an equal chance to win; it was not offered only to Anthem associates; and the prize is not redeemable for cash. You are responsible for investigating any personal tax implications. Remember that you must always represent Anthem's interests. Be sure that the prize is truly random, and that you are not 'winning' merely because you represent Anthem.

**Note:** if you work on a government business contract, more stringent rules may apply to gifts and business entertainment. You should always consult your manager to see if the activity is allowed.



Anthem's Travel and Expense Reimbursement policy requires management pre-approval for business entertainment over \$200/per person/event. Any business entertainment over \$3,000 must be pre-approved in writing by a Vice President, or higher level of management who reports to an Executive Vice President. Additional guidance can be found in the policy, which is available on WorkNet/Companywide Policies and Guiding Principles/Finance and Actuarial.

## Anti-rebating statutes – offering gifts to customers and potential customers

Anti-rebating laws prohibit any person representing Anthem from offering our customers or prospective customers the following in an attempt to solicit or induce the purchase of our products or services:

- employment
- shares of stock or other securities
- any advisory board contract, or any similar contract, agreement or understanding, offering providing for or promising any profits or special returns or special dividends
- any prizes, goods, merchandise or property of an aggregate value in excess of individual state guidelines or local law

Always check with your business unit's Legal support to determine individual states' current requirements.

## Antitrust Laws

We comply with applicable antitrust laws. We independently determine the pricing structure of our products and provider contracts, subject to applicable regulatory review.

Antitrust laws are intended to provide customers with a variety of products at competitive prices unrestricted by artificial constraints such as price fixing, illegal cartels and boycotts. Certain types of activities may raise special issues under antitrust laws. This includes but is not limited to:

- marketing programs, especially limiting distribution/sales channels, contracting with brokers/agents and terminating brokers/agents
- any exclusive provisions and contracts with suppliers, brokers/agents or providers
- selective contracting with providers
- membership and trade associations
- any joint venture or joint bidding agreement
- any sharing of confidential information with competitors
- any price protection (a/k/a most favored nation) contractual provision

Before engaging in these types of activities contact the Legal Department. The Antitrust Compliance policy is available at WorkNet/Companywide Policies and Guiding Principles/Legal.

## Kickbacks

We may not offer, provide or receive kickbacks of any kind. Anti-kickback laws impose criminal and civil monetary penalties on individuals and companies who offer or accept a kickback. Even an attempt to offer a kickback or an attempt to accept a kickback may violate the law.

A kickback is giving or offering anything of value in an attempt to induce referrals or as a reward for referring a person to a health care provider to receive services paid for by a health care program (includes state Medicaid and CHIP programs). The scope of this prohibition is far reaching and can include things such as: self-referrals by members in exchange for incentives and referrals to enroll in our products that receive federal or state funding. The laws prohibiting kickbacks are very broad and cover many of our relationships with vendors, providers, brokers and potentially even our members.

## Q&A

**Q.** *What does a kickback typically involve?*

**A.** *A kickback can be money, gifts, entertainment, services or anything else of value.*

## Procurement

We must maintain an honest, objective and efficient procurement process. The purchase of materials and services must be in accordance with our procurement policies.

Purchasing decisions must be based solely on predetermined selection criteria, including, but not limited to, quality, performance and price. Relations with suppliers must be maintained on an objective basis, free from the influence of gifts and favors. Associates who are in a position to influence purchasing decisions for Anthem must not engage in actions that might affect or appear to affect their procurement decisions' objectivity and impartiality.

All buying and selling decisions must be independent. To give preference to suppliers because they are also customers, or when an associate influences a supplier to become a customer, we are engaging in a practice known as reciprocity. Anthem's Procurement associates and other associates who are in positions to influence purchasing decisions for Anthem, must be able to recognize reciprocity and consult with the Legal Department and/or the Ethics Office about its implications when potential reciprocity is identified.

In addition, we have a Supplier Code of Conduct, which all of our vendors must adhere to while they are conducting business with and/or on behalf of Anthem. Vendors are responsible for ensuring that their employees and subcontractors adhere to our Supplier Code of Conduct. The Supplier Code of Conduct is located on the Internet at [Antheminc.com/Suppliers/Company Policy and Procedures](http://Antheminc.com/Suppliers/Company Policy and Procedures).



## Vendor relationships

External sources such as vendors, pharmaceutical manufacturers or physicians may offer cash, materials, services or equipment to be used for company activities like member or provider education and disease management programs. These outside sources may, or may not, have a current business relationship with Anthem. You may perceive these offers as an attempt only to assist us in our business. However, the offers have the potential to be perceived as bribes, kickbacks or unfair sales practices and could violate company policies and laws.

The following activities are not allowed:

- receiving cash directly or indirectly from an external source without any services or services of comparable value
- receiving products or services for free or at less than fair market value, such as:
  - materials to be distributed internally or externally
  - offers to perform member/provider mailings solely on our behalf at no cost to us
  - offers to provide research and data results at no cost to us
  - participation in joint activities, such as health fairs or other marketing activities
  - waiver of seminar fees
  - receiving anything with more than a nominal value from an external source, for which no payment or payment of less than fair market value by the company is involved

External sources such as charities, non-profits, professional societies, vendors, industry groups, public policy advisory groups and other external sources, may extend offers of paid travel and lodging expenses, waiver of conference fees, and compensation for participating in conferences, seminars or other meetings. Generally, if the sponsor is waiving the conference fees for all speakers at the event, and you are an invited speaker, then you can also accept the waived conference fees. However, any offers for honoraria, stipends or any other type of compensation offered must be declined.

### Q&A

**Q:** *My business unit wants to purchase a new application to help improve our processes. We know a vendor with a \$60,000 tool that we like. May we sign a contract with this vendor to buy the product?*

**A:** All technology agreements should be reviewed by Procurement regardless of dollar value. Purchases greater than \$50,000 require Procurement involvement and approval authorization. See the Procurement Policy for details.

**Q:** *Can we endorse a vendor's product?*

**A:** Our general policy is to decline vendor requests unless the circumstances warrant an exception to our policy. The Supplier Requests to Reference Anthem Company Names and/or Brands Policy allows for exceptions, which are granted on a case-by case basis. A vendor cannot use Anthem as a reference without an approved policy exception. This policy can be located at WorkNet/Enterprise Shared Services/Corporate Communications. Contact Corporate Communications with any questions regarding requests for endorsements or to request a policy exception.

**Q:** *A current vendor has offered to pay for our travel and lodging expenses to visit their headquarters. Can my team accept the offer?*

**A:** Generally, no, unless there is contractual language in the vendor contract covering the vendor paying for Anthem associates to conduct site visits, inspections or training. Anthem must pay for the expenses related to traveling to the vendor's locations for legitimate business reasons. The Ethics Office must review and approve any unique situations where a policy exception may be granted.

**Some limited offers of paid travel and lodging expenses from professional societies, charities, industry associations, public policy development groups and non-healthcare vendors may be allowed. Any offers extended to you by event organizers to pay for your travel/lodging expenses require review and approval from the Ethics Office. Contact the Ethics Office to review the offer before accepting.**

## Business relationships with pharmaceutical manufacturers

Any compensation or remuneration received directly or indirectly from a drug company is subject to both state and federal regulation because of the potential that such compensation or remuneration may influence, or appear to influence, our formularies, coverage levels, or other utilization management decisions. Before engaging in any activity that could result in compensation or remuneration from a drug company, please contact the Legal Department.

## Broker compensation

We are committed to disclosing all broker compensation. Our Broker Compensation Disclosure policy governs the compensation related to the sales and distribution of our products when using an external sales distribution system.

The policy applies to individuals and entities paid by Anthem. This includes, but is not limited to, any payments in the form of:

- standard and non-standard commissions
- override payments, bonus programs
- side arrangements and spot bonuses
- marketing, endorsement, association, services and royalty agreements
- trips and prizes
- non-monetary compensation in the form of meals, gifts and entertainment

The policy is available on WorkNet/Companywide Policies and Guiding Principles.

Due to the complexity of legal requirements, contact the Legal Department for guidance.

## Business agreements

All business agreements must be in writing and clearly state the services to be performed, the basis for earning the commission or fee, and the rate or fee.

## Other key laws that impact our business

### The Telephone Consumer Protection Act of 1991

The Telephone Consumer Protection Act of 1991 (TCPA) regulates the way we place calls and send text messages to consumers. Our policy is to comply with the TCPA and other related laws, and honor consumer requests to be placed on Anthem's Do Not Call list. Anthem's Telecommunications policy is located at WorkNet/Enterprise Shared Services/Legal and Compliance/Ethics Compliance and Privacy.

### Non-Discrimination under the Affordable Care Act

In the context of insurance contracts issued under the Affordable Care Act (ACA), health insurers cannot exclude from participation in, deny benefits of, or subject to discrimination any person based on race, color, national origin, sex, age (if 40 or over) or disability status.

With regard to offering group or individual health insurance coverage, Anthem cannot discriminate with respect to participation under the plan or coverage against any health care provider who is acting within the scope of that provider's license or certification under applicable State law. However, Anthem is not required to contract with any health care provider and is not prevented from establishing varying reimbursement rates based on a provider's quality or performance measures. Also, see our Prohibition on Discrimination in Marketing and Enrollment pertaining to government business contracts in the Doing Business with the Government section.





## Doing business with the Government

Much of our business comes from contracting directly with U.S. federal and state governments. While this section primarily deals with doing business in the U.S., you must be aware of laws and regulations wherever we conduct business.

When we work in a business unit with a U.S. government contract (federal, state or local), we must comply with the applicable laws and programs requirements. Specifically, Medicare, Medicaid, Federal Employee Program and the Health Insurance Marketplaces (state and federal) have separate regulations to follow. If you work in one of our business areas administering a government contract you should be familiar with those programs' requirements. If you are unsure of these additional requirements, contact your manager or business unit's Compliance team for guidance.



## Dealing with excluded persons

In our role as a government health care program contractor, Anthem may not employ or contract with individuals or companies that are barred from taking part in such programs, or receiving funds from such programs. To meet this obligation, we screen our associates, providers, vendors, and our first tier, downstream and related entities against exclusion lists kept by the Office of Inspector General (OIG) and General Services Administration (GSA) before hiring or entering into contracts.

We must also re-screen associates, providers and others on a regular basis. We also require first tier, downstream and related entities supporting state and federal health care programs to screen their employees and subcontractors against the OIG and GSA lists in the same manner.

You should consult with your manager or your business unit's Compliance team for the screening policies applicable to your business unit.

## Prohibition on discrimination in marketing and enrollment

Anthem does not take part in any discriminatory marketing, enrollment, medical management, benefit design, provider contracting, or other policy or practice designed to inappropriately prevent or discourage enrollment in a health plan, or require or encourage disenrollment from a health plan, by any eligible beneficiary based on race, color, ethnicity, national origin, religion, age, gender, gender identity, mental or physical disabilities, sexual orientation, genetic information, including pregnancy and expected length of life, present or predicted disability, degree of medical dependency, quality of life, or other health condition or health status.

Health factors that may not be considered for such marketing or enrollment purposes include medical condition, claims experience, use of health care service, medical history, genetic information, evidence of insurability and disability (subject to special rules relating to end-stage renal disease under Medicare Advantage plans).

Federal laws also forbid discrimination against providers that serve high-risk groups or that specialize in conditions that require costly treatment. We will not select or reject providers based on these factors.

All of our government sponsored health plans are subject to rules and restrictions on marketing and other promotional activities. These typically include requirements for state and/or federal agency review, and/or approval of marketing materials and activities. They also require that sales and marketing presentations fairly and accurately describe our services.

If these laws are applicable to your job responsibilities, you should seek guidance from your manager.

## False Claims Act and False Statements Act

The federal False Claims Act (FCA) allows the federal government to recover money received through fraud by government contractors, subcontractors or those participating in a government program. Under the FCA, individuals and entities are liable for three times the loss to the government, plus civil fines for each occurrence. In addition, the Deficit Reduction Act of 2005 provides incentives to states to enact their own false claims acts.

The FCA prohibits employers from retaliating against their employees who report fraud, waste and abuse to the governments, or who file a lawsuit on behalf of the government.

The False Statements Act prohibits anyone from making a false statement (written or oral) or withholding material information relating to a government contract.

Our non-retaliation policy protects Anthem associates from retaliation or retribution for making reports of known or suspected misconduct to the Ethics Office.

Please contact the Special Investigations Unit for their policies regarding fraud, waste and abuse and applicable false claims acts.. An overview of the False Claims Act and Deficit Reduction Act is also available on WorkNet/My HR.



## Stark law

The Stark law is an anti-referral statute that is directed specifically at physicians and prohibits them from making referrals for designated health services to an entity with which they or an immediate family member have a financial relationship. The penalties can be significant, including exclusion from the Medicare/Medicaid programs, and may potentially lead to violations of the False Claims Act. The definitions of “referral,” “designated health service,” “entity” and “financial relationship” are all quite broad. Contact the Legal Department regarding any concerns about Stark compliance.

The Anti-kickback and Stark laws overlap a great deal and are often used together by prosecutors to increase the penalties levied against a violator. In addition, violations of these laws are often the basis of False Claims violations and potentially other federal and state laws, thereby multiplying the penalties and risk significantly.

## Obstruction of a Federal Audit

We do not wrongfully influence, obstruct or impede a federal auditor in the performance of official duties.

## Procurement Integrity

The Procurement Integrity Act and Federal Acquisition Regulation restricts the activities of government contractors and individuals or companies seeking contracts with the government.

The following activities are not allowed:

- offering gifts to government officials or competing contractor
- discussing future employment possibilities with government officials or competing contractors
- offering to pay fees contingent upon the award of a federal contract to an employee or third party who holds itself out as being able to obtain the contract through improper influence

- soliciting or obtaining any proprietary information about competitors or source selection information from government officials that is not publicly available including, but not limited to:
  - proposed prices
  - source selection plans
  - technical evaluation plans
  - Anthem or competitors’ proposed prices or costs
  - Anthem or competitors’ approaches, processes, operations or techniques
  - Anthem or competitors’ information identified as contractor bids, proposal information or restricted data

The same guidelines apply when interacting with competitors.

## Truth in Negotiations Act

This law requires contractors negotiating contracts or subcontracts with the U.S. government (above a certain threshold) to disclose cost or pricing data and certify that the data disclosed is complete, current and accurate. Knowingly violating can result in criminal and civil penalties.

If you are involved in proposals with the U.S. government or a higher tier government contractor, you may be asked to sign such a certification. You should consult with the Legal Department before signing such a certification. It is important to retain copies of information related to costs or pricing that was provided to the U.S. government or a higher tier contractor. Typically, our U.S. government records are maintained for a period of at least ten years. Consult with the Legal Department with questions.



## Doing business across the globe

Whether based in the United States or in another country, we are responsible for conducting business in accordance with the laws of all impacted countries. We are subject to local laws, regulations and jurisdictions. Contact your manager, the Legal Department or the Ethics Office with questions.



## Bribery and corruption

Anthem prohibits any form of bribery or corruption, whether in commercial dealings with private parties or in dealings with officials of any government. We are committed to complying with the U.S. Foreign Corrupt Practices Act (FCPA), the U.S. Travel Act, the U.K. Antibribery Act and all other applicable anti-bribery laws.

We must not, directly or indirectly through a third party, make or offer anything of value to anyone in order to improperly obtain or retain business or improperly influence any action to benefit Anthem.

Anthem has adopted certain due diligence requirements that must be followed before Anthem engages a third party to act on its behalf in conducting international business. Anthem has adopted approval procedures that must be followed when giving gifts, entertaining and engaging in certain sales and marketing activities with foreign officials. These activities require prior review and approval. Contact the Ethics Office or the Legal Department if you have questions.

A copy of our Global Anticorruption Policy and a Guide to Due Diligence of Third Parties Conducting International Business On Behalf of Anthem, Inc. can be found at WorkNet/Enterprise Shared Services/Legal and Compliance/Ethics and Compliance.

## Anti-boycott

Anti-boycotting laws do not allow boycotting certain countries, goods and services, as well as discrimination.

## Barred countries/Office of Foreign Asset Control Screening

The Office of Foreign Asset Control publishes a list of Specially Designated Nationals and Blocked Persons. All U.S. companies must screen all individuals and countries they do business with against the lists to ensure that the company does not do business with individuals or entities on the lists (unless a license is obtained). We conduct such screening to ensure there are no electronic wire transfers or other payments made to affected countries, entities or individuals.

## Human rights

We support basic human rights. If you become aware that any party to our business transactions is denying basic human rights, you must report the concern. Denied human rights can include lack of access to food and water, forced labor, child labor and other illegal and/or unethical activities.

**We must not, directly or indirectly, make or offer bribes, kickbacks, or other payments of money or anything of value to anyone, including officials, employees, or representatives of any government, company, or public or international organization, or to any other third party, for the purpose of wrongfully obtaining, retaining or directing our business. This includes giving money or anything of value to any third party, where there is reason to believe it will be passed on to anyone involved in the business decision process for the purpose of influencing the decision.**

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## Acknowledgment

- I have received Anthem Ethics and Compliance training and have access to a copy of our Code of Conduct.
- I have read the Code of Conduct and understand its purpose and how it applies to me.
- I agree to comply with the Code of Conduct.
- I understand that strict adherence to Anthem policies and procedures is a condition of employment, and Anthem may take corrective action, including termination, for violations of such policies and procedures, including but not limited to the following:
  - The Code of Conduct
  - Anthem policies and procedures
  - Failure to report instances of non-compliance with the Code of Conduct
  - Applicable laws and regulations
  - Terms and guidelines of all government health care contracts
- I understand that a component of my annual performance review includes adherence to the Code of Conduct, policies and procedures, laws and regulations, terms and guidelines of government health care contracts, as applicable.
- I have a responsibility to discuss the importance of the Code of Conduct with associates whom I supervise, as applicable.
- I acknowledge that I have access to Human Resources policies via the Anthem intranet site and understand that I am responsible for reading and abiding by the policies and procedures listed therein and as amended from time to time
- I understand and acknowledge that the Company reserves the right to monitor my Internet access or usage, telephone conversations or transmissions, and electronic mail or transmissions. I further acknowledge and understand that I should have no expectation of privacy in emails stored on or passing through the company's email system, in my access or usages of Company assets, or in my usage or access to any other Company system. I also acknowledge and understand that my access or usage of Company systems is at the discretion of the Company and may be revoked at any time.
- I understand that reporting suspected or observed misconduct or other ethical concerns is a condition of employment. Reports and questions can be directed to my manager or the Ethics and Compliance HelpLine at 877-725-2702.

## Disclosure statement

1. Have you ever been convicted of a felony involving fraud, embezzlement, theft, dishonesty or breach of trust?  
 Yes  No
2. Are you currently excluded, suspended, debarred, sanctioned, or otherwise ineligible from participating in a Federal or State healthcare program (such as Medicare or Medicaid) or from contracting with the Federal government or a State government?  
 Yes  No
3. Have you ever been convicted of a criminal offense related to the provision of health care items or services?  
 Yes  No
4. Check this box if you would like to report a possible violation of the Anthem Standards of Ethical Business Conduct. By checking this box, you are requesting the Ethics Office to contact you.  
 Yes  No

## Confidentiality statement

I recognize that during my employment at Anthem, its affiliates and/or subsidiaries, I may have access to confidential, proprietary, private and/or material nonpublic information. Confidential, proprietary, private, and/or material nonpublic information includes, but is not limited to: medical, health and financial information about customers and their dependents; information not publicly available about Anthem's operations, associates, plans, development, financial information, purchasing, marketing, sales, provider contracts and costs, pricing, improvements, ideas (whether patented or not) that are related to Anthem's activities; personnel records including but not limited to information about associates' salaries, benefits, medical information and other personnel matters; and information about business customers and clients.

I understand that I am to protect the confidentiality of such Confidential Information that I have access to or am in possession of, both inside and outside of the physical locations of company offices, and that I will not directly or indirectly use or disclose this confidential, proprietary, private, and material nonpublic information unless permitted under Anthem's policies.

I understand and agree that all inventions, discoveries, ideas and improvements of any kind relating to the business of Anthem ("Inventions and Discoveries") that result from any work performed by me during the course of my employment with Anthem are the exclusive property of Anthem. I will promptly disclose these Inventions and Discoveries to Anthem and will assist Anthem in obtaining legal protection for these Inventions and Discoveries. I hereby grant ownership of all Inventions and Discoveries to Anthem, and I hereby assign, transfer and convey to Anthem the Inventions and Discoveries. I also understand that this agreement does not apply to any Inventions and Discoveries that qualify fully under the provisions of any law to the contrary.

I agree that all Anthem files and other records or data of Anthem in any form are the exclusive property of Anthem, and I further agree that upon termination of my employment, I will return to the company all manuals, letters, notes, notebooks, reports, customer or prospect lists, lists of employees, data, information or files which were in my possession or control during the term of my employment.

I understand that these obligations continue after my employment with Anthem ends. I understand that unauthorized disclosure of information may subject me to immediate termination and possible criminal and civil penalties.

Nothing in this statement or the company's policies is intended or will be applied in a manner to limit associate rights under the National Labor Relations Act.

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Signature (please sign clearly) Date

---

Printed name and department (please print clearly)

---

Your manager's name

Note: This form is completed online after completing the new associate and/or annual ethics and compliance training courses.

Anthem<sup>®</sup>



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