

SCAN Health Plan®

Code of Conduct

LETTER FROM CEO

Every day at SCAN we deliver on our mission to keep members healthy and independent. All of us, regardless of our job title, department or function, play a vital role in making this happen.

While our individual work responsibilities reflect specialized skills and duties, we all share a commitment to ethical and compliant business practices. In addition, our business is based on government contracts, so we must comply with the laws, regulations and policies that govern these contracts.

The SCAN Code of Conduct states our collective commitment to comply with the plan's regulatory and contractual requirements, and to do so through ethical practices. Our company policies and procedures and the information within the Employee Handbook support the Code of Conduct.

Please know that, with your signature on the attestation page at the back of this Code of Conduct, you are attesting to your understanding of and commitment to performing your duties in an ethical and compliant manner. This includes recognizing and reporting any potential compliance issues as part of ensuring a culture of accountability and compliance at SCAN.

With the Code of Conduct as our basic framework and our mission as our driving force, I have no doubt that SCAN will achieve its vision to be a leading health management organization that understands and meets the individual needs of those we serve and shapes the future of care for all seniors.



A stylized, handwritten signature in black ink, consisting of a large, flowing 'C' and 'W'.

Chris Wing
Chief Executive Officer
SCAN Health Plan®

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THE SCAN MISSION

Keeping Seniors Healthy and Independent

INTRODUCTION

In 1977, twelve passionate seniors decided it was time to improve access to quality medical care and personal care services. Their efforts resulted in the development of a new community organization designed to link seniors with a full spectrum of medical and social services. Thus, Senior Care Action Network (“SCAN”) was created. The founding mission and purpose of SCAN was to enhance the health, independence and dignity of seniors.

Over the years, SCAN has delivered on that mission and gained the trust of the communities we serve. This reputation has been well-earned by SCAN employees, who—working with SCAN’s regulators and business partners—conduct their daily business with integrity and efficiency, and always in service to SCAN’s members.

THE SCAN CODE OF CONDUCT

The framework for conducting business at SCAN is contained in this Code of Conduct¹. It is our commitment to professional integrity, legal compliance and ethical conduct. The Code of Conduct acts as an umbrella under which all of SCAN’s other standards of conduct (such as those outlined in the Employee Handbook) or other policies and procedures operate.

This Code gives us foundational values and standards and is built on the premise that we all know right from wrong. This means making our decisions and choosing our actions based on what we know to be right, according to all applicable laws and regulations, and according to the policies and procedures we all agree to follow as associates of SCAN.

The Code cannot contain all of the rules, policies and procedures we are each expected to follow. It cannot outline every possible situation in which the right course of action is not crystal clear. But it does give concrete guidance in specific areas and guiding principles to consider in other situations.

It should go without saying that we expect the highest standards of ethical conduct from every employee, Board Member, contractor, volunteer and other person affiliated with SCAN. Dishonesty in words or actions, or an intent to defraud anyone of money, property or honest services will not be tolerated.

- You are expected to represent SCAN honestly and accurately.
- You are expected to act with integrity.
- You are expected to treat others with respect—whether member, customer, co-worker, regulator, vendor, supplier or competitor.

Definition: The Code

Throughout this document, references to the Code of Conduct, or just “the Code,” encompass SCAN’s commitment to a culture of integrity, and incorporate all applicable Federal and state laws, statutes, regulations and sub-regulatory guidance, contractual commitments and SCAN policies and procedures.

¹Applies to SCAN Group and its affiliates with the exception of The SCAN Foundation

PUTTING “THE CODE” INTO ACTION

Employees, officers, Board Members, contractors, volunteers and other SCAN representatives are expected to conduct their SCAN responsibilities in compliance with this Code of Conduct. It is one of the ways we demonstrate—individually and as a company—that we are complying with the applicable federal and state standards, statutes, regulations, sub-regulatory guidance and contractual commitments.

If you become aware of a potential violation of this Code, the law or the plan’s policies—it is your duty to report it in a timely manner. If you are ever in doubt about the Code or potential violations of the Code, ask your supervisor for help. Complying with this Code, which includes the plan’s Employee Handbook and Compliance Program, is everyone’s responsibility and enables us to deliver on our mission.

YOUR PROTECTIONS

If you report a potential violation of this Code, your report will be kept confidential as permitted by law and to the extent possible consistent with our obligation to investigate and resolve your report. If you report through EthicsPoint, you can choose to remain anonymous. Another way to report potential violations of this Code is through the “Potential Compliance Issue (PCI)” tile on the “Report a Risk Issue” landing page on SCAN Central. (See pages 15–17 for more on reporting anonymously.)

SCAN maintains a strict policy of non-intimidation and non-retaliation for good faith actions, including, but not limited to, reporting potential compliance issues, conducting self-evaluations, auditing and remediating findings, and disclosing risk issues for further investigation. Please know that if you report a possible or actual compliance issue in good faith, we will protect you. Any SCAN employee who engages in intimidation and retaliation will be subject to disciplinary action up to and including termination. Refer to the Employee Handbook for additional information.

EthicsPoint

The “Report a Risk Issue” option in the Quick Links section on SCAN Central takes you to a page that identifies options for reporting various types of issues that may pose a risk to our members, providers, or the plan. You may anonymously report a potential violation of this Code by selecting the “Potential Compliance Issues (PCIs)” option on the “Report a Risk Issue” landing page in SCAN Central. This links to EthicsPoint for submitting information about the potential violation.

EthicsPoint is an independent organization dedicated to integrity at work. You can use the EthicsPoint hotline or website 24/7 to report issues related to non-compliance and unethical or illegal activities. You may use EthicsPoint to anonymously report an issue. You will create a password and receive a report key. These allow you to follow up on your report. And we do ask that you follow up regularly on reported issues. This allows us to get additional information from you and keep you updated as we investigate potential compliance issues.

EthicsPoint Hotline: 1-877-863-3362

www.ethicspoint.com: If you directly access the EthicsPoint website, enter “SCAN” in the organization name field, click on the “Submit” button, and then follow the simple, step-by-step instructions to either submit a report or to check on the status of a previously filed issue.

PRINCIPLES OF CONDUCT

SCAN is committed to providing the highest level of service to all our customers. It starts with a commitment on all of our parts to do our jobs right and to do them well. Beyond that, there are certain circumstances that arise with some frequency, so we have addressed them here. For more information, please refer to the specific sections of your Employee Handbook.

CODE OF CONDUCT VS. EMPLOYEE HANDBOOK

When you review your Employee Handbook, some of what you read here will be familiar. Here's the main difference between the two documents: The Code of Conduct reflects our values and directs the manner in which we carry out our business. The Employee Handbook is much more specific—it defines the rules for our actions and activities. For example, in the Code we talk about respect for our coworkers and business colleagues. In the Handbook we detail our policies against discrimination and harassment.

CONFLICT OF INTEREST

A conflict of interest is when employment or a relationship outside of SCAN (or other activities) create any actual, potential, or apparent conflict in your ability to do your job, and in particular your ability to make an objective decision that is in SCAN's best interest. Simply put, any such activities and relationships are not allowed without disclosing the potential conflict and obtaining consent beforehand from SCAN.

Examples of such conflicts of interest include, but are not limited to:

- Acting as a consultant, advisor, employee or independent contractor of/with a SCAN competitor, customer or vendor.
- Owning any significant interest (other than as a shareholder of a publicly traded company) in any business or organization that does or seeks to do business with SCAN.
- Using any company assets or resources for personal gain or advantage.
- Business dealings with relatives or close friends.
- Employment or supervision of relatives or friends. (SCAN does not prohibit this, but you must stick to the policy as stated in the Employee Handbook.)
- Investments and financial interests in business partners.

If you face such a situation, discuss it with Human Resources. By signing this Code of Conduct you attest that you are either free of any conflict of interest or that you have disclosed any potential conflicts of interest to SCAN. In addition, all employees with the position of director and above, including Board Members, must complete an attestation or certification related to conflict of interest at the time of hire and annually thereafter. See more on conflict of interest and employment of relatives in SCAN's Employee Handbook.

Is this a conflict of interest?

Q. One of my vendors told me her company is hiring entry level employees and my daughter, a recent college graduate, is looking for a job. What is considered appropriate in this case?

A. You can ask your vendor who your daughter should contact. She can then reference how she found out about the job. But that's the extent of it. You and your daughter have no right to expect, and the vendor cannot offer or extend, preferential treatment.

GIFTS / HOSPITALITY / ENTERTAINMENT

Our business transactions with vendors, suppliers, contractors and other third parties must be free from influence and even the appearance of influence. In general you cannot accept gifts and business courtesies unless specific conditions are met. Most important is that there are no strings attached. SCAN has a Gift and Business Courtesy policy that you can use to determine if a gift is appropriate—and how to request an exception if you think it's warranted.

INDUCEMENTS

At SCAN, you are not to use any financial or other type of reward that could be seen as trying to induce:

- Potential beneficiaries to join SCAN.
- Employees and other licensed professionals to deny or limit care.
- Beneficiaries to commit fraud, waste or abuse.

The use of incentives, bribes or kickbacks to induce such behavior is strictly prohibited by SCAN.

How much is too much when it comes to gifts?

Q. A vendor who does a lot of work for our department just offered my supervisor tickets to the Super Bowl. Can we accept?

A. Probably not. This type of gift has a very high value. Even if it's purely a "thank you" gesture with no strings attached, it could be misconstrued. Talk to your supervisor about it, or SCAN's Compliance Officer, if you would be more comfortable.

Hospitality or illegal activity?

Q. Some regulators will be on site next month and will be putting in full days at our offices. Can we provide lunch for them?

A. There are very strict guidelines regarding gifts and hospitality offered to government employees and public officials. Please check with the Compliance Officer to make sure what we see as a friendly gesture will not break any laws.

POLITICAL ACTIVITY AND LOBBYING

SCAN employees are free to participate in and contribute to political organizations or campaigns. You must, however, do so as an individual. You may not hold yourself out as a representative of SCAN in any of these types of activities, nor may you get reimbursed by SCAN for anything related to these activities.

Since SCAN is a tax-exempt, non-profit organization, we must follow guidelines of that section of the Internal Revenue Code. Part of that section states that “No substantial part of the activities of the corporation shall be carrying on of propaganda or otherwise attempting to influence legislation (lobbying)...and the corporation shall not participate in, or intervene in, any political campaign (including the publication or distribution of statements) on behalf of any candidate for public office.” We expect you to refrain from taking part in any activity that would jeopardize the tax-exempt status of SCAN.

SCAN has many contacts and dealings with governmental bodies and officials. Our efforts are focused in our areas of expertise and consist largely of making recommendations concerning legislation or regulations being considered. In addition, we may analyze and take public positions on issues related to the operation of SCAN. These efforts are coordinated through our Public & Government Affairs department and are within the scope of Internal Revenue Service rules. If you have any questions about lobbying and political activity please contact the Public & Government Affairs department.

Is this a business dinner or a political event?

Q. I bought tickets to a fundraising dinner for a local politician. I took a colleague and we did discuss business. May I expense it?

A. No. Reimbursing you for funds given to a specific candidate would be the same as contributing to his/her political campaign, which SCAN is not allowed to do.

CONFIDENTIALITY

We work in an industry that contains highly sensitive information—the confidentiality of which is also highly regulated. Every SCAN employee must be aware of what confidential and proprietary information is, and maintain the security of both company and member information according to the rules, regulations, and sub-regulatory guidance provided by the government (as well as other legal and ethical standards). To review our full policy, see the section on Confidentiality in the Employee Handbook.

Confidential means that it is not appropriate for general public knowledge; it may cause harm to an individual or organization if that information becomes public knowledge.

Proprietary means that it is related to or involves SCAN. Other companies and individuals would also have proprietary information specific to them.

SCAN’s confidential and proprietary information is nonpublic information that is created, recorded, or used in support of SCAN business. It involves much of our daily work processes and outputs—including SCAN’s plans and strategies.

Our members’ confidential and proprietary information is called “Protected Health Information,” or “PHI.”

SCAN COMPANY INFORMATION

In general, you should discuss proprietary information with co-workers on a “need-to-know” basis. Your HIPAA (Health Insurance Portability and Accountability Act of 1996) training included information on these two important concepts:

- **Role-Based Access** means you have access to certain information depending on the tasks you perform at SCAN. That same access may not be granted to your co-worker.
- **Minimum Necessary Requirement** means that you use or disclose only the information necessary to satisfy a particular purpose or carry out a function.

For requests for information from persons outside SCAN, follow your job-specific procedures for requesting and granting confidential information.

A good guideline to use is that if it is on www.scanhealthplan.com, in the “About SCAN” section, then it’s public and you can direct any interested parties to that information. If you have questions on anything else, talk to your supervisor.

You should never discuss any confidential information (Protected Health Information [PHI] or otherwise) at all in social or routine business conversations. Again, refer to the policy on Confidentiality in your Employee Handbook.

Conversation or confidential information?

Q. At a family event a relative was asking me very specific questions about SCAN open enrollment and membership and what we learned at our latest Employee Straight Talk forum. What’s okay to share?

A. Membership numbers are public information. We include those on every press release. Whether those numbers are relative to our goals, however, is not public information. Straight Talk information is for employees, but you are always welcome to ask questions at these events, so ask if it’s okay to share something specific you may have learned.

PROTECTED HEALTH INFORMATION AND PERSONAL INFORMATION

Protected Health Information (PHI) and Personal Information (PI) are highly sensitive information of our members and we have an obligation to protect it. PHI is information that identifies a member and relates to his/her past, present, or future health or condition, provision of care, or payment for care.

Examples of member information include member name, social security number, SCAN ID number, telephone/fax number, addresses (including email) and dates, such as birth date.

PI is a combination of a member’s name with personal information such as social security number, driver’s license number, SCAN ID number, credit card number, or passwords.

There are some SCAN employees who never or rarely come across PHI/PI. For others, their jobs may revolve around processing PHI/PI. Regardless, we are all responsible for protecting our members’ health and personal information. You must always abide by your job-specific procedures for handling and protecting PHI/PI.

In general, follow these PHI/PI guidelines

Written PHI/PI

- Keep it out of view of others and properly store it in locked drawers when not in use
- Use shredding bins to dispose of paper documents containing PHI/PI
- Do not take PHI/PI out of SCAN without prior supervisor approval
- Retrieve documents containing PHI/PI immediately from printers or fax machines
- Remove abandoned documents with PHI/PI that you find in common areas and give them to your supervisor or the Privacy Office

Verbal PHI/PI

- Avoid discussing PHI/PI in public areas (e.g., hallways, elevators, break rooms, etc.)
- Be mindful of those around you when discussing sensitive information over the phone

Electronic PHI/PI

- Lock your workstation when stepping away using Ctrl+Alt+Del or the Microsoft icon key+“L” key
- Encrypt and double-check email attachments and recipients when PHI/PI is sent externally
- Do not click on unfamiliar links or open attachments from someone you do not know
- Save PHI only on network drives

Report any suspected breaches of PHI or PI to SCAN’s Privacy Officer or to the Compliance department.

Many employees have access to other member (and, for that matter, employee and vendor) information that, while not considered PHI/PI, must also be kept confidential. Refer to the Employee Handbook section on Confidentiality for more detail.

What do I do about repeated requests?

Q. My co-worker keeps asking me for more information than I think she needs to do her job. Do I just keep saying no?

A. Try to find out why she thinks she needs the information in question. If she needs it to do her job, then it is appropriate. If not, then you need to remind her of SCAN’s PHI policy. If you can’t come to agreement between the two of you, talk to your supervisor.

SCAN ASSETS

It's easy to remember: If SCAN supplied it to you it is SCAN's property and considered a SCAN asset. Be aware, too, that assets include more than just equipment and supplies. SCAN records, financial data, research results, business strategies, etc., are also assets to be protected. The Employee Handbook includes more information on SCAN property and rights to inventions.

PHYSICAL PROPERTY

While it is SCAN's responsibility to maintain equipment, it is your responsibility to take care of it and report any problems or issues.

For the most part, SCAN property must remain on-site unless approval has been given to remove it—or it is part of your job function. It should go without saying that taking or using supplies, materials or equipment for personal use is dishonest and not allowed.

What if it's for a good cause?

Q. I volunteered to make flyers for the local animal shelter. May I use my department's machine to make photocopies? What if I bring my own paper?

A. No, sorry. Unless it's for an organization or event SCAN is supporting, you may not and should not use plan assets to promote it.

ELECTRONIC COMMUNICATIONS SYSTEMS AND SOCIAL MEDIA

In the Employee Handbook you will see a robust policy on the use of electronic communications systems and social media. Please read it thoroughly. This is an area that is growing and changing quickly so we simply cannot anticipate all challenges. But again, you can help ensure appropriate use by using SCAN's electronic communications systems for business purposes only. For social media, make sure that your participation on external social media sites is done on your time and that you limit the references made to SCAN and the work you do here.

Can I post good news?

Q. I'm a case manager and I love to post updates of some of my favorite members on my Facebook® page. Is this okay?

A. No, it's not. Remember, once you send information electronically, you have no control over where it will end up. Your posts could inadvertently include PHI or company information about the services we provide.

INTELLECTUAL PROPERTY

Intellectual property ranges from the SCAN logo to trade secrets to any programs you may have helped to develop. Like physical assets, intellectual property belongs to SCAN and must be used only as designated. When you leave and are no longer affiliated with SCAN, all SCAN property, resources and confidential information must remain with SCAN.

Finally, SCAN also respects the confidential and proprietary rights and intellectual property of other companies and individuals. We abide by all applicable laws regarding copyright, trademarks, privacy and financial disclosures. We follow fair business practices, which means we do not use improper channels to glean information about competitors, nor do we spread false information about them.

DEALING WITH AN “EXCLUDED PERSON OR ENTITY”

An excluded person or entity is one that is not allowed to participate in Medicare, state Medicaid or any federal health care programs for any reason. Most commonly, these are individuals that have been found guilty of fraudulent billing or misrepresentation of credentials. SCAN cannot, directly or indirectly, employ or contract with any excluded person or entity. SCAN must ensure that no persons or entities contracted or affiliated with SCAN are “excluded.” If a person or entity contracted with SCAN becomes excluded, SCAN must immediately stop such person or entity from directly or indirectly providing any covered services for reimbursement to SCAN members. To read about our policy on this issue, please refer to SCAN’s policy regarding Office of the Inspector General (OIG) Excluded Individuals/Entities, General Services Administration (GSA) Excluded Parties and Medicare Opt-Out Provider Exclusion Review.

THE SCAN COMPLIANCE PROGRAM

SCAN contracts with federal, state, and local government agencies to administer covered services for beneficiaries. We administer these services to beneficiaries in accordance with SCAN’s contractual and regulatory requirements as set forth by governing federal, state and local agencies. The SCAN Compliance Program helps ensure that SCAN has systems and processes in place to be compliant with the laws, regulations, regulatory guidance and contract provisions that we are required to follow. Everyone has a role to play in making our Compliance Program effective.

The 5 things you need to know about Compliance

1. We are all responsible for compliance and are obligated to report potential compliance issues.
2. If you don’t understand something, speak up!
3. If you suspect a compliance issue, report it!
4. All reports are investigated and treated confidentially.
5. Anyone who makes a report in good faith will be protected from retaliation and intimidation.

YOUR RESPONSIBILITIES AND OBLIGATIONS

The first step is to understand that you are responsible for and obligated to help prevent, detect and correct instances of potential non-compliance. To make sure we are able to recognize and properly handle potential non-compliance issues, SCAN is committed to:

- All-employee compliance training.
- Job-specific training and education.
- Implementing our policies and procedures.
- Enforcing our standards through disciplinary actions.
- Routine auditing and monitoring.
- Communicating on general and specific compliance topics.
- Reporting compliance activities to the Enterprise Compliance Committee, the Compliance Policy Committee, and the SCAN Group Audit and Compliance Committee.
- Proactively monitoring performance in meeting regulatory standards, and self-disclosing non-compliance to federal and state regulators.

POTENTIAL COMPLIANCE ISSUES

Potential compliance issues exist when a business process or behavior does not follow or is inconsistent with the plan's Code of Conduct, laws, regulations, sub-regulatory guidance, and/or policies and procedures.

FRAUD, WASTE, AND ABUSE (FWA)

Fraud, waste and abuse are special types of potential compliance issues. FWA is a big problem in the Medicare and Medicaid Programs and we are obligated to report any FWA issues we see in our day-to-day jobs. FWA can be committed by various entities, including but not limited to providers, brokers, health plans, pharmacies, pharmacy benefit management companies, our members, and even our fellow employees.

In addition, it is illegal to knowingly present, or cause to be presented, a false or fraudulent claim or statement to the government (False Claims Act). False claims, fraud, dishonesty, or criminal conduct of any sort, on the part of any employee, officer, director, or anyone doing business with SCAN will not be tolerated. For more information about the plan's FWA policy, refer to the Employee Handbook.

Do we report on our members?

Q. I think a member let someone else use her SCAN ID card. Should I call her to double check?

A. No. This could be member fraud. So report it, along with the details that made you suspicious in the first place.

Here is the definition of FWA:

Fraud. An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable federal or state law.

Examples: Double-billing, forging or altering prescriptions, and billing for more expensive procedures than were actually provided.

Waste. To use health care benefits or spend health care dollars in a careless or needless manner.

Examples: Duplicative, inappropriate or unnecessary tests and procedures; preventable hospital readmissions; and medical errors.

Abuse. Practices that are inconsistent with sound fiscal, business, or medical practices, and result in an unnecessary cost to the Medicare, Medicaid or SCAN programs.

Examples: Reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care.

SCAN'S FRAUD, WASTE, AND ABUSE (FWA) PROGRAM

As part of the overall Compliance Program, SCAN conducts various anti-fraud activities that are administered by its Special Investigations Unit (SIU). The purpose of the plan's FWA Program is to increase awareness about and improve the prevention, detection, investigation, and prosecution (as applicable) of confirmed fraud, waste, and abuse. Every employee is trained on FWA when newly hired and must take a refresher course every year as part of the compliance-required trainings. Our vigilance in this area can help protect SCAN and our beneficiaries, and help maintain the overall quality and affordability of health care services.

A provider mistake or member abuse?

Q. I was processing a member claim and noticed the first name is different—the member is male but there's a woman's name on the claim. The doctor's office probably made a mistake, right?

A. Don't assume it's a mistake—report it. The member may be trying to get reimbursed for care someone else received.

Delivering quality care or abusing the system?

Q. I've noticed one physician orders extensive lab work regardless of the members' diagnosis. Is he just being extra thorough or is this an issue?

A. You need to report this so we can find out. Ordering and getting reimbursed for unnecessary tests is provider abuse.

HOW TO REPORT A POTENTIAL COMPLIANCE ISSUE, INCLUDING FWA

All employees, officers, Board Members and other persons affiliated with SCAN have a duty to immediately report potential compliance issues, which includes suspected FWA and violations of this Code. You have several ways to report a suspected violation:

- Your supervisor. Supervisors have an affirmative obligation to, in turn, report the suspected violation to Human Resources and/or Compliance.
- Human Resources staff.
- The Compliance Officer or your department's assigned Compliance Specialist.
- Via the "Report a Risk Issue" option in the Quick Links section on SCAN Central. This will take you to a page that identifies options for reporting various types of issues that may pose a risk to our members, providers, or the plan. You may anonymously report any risk issue by selecting the "Potential Compliance Issues (PCIs)" tile on the Report a Risk Issue landing page.
- You may directly contact EthicsPoint by phone at 1-877-863-3362 or online at www.ethicspoint.com (allows you to anonymously report an issue).

What if I see a potential FWA incident outside of SCAN?

Q. I was at a meeting with a broker and I learned that he misrepresented SCAN to a member. What do I do?

A. Bring this to your manager's attention immediately. If it was an honest mistake, that's one thing. If it's a pattern of fraudulent behavior, that's something very serious.

COMPLIANCE FAQS

How do I know if something is a potential compliance issue?

A potential compliance issue exists when a business process or behavior does not follow or is inconsistent with this Code, laws, regulations, sub-regulatory guidance, and/or policies and procedures. One of the purposes of our compliance-related training classes and annual refresher courses is to help you identify these situations.

For example, if SCAN is required to notify all members of the changes in their benefits by October 1 of each year but it looks as if we won't get the information mailed until October 15—that's a potential compliance issue.

What if I don't understand a rule or regulation?

Not understanding does not excuse you from complying. If you don't fully understand a rule, regulation, policy or procedure: Speak up! There are several ways to get clarification:

1. Ask your supervisor. It's his or her job to explain it clearly.
2. Ask your department's assigned Compliance Specialist.
3. Submit your question to Compliance411@scanhealthplan.com and Compliance staff will respond.
4. Ask the Compliance Officer.

What do I do if I suspect a potential compliance issue?

We embrace the concept of shared compliance at SCAN. That means we are all responsible for it, regardless of job title or responsibilities. If you suspect a compliance issue, you are obligated to report it as soon as possible. You do not have to find out many details, but you do need to have the basic facts: who, what, when, and where.

How do I report a compliance issue?

Report the issue to your supervisor—unless of course it is your supervisor who is involved. If that's the case, then use one of these options:

1. Click on the "Report a Risk Issue" option in the Quick Links section on SCAN Central and select the appropriate issue reporting tile on the landing page.
2. Human Resources staff.
3. Your department's assigned Compliance Specialist.
4. Submit directly to EthicsPoint by calling 1-877-863-3362 or going online at www.ethicspoint.com (allows anonymous reporting).
5. SCAN's Compliance Officer.

What happens if I don't report something that turns out to be a compliance issue?

You are obligated to report. If you have been through SCAN compliance training—and you are required to go through it both as a newly hired employee and annually thereafter—you will be able to identify potential compliance issues. If you do not report a situation that you reasonably should have identified as a potential compliance issue, you will be subject to disciplinary action. That's why we make it as easy as possible for you to report potential compliance issues. As noted here, you have several ways to report and can even do so anonymously.

What happens after I report a potential compliance issue?

To most of your co-workers and other employees it may seem like nothing is happening. But every reported issue will be investigated. Documents are reviewed, the people involved are interviewed, and you may be asked for additional, clarifying information. The results of the investigation may be presented to the SCAN Enterprise Compliance Committee, the CEO, and/or the SCAN Group Audit and Compliance Committee. SCAN may also use the information to self-report a compliance issue to CMS. The actions taken as a result of the investigation will depend on the severity of the issue. It could be something as simple as implementing a new policy or procedure. Or it could include disciplinary action up to and including immediate termination of those involved.

Will I be treated differently if I report a potential compliance issue?

No. There should be no difference in your workplace duties, responsibilities or relationships. In fact, SCAN has a policy against retaliation and intimidation. SCAN will not tolerate anyone retaliating against you or trying to intimidate you when you have reported something in good faith. (On the flip side, however, knowingly making a false report is a very serious issue—one that will be addressed through disciplinary action up to and including termination—so "in good faith" is the key here.) If you feel you are being retaliated against or intimidated, contact Human Resources, the plan's Compliance Officer, or report this issue using the "Potential Compliance Issue (PCI)" tile in the Report a Risk Issue page on SCAN Central.

May I just submit an anonymous report and be done with it?

Almost. The best way to report anonymously is through EthicsPoint, which can be readily accessed by selecting the “Potential Compliance Issue (PCI)” tile on the Report a Risk Issue landing page on SCAN Central. This allows us to ask you for more information while still maintaining your anonymity. You are expected to check in regularly to see if there are any questions you need to answer. You will be asked to log on or call in using the report code and password set up when you made the initial report.

Why do I have to take compliance training every year?

Ensuring compliant performance and ethical conduct, which includes meeting our legal and contractual obligations, is a requirement and not an option for us at SCAN. Annual compliance training is a CMS standard that we require all SCAN employees and plan representatives to complete. If you don't timely complete the required trainings set forth in the plan's compliance training policy, you will be subject to disciplinary action. Because regulations and requirements change, we work to keep the plan's training courses up-to-date and relevant. The better trained you are, the better you will be able to spot potential compliance issues and know what to do once you see them.

What obligations do I have as a manager?

Q. One of my employees just came to me with something he thinks is a potential compliance issue. I'm not sure it is. What do I do?

A. Talk to your supervisor to get clarification. Or, if you prefer, you or the employee who brought it to your attention can report it through various means including but not limited to accessing the “Potential Compliance Issue (PCI)” tile on the “Report a Risk Issue” landing page on SCAN Central, contacting the Compliance Officer, informing your department's Compliance liaison, or filing this issue directly via EthicsPoint. The employee did the right thing by reporting it to you so it is your responsibility and affirmative obligation to report the suspected violation to Human Resources and/or Compliance.

Approved by the SCAN Group Board of Directors on December 9, 2015

SCAN CODE OF CONDUCT ATTESTATION

By signing this Attestation, I acknowledge that:

1. I understand that this attestation is a condition of my employment with SCAN.
2. I have received a copy of the Code of Conduct.
3. I have read and understand the Code of Conduct.
4. I will comply with the Code of Conduct and SCAN's Employee Handbook, which includes the Conflict of Interest policy.

Signature: _____ **Date:** _____

Print Name: _____

Return to: Your Supervisor