



Code of Business Conduct and Ethics



Code of Business Conduct and Ethics Table of Contents

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While the Code of Business Conduct and Ethics (the Code) makes reference to many of our corporate policies, it does not contain all of the policies by which you must abide. Nor does the Code detail the provisions of any policy. The corporate policies may be found on Connections, the Company intranet site. Each division or department may maintain policies that apply to you. If you need help understanding these policies, or locating them on Connections, please speak to your supervisor or contact the Compliance and Ethics Office.

The Code and the policies described in it are not an employment contract. The Company does not create any contractual rights by issuing this Code or its policies. Following this Code is a condition of employment and, generally, of doing business with the Company.

A Message About Our Code of Business Conduct and Ethics: Your Role in Fulfilling Our Mission, Vision and Values

Our customers know and value Horizon for the quality of our products and services and the caliber of our people. They entrust us with their needs for health care coverage and the security that comes from knowing they are protected.

We honor their trust when we conduct our business with fairness, honesty, transparency and a commitment to doing the right thing with every interaction we have with each other, our customers and business partners. We act with integrity and urgency with every interaction, to strive for a culture of excellence, and dedication, to provide peace of mind for those who depend on us and the communities we serve. Our Values represent what Horizon stands for -- the beliefs that drive our work and culture and serve as the foundation for our individual behaviors.

Our Code is a guide to all of our behavior and outlines your role at Horizon. You are expected to read and make a personal commitment to follow our Code. Horizon expects you to always do the right thing, including protecting our members' information by understanding and following our Private Information (PI), Protected Health Information (PHI) and Minimum Necessary requirements. No matter how busy we are, we must always take the proper steps to safeguard our members' information.

Nothing should compromise the integrity of your efforts to follow the Code. If you know of or suspect a violation of the Code, you have an obligation to report that violation. Remember, you can always report anonymously through the Compliance Integrity Help Line at **1-800-658-6781**. Under no circumstances will you ever face retaliation of any kind as a result of raising a good-faith concern about a potential violation of our Code.

As we continue to drive innovations that improve health care quality, affordability and member experience in the markets we serve it is of the utmost importance that you always remember that compliance and doing the right thing - must be a part of everything you do.

Thank you for embracing the values, principles and practices expressed in the Code, and for remaining committed to serving our customers. Read on to learn about how your role helps us to achieve Our Mission, Vision and Values.



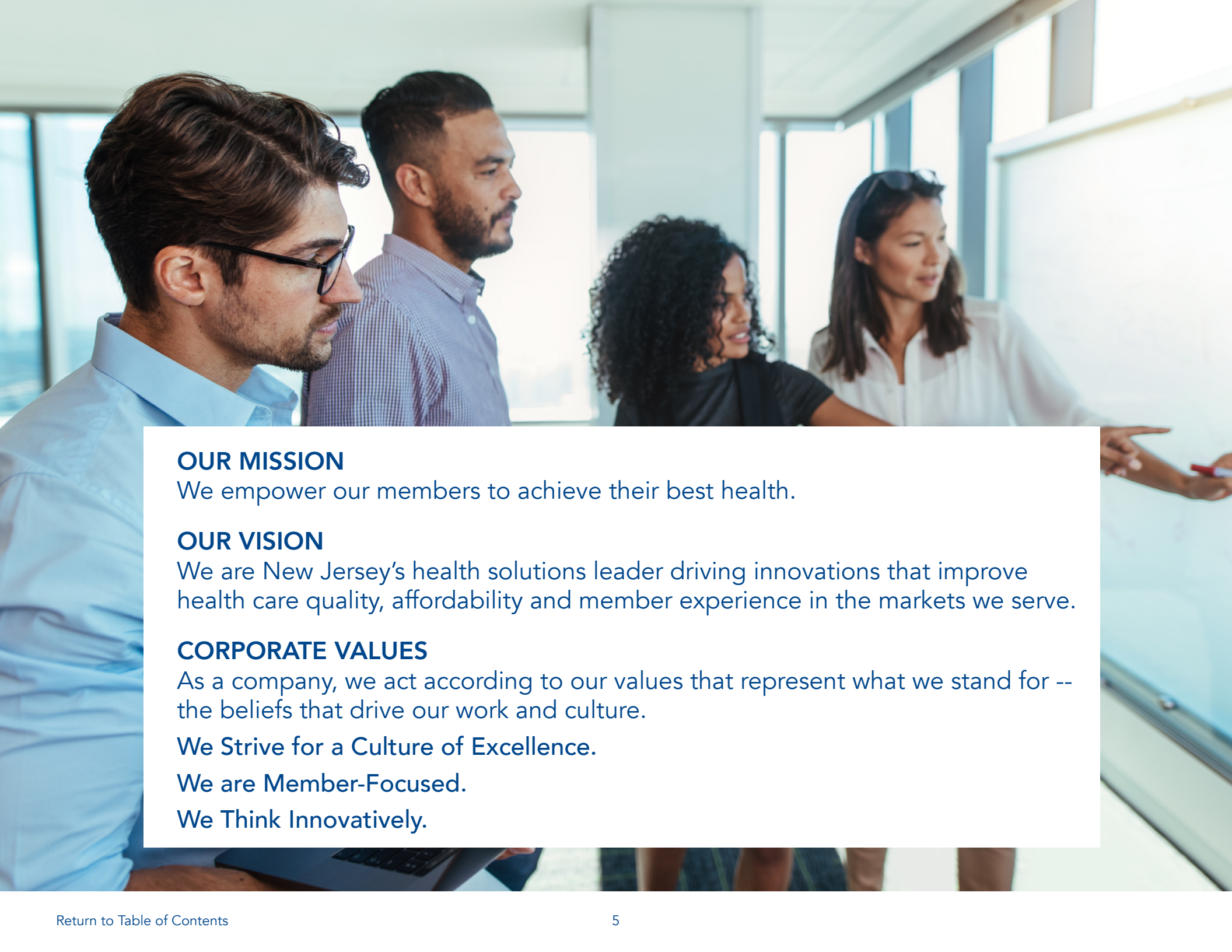
Gary D. St. Hilaire
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Horizon



Cassandra Santos
Chairperson,
Audit, Compliance and
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Audit, Compliance and Risk

A photograph of four diverse professionals in a modern office setting. In the foreground, a man with dark hair and glasses, wearing a light blue shirt, is looking towards the right. Behind him, another man with a beard and short hair, wearing a purple checkered shirt, is also looking right. In the background, two women are visible; one with curly hair in a black top and another with long hair in a white shirt, both looking towards a whiteboard on the right. The office has large windows in the background, letting in natural light.

OUR MISSION

We empower our members to achieve their best health.

OUR VISION

We are New Jersey's health solutions leader driving innovations that improve health care quality, affordability and member experience in the markets we serve.

CORPORATE VALUES

As a company, we act according to our values that represent what we stand for -- the beliefs that drive our work and culture.

We Strive for a Culture of Excellence.

We are Member-Focused.

We Think Innovatively.

We Lead with Integrity

Horizon is driving innovations that improve health care quality, affordability and member experience in the markets we serve. To continue this evolution, every employee, Board Member, agent, independent contractor, temporary employee, consultant and other business associates must act honestly, ethically and in full accordance with all federal and state laws and regulations. Our members trust us to do business with honesty, integrity and excellence and in compliance with all legal requirements. Our Mission describes your role as a vital part of Horizon and contains guidelines for you to follow in your daily activities in order to fulfill Our Mission. To keep the trust that our members place in us, your actions must always be guided by good judgment and strong ethics, and must avoid even the appearance of improper behavior. No one is permitted to commit an illegal or unethical act, or ask others to do so, for any reason.

The business person in charge of the relationship with a third party should consult with the Compliance and Ethics Office to determine how the Code applies to that third party. Vendors and contractors must act in accordance with the principles described in the Horizon Vendor Code of Business Conduct and Ethics.



Your Role in Leading with Integrity

- Follow and promote the principles contained in the Code.
- Certify annually that you have read, understand and will fully comply with the Code.
- Sign an annual conflict of interest questionnaire and update your answers on the questionnaire, if needed, during the year.
- We take initiative to resolve challenges and address root causes of issues.
- Read, understand and comply with all Company policies, including those that apply to your division or department.
- Comply with the spirit and the letter of all applicable laws, rules and regulations, both state and federal, including those for the Medicare and Medicaid programs.
- Exercise good judgment and avoid even the appearance of improper behavior.
- Identify and properly manage compliance and Enterprise risks.
- Seek advice if you have any ethical or compliance concerns.
- Interact with all state and federal regulators and regulatory agencies in a respectful and ethical manner.
- Complete all mandatory training timely.
- Report any violations, or suspected violations, of the Code or any law, regulation or Company policy, including any suspected fraud or abuse.





Your Role: Supervisors and Managers

- Promote compliance and ethics by example – show your team what it means to act with integrity.
- Ensure that your team understands its responsibilities under the Code and provides guidance.
- Create an environment where your team is comfortable coming to you with concerns.
- Never value or encourage business results over ethical conduct or compliance with the Code.
- Speak up if you see or suspect any violation of the Code.
- Consider conduct in relation to the Code and Company policies when evaluating performance.
- Ensure timely completion of mandatory training.
- Take ownership of compliance obligations.
- Oversee vendor compliance with the Vendor Code of Business Conduct and Ethics.
- Identify, prioritize and manage risks.



We Speak Up When We See Something Wrong

It can take courage to speak up when you see something wrong. However, in order to serve our members with excellence and dedication, you must always speak up when you know about a violation (even if it is only a suspicion) of the Code, Company policy or any legal requirement. Speaking up allows us to investigate your concern and take appropriate disciplinary action against whoever has violated the Code, Company policy or any legal requirement. This includes immediately speaking up about any fraud, waste or abusive practices or criminal conduct committed by any of our providers, vendors, members or other third parties. Reporting violations reinforces an ethical atmosphere and can positively influence the actions of your coworkers. If you don't speak up, there may be severe consequences for the Company, our members and our community.

Horizon also promises to keep reports of violations confidential, to the extent possible. Information about investigations is only shared on a need-to-know basis. Results of investigations may be shared with law enforcement or regulatory authorities in certain instances.

You are expected to cooperate in any investigation. If you fail to cooperate, intentionally give false, misleading or inaccurate information or withhold information, you are subject to disciplinary action, up to and including termination. Disciplinary action, up to and including termination, will be taken against anyone who violates the spirit or letter of any part of the Code, laws, regulations or Company policies.

In addition, Horizon strictly forbids any type of retaliation for:

- Reporting violations
- Cooperating with an investigation
- Giving information to an investigation
- Conducting self-evaluations, audits or remedial actions

What is Retaliation?

Retaliation occurs after you have engaged in activity protected by law, such as filing a complaint or reporting a violation of law or Company policy. It can involve unjustified termination or demotion, and may also include actions like an unjustified negative evaluation. Horizon **strictly forbids retaliation** and does not tolerate those who retaliate.

Retaliation does not include any discipline taken due to unrelated performance issues, discipline for making a false report or discipline for failing to fully cooperate in an investigation.



Your Role in Speaking Up

- Speak up when you see or know of a violation of the Code, a policy or a legal requirement.
- Cooperate in any investigation.
- Contact someone when you have an ethical question (your supervisor or the Compliance and Ethics Office).
- Use the Compliance Integrity Helpline to make anonymous reports at **1-800-658-6781**.
- Never retaliate against anyone who speaks up and reports a violation in good faith.
- Never give intentionally false or misleading information during an investigation.
- Immediately report any suspected fraud, abusive practice or dishonest action to the Compliance and Ethics Office, Special Investigations or the Compliance Integrity Help Line.

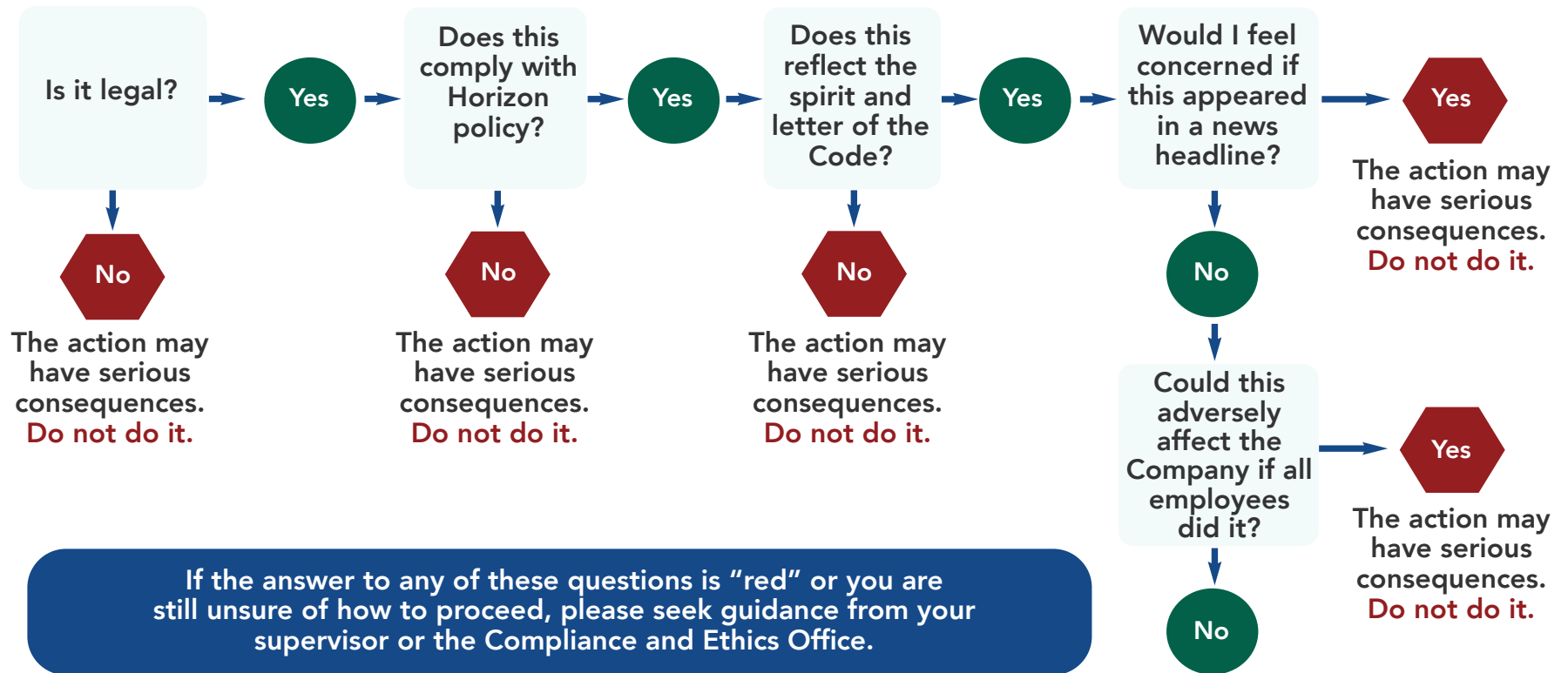


The Key Contacts section on page 37 describes how you can report fraud, waste, abuse, dishonest actions or criminal conduct, including those that involve Medicare Advantage and Part D fraud, waste or abuse.

Assistance is Available

You won't find the answer to every question in the Code, but you will find the guidance you need to help you use good judgment in your decision-making. You can always reach out to your supervisor or the Compliance and Ethics Office for guidance ([see the Key Contacts section on page 37](#)). Before making a decision, you can always ask yourself the questions below:

Resolving Compliance and Ethics Dilemmas



Q&A

When should I call the Compliance Integrity Help Line?

Call the Compliance Integrity Helpline any time you require guidance about a compliance issue or when you wish to speak up about a potential violation of the Code, Company policies, or any legal requirement. The Help Line is not meant to replace reporting to a specific department, but is available to you if you are not comfortable reporting your concern in person, or if you wish to remain anonymous. The Help Line is available to you 24 hours a day, seven days a week.

What happens when I call the Help Line?

The vendor transcribes the information you provide and transmits it to the Compliance and Ethics Office. The Compliance and Ethics Office, Special Investigations or Human Resources will investigate the issue.

Can I make a report anonymously?

You have the choice of identifying yourself or staying anonymous when calling the Help Line. The vendor will not record or trace your call. When making an anonymous call, you must provide enough information about the situation to allow the Company to investigate.



Related Policies: Interested Party Complaint Procedures for Accounting, Auditing and Other Compliance Matters, Non-Retaliation, Anti-Fraud, Voluntary Self-Disclosure, Identifying and Responding to Compliance Violations or Suspected Violations.



We Avoid Conflicts of Interest

We must always make sure we act fairly, objectively and impartially when serving our members. To do that, we must avoid all conflicts of interest or appearances of conflicts of interest. Conflicts of interest are personal or professional connections that interfere with your ability to perform your job fairly, objectively and impartially. You are required to disclose all potential conflicts of interest immediately and promptly take action to eliminate a conflict of interest when asked to do so. In some cases, reporting the conflict will be enough. In other cases, you may be asked to recuse yourself from any decision relating to the conflict.

Remember, conflicts of interest also apply to your immediate family members. If you have a family member who holds a personal or professional interest that may improperly influence your work, you are required to disclose that relationship.



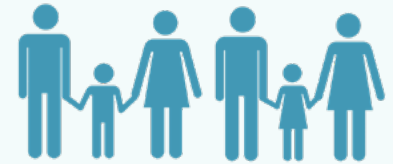
Your Role in Avoiding Conflicts of Interest

- Always act in the best interest of the Company.
- Advise the Compliance and Ethics Office immediately of any potential conflicts of interest that arise during the year.
- Disclose any conflicts of interest when hired and annually on your Conflict of Interest Questionnaire.
- Receive approval prior to accepting a position on the board of directors of a company, whether it's a for-profit or a nonprofit.
- Disclose any position you have or your family member has with any health care provider, regardless of the provider's location.
- Seek prior approval from the Compliance and Ethics Office if you wish to participate in any meetings, phone calls, conference calls, panels or other group events where you will discuss health care or the health care industry.
- Disclose significant investments you may have in any providers, vendors, suppliers, customers or other third parties.
- Never take part in any activity that competes with the Company in any way.
- Never accept payments in return for referring members to practitioners or for treatment.
- Never employ relatives or referrals in a supervisory or subordinate relationship.
- Never use your position with the Company for your personal benefit.

If you knowingly fail to (1) report a conflict of interest, (2) complete the annual Conflict of Interest Questionnaire timely or (3) comply with the actions required to resolve a conflict of interest, you will be subject to disciplinary action up to, and including, termination.

Immediate Family Members

For purposes of this Code, “immediate family members” includes your spouse, parents, children, siblings, mothers-and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law, and anyone (other than domestic employees) who shares your home.



Conflicts of Interest Can Look Like ...

Jennifer is offered a part-time job at a company that competes with us in some markets. The project she will be working on is in a market in which we do not compete. Is this a conflict of interest?

YES. Even though the project she will be working on is not directly competing with the Company, it is still a conflict of interest and violates the Code because employees are not allowed to take part in any venture that competes with the Company in any way.

John’s spouse is employed by a customer of the Company. Is this a conflict of interest?

NO. However, John should disclose the relationship to the Compliance and Ethics Office and on his Conflict of Interest Questionnaire. Disclosing the relationship can prevent any misunderstanding. John and his spouse should also be careful not to discuss confidential business issues.



For more information, please refer to these policies: Conflicts of Interest, Employment of Relatives and Friends.

We Give and Accept Appropriate Business Courtesies

It is sometimes customary to exchange business courtesies such as gifts, meals, drinks, entertainment and recreation with third parties.

A business courtesy should never be offered or accepted if it might create a sense of obligation, compromise your professional judgment or create the appearance that it might compromise your professional judgment. Gifts of cash or cash equivalents (such as gift certificates, securities or below-market loans) in any amount are always prohibited. It's never acceptable to solicit a business courtesy. If you are in doubt about whether a business courtesy is appropriate, contact the Compliance and Ethics Office for guidance.

Except for commissions paid to brokers and agents or as otherwise allowed by law, no payment can be made, directly or indirectly, to obtain or keep business or obtain any other favorable action.



Your Role in Giving or Accepting Appropriate Business Courtesies

- Never give or accept any item that could be construed as a bribe or a kickback.
- Never accept cash or its equivalent.
- Never accept gifts or entertainment that are excessive in value.
- Never pressure a customer, supplier or vendor to purchase our products as a condition of doing business with that company.
- Never allow other companies to dictate our purchases of services from them simply because they are our customers.
- Never accept discounts that are not available to the general public or recognized as part of the Company's discount program.
- Never pressure colleagues to give a gift, or contribute to a collective gift, for another colleague.
- Never accept an honorarium or a speaker fee for speaking on behalf of the Company.



Business Courtesies

Business courtesies are any benefit for which an employee does not pay fair market value, such as: entertainment, meals, beverages, hospitality, transportation, discounts, tickets or passes.

Gifts and Entertainment

I am participating in a conference and a vendor has offered me two tickets to a basketball game. He indicated that he can't use them. Can I accept the tickets?

It depends. Remember that all gifts and entertainment provided by and to outside parties are subject to the policy on Gifts and Entertainment. In addition, you need to be aware of the difference between gifts and entertainment under that policy. Specific rules apply to gifts and entertainment.

For example, acceptable entertainment may include tickets to a theater or sporting event if the purpose is business-related and the expense is reasonable and customary and not excessive in frequency. However, any type of entertainment where a representative of the company offering the entertainment **will not be accompanying the employee** is considered a gift, and is subject to the monetary gift limits described in the policy.



For more information, please refer to these policies: [Gift Giving Among Employees](#), [Gifts and Entertainment](#), [Honorariums](#).



We Treat Others with Respect and Act with Integrity in the Workplace

Our success is driven by the diversity and talent of our employees. We embrace and value the things that make us unique individuals and foster a culture of Diversity, Equity, and Inclusion. We embrace and value differences of culture, education, experience, physical ability and perspective in our workplace. We are committed to providing a safe and healthy workplace in which individuals are treated with courtesy and fairness, and respect the dignity of others. We do not tolerate any form of discrimination or harassment, including sexual harassment, in the workplace.



Your Role in Treating Others with Respect and Acting with Integrity

- Contribute to a supportive work environment that values different perspectives and ensures that everyone's voice is heard.
- Speak up if you see someone being treated unfairly.
- When hiring anyone or making any employment-related decisions, make sure your evaluation is based on ability, skills, knowledge, work experience and job performance.
- Work with the Human Resources and Legal departments to understand what labor and employment laws require in the areas where you do business.
- Exercise care in the accuracy, tone and style of your written communications, including email and instant messaging. Written communications can be retrieved even after they have been deleted, and can be taken out of context.

Our employees, members and communities benefit when we show respect, consideration and inclusion of different perspectives in our work every day. The same applies to our interactions with external business partners. Each of us should contribute to a work environment that is free from harassment and intimidation. Disrespectful behavior will not be tolerated.

We Maintain a Safe Working Environment

We provide a safe, healthy, secure and drug-free work environment for everyone. You are prohibited from possessing, selling or being under the influence of any illegal substance while on Company property or while conducting Company business. You are also prohibited from making threats, committing acts of violence or intimidation, and possessing or selling firearms or weapons on Company property or when conducting Company business.



Your Role in Maintaining a Safe Working Environment

- Know and abide by Company policies regarding drugs and alcohol.
- Report any unsafe conditions, violent acts or threats.





Your Role in Preventing Harassment

- Never take actions that are intended to intimidate or harm someone.
- Avoid actions that could be considered harassment – even if meant as a joke.
- If you witness behavior that you believe is harassment, report it.
- You can report discrimination or harassment to a Human Resources representative, your supervisor or any Horizon manager.

Prohibited Harassment and Discrimination

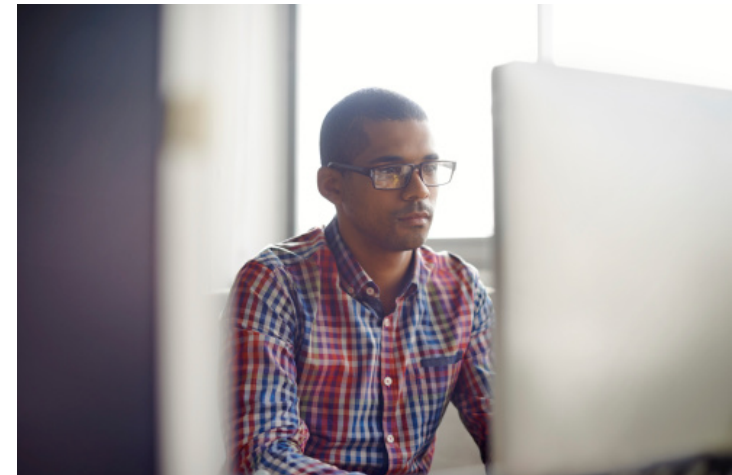
Horizon prohibits harassment and discrimination against anyone for reasons which include, but are not limited to:

- Age
- Race
- Creed
- Religion
- Color
- Gender
- Pregnancy
- National origin
- Marital status
- Sexual orientation
- Gender identity
- Veteran status; service in armed forces
- Any other status or condition protected under any law or regulation
- Real or perceived disability



Your Role: Supervisors and Managers

You must always report alleged harassing, discriminatory or retaliatory conduct that is reported to you or observed by you. The report must be made to your supervisor and a Human Resources representative.



Q&A

What is harassment?

Typically, harassment is behavior that the recipient finds insulting, demeaning, hurtful, threatening or exclusionary. Harassment takes many forms and can include words, gestures or acts.

Be aware that behavior that is “acceptable” in your view may not be considered “acceptable” by everyone else.

Some examples of harassment include:

- Derogatory comments, greetings, nicknames, slurs or gestures
- Threats, intimidation and verbal or physical assault
- Overtly or implicitly offensive media or communications



Policy References: Affirmative Action, Discrimination and Workplace Harassment, Reasonable Accommodation, Substance Abuse and Drug Free Workplace, Workplace Violence Prevention.

We Safeguard Private Information

Our business is based on the foundation of providing peace of mind to those we serve. Our members place their trust in us to always protect their Private Information. We can provide them with peace of mind by always safeguarding Private Information, properly protecting our assets and maintaining accurate business records.

We are committed to protecting the confidential, proprietary and private information that our members, employees and clients share with us. Various state and federal laws and regulations, including the Health Insurance Portability and Accountability Act (HIPAA), govern the Company's use and disclosure of our members' Private Information. You are not allowed to access, use or disclose Private Information unless you have a legitimate business need to do so and are performing an appropriate business function for the Company. This means that you should not discuss sensitive business matters with anyone who does not have a legitimate business need to know the information. You are not permitted to use personal assets (including email and text messages) to communicate Private Information.

What is Private Information?

Private Information includes both financial and health information about our members as well as Protected Health Information (PHI). PHI is individually identifiable information concerning the provision of, or payment for, health care to the Company's members. Private Information includes but is not limited to:

- PHI – medical and personal records
- Electronic Protected Health Information (ePHI) – electronic medical and personal records
- Personally Identifiable Information (PII) – Social Security Numbers, addresses and credit card and bank account numbers
- Horizon Proprietary Data – payroll, budgets, strategies, project portfolios and employee information



Your Role in Safeguarding Private Information

- Secure all electronic and paper files against unauthorized use and disclosure.
- Keep all Company information confidential until it becomes public or disclosure is authorized by the Legal department, even after you leave the Company.
- If you leave Horizon, return all Private Information.
- You are not permitted to access your own, or family members' or friends' information on Horizon systems.
- When discussing confidential information, remember that you can be overheard in public places like restaurants, elevators and trains, and when using cell phones.
- When emailing Private Information, be careful that you are sending it to the correct recipients.
- Use the Secure Blue button when sending Private Information outside the Company.
- Ensure that the proper agreements are in place prior to sharing Private Information with a third party.
- Never take a picture in the workplace, unless you have secured the specific approval of the Chief Security Officer.
- Never share your passwords or use anyone else's passwords.
- Never use or disclose more than the Minimum Necessary information in violation of HIPAA.

Making the Right Decision



My coworker wanted to find out if her ex-husband's new wife is pregnant and looked up her information in the claim administration system in order to find out. I think this may have been a breach of member privacy. What should I do?

You are correct that your coworker acted improperly, since she has no legitimate reason to access the information as part of her job with the Company. Even if she were assigned to process a claim for her ex-husband's new wife, she would only be permitted to access that information to perform her job and not for any other purpose. You should report this incident to the Privacy Center of Excellence.

I'm out of the office and I left a file on my computer desktop. My coworker needs the file to complete an urgent report for an officer of the Company. My coworker asked for my password to access the file. What should I do?

You should decline and not give her your password. Remind her that sharing passwords is strictly prohibited and may result in both of you being subject to disciplinary action, up to and including termination. Only the Chief Security Officer can allow an exception.

Also, remember to save documents to drives on our servers, not to your desktop.

We Protect Company Assets

We all have a critical and ongoing role to play in asset management. Each of us is responsible for protecting Company assets from theft, waste and misuse. Company assets should be used only for the benefit of the Company and for valid business purposes. Failure to safeguard Company assets and misuse of Company assets may result in disciplinary action, up to and including termination. If you misuse Company assets, you may have your access to those assets denied or restricted, and you may be subject to disciplinary action.



Your Role in Protecting Company Assets

- Limit your personal use of the Company's phones, voicemail, fax machines, copy machines, smartphones, printers, computers, laptops, tablets, internet access and computer networks.
- Never use Company resources, including time, property or assets, for personal or financial gain unrelated to the Company's business or your role at the Company.
- Immediately report any loss, misuse, damage or suspected theft of Company assets to the IT Service Desk and your supervisor.
- Always log off the network and lock your laptop when you leave your desk.
- Never leave your laptop, smartphone and other devices unattended.
- Follow the best practice of locking your laptop in your drawer when you leave for the evening.
- While in the office, wear your ID badge at all times.
- Never give your ID badge to someone else, or swipe your ID badge for someone else.
- Follow the requirements in the Information Assets and Acceptable Use Policy.
- Never misuse Company assets for improper purposes. Improper purposes include communicating in an obscene, hateful, defamatory or otherwise objectionable manner, such as:
 - Creating, viewing or sending sexually explicit material
 - Communicating information that you know, or should know, is false
 - Harassment of any type
 - Personal gain
 - Gambling or illegal activities
- Creating or sending electronic chain letters
- Downloading or sending non-business related audio/visual material
- Downloading or sending commercial software or copy righted material in violation of its copyright
- Automatically forwarding all voicemail or email messages to another account
- Sending work-related information or materials to a personal email account
- Violation of this rule could lead to the Company accessing an employee's personal email account in order to gather information subject to Legal Holds.
- Never conduct Horizon business on your personal email account.
- Never transmit Private Information via text message.



Your Role: Supervisors and Managers

- Ensure that the workforce you manage understands the importance of asset management efforts.
- Properly verify assets.
- Ensure contractors, consultants and other non-employee workforce members understand their responsibilities for protecting their Horizon-issued assets.

Privacy and Company Assets

You should have no expectation of privacy regarding communications produced with the use of Company assets.

The Company may review and disclose, without your knowledge or permission, any communication or other material produced with the use of Company assets for any legitimate business purpose. This includes email, instant messaging, text messages, voicemail and other electronic communications systems.

Q&A

What are some examples of Company assets?

- All physical property like workspace, supplies and equipment (including copy and fax machines)
- Information systems such as email, text messages, voicemail, digital storage, intranet and internet access and software applications
- Work time
- Information about the Company, its business and its clients
- Intellectual property
- Company funds, including cash, checks and Company credit cards

A Word About Proprietary Information

Proprietary information is considered Private Information because it is not typically available to the public and could cause harm to the Company if disclosed. Therefore, we must protect our proprietary information, including trade secrets. However, with respect to our Company's trade secrets, you will never be held criminally or civilly liable under any federal or state trade secret law for disclosing a trade secret when you make that disclosure in confidence to a government official or to an attorney for reporting or investigating a violation of the law.

You will also never be held liable for disclosing a trade secret if you disclose it when filing a complaint or other document in a lawsuit, if the lawsuit is under seal.

If you ever file a lawsuit for retaliation against Horizon for reporting a suspected violation of law, you can disclose that trade secret to your attorney if the lawsuit is filed under seal and you do not disclose that trade secret, except following a court order.



Making the Right Decision

I took my laptop home, but I don't need it. Can I leave the laptop in a car trunk overnight or over the weekend?

This is not permitted in any circumstance. Bring your laptop inside your home and consider locking it in a cabinet when not in use. If that is not possible, the laptop should be placed somewhere out of sight when not in use.

I need to go to the store. Can I leave my laptop on the seat of a locked car while I run a short errand?

No, leaving your laptop on the seat of a locked car while running a short errand is not permitted. You must lock your laptop in the trunk, glove compartment or center console **before** you leave to run your errand. Do not wait until you get to your destination to place your laptop in the trunk. Plenty of thefts occur because thieves wait and watch for exactly this behavior.

My supervisor is expecting me to finish a presentation for the VP of our division by first thing tomorrow morning. It is already after 6 p.m. and I need to pick up my child from daycare. Is it okay if I send the presentation to myself at home so I can work on it and finish it by the morning?

No, this is not an acceptable way to conduct Company business. PHI, presentations, spreadsheets, project materials and other proprietary and protected information should never be sent to a personal email address. Speak to your supervisor about other options that may be available to you in these types of situations.

A political candidate that I support is holding a fundraiser, and I want to encourage my coworkers to attend. May I use a Company copy machine to make copies of a flyer to hand out?

No, this is an inappropriate use of Company assets because assets should be used only for the benefit of the Company and for valid business purposes. In addition, use of Company assets or facilities for any political activity is prohibited. (See the We Uphold all Laws and Regulations section on page 32.)

Our sitter is out sick and my husband is supposed to pick up our son from soccer practice this afternoon. May I send him an email reminder from work?

With your supervisor's approval, this is okay. But remember that anything you send or receive through Company email can be retrieved later, even after it has been deleted. So be careful with communications that could be embarrassing to the Company, or to you, if reviewed later.

My son's school is selling candy. May I bring it into the office to sell to my coworkers?

With your supervisor's approval, you may leave a brochure, or the candy, in a generally accessible location, and if someone wishes to make a purchase, they can do so during non-work hours. However, you may not solicit employees or approach other employees at their desks or via email.



Reporting Violations

Privacy Violations

Immediately report privacy violations to your supervisor and the Privacy Center of Excellence at **1-973-466-7669**.

Data System Security Violations

Immediately report data system security violations to your supervisor and to the IT Service Desk at **1-732-256-5200**. You may also contact the Chief Information and Security Officer at **1-973-466-7753**.



Policy References: Information and Cyber Security Office Policies: IT Asset Acquisition and Management, Electronic Media Controls, Information Assets and Acceptable Use.



We Maintain Accurate Books, Records and Communications

Our members, providers, auditors, regulators and other third parties rely on us to maintain accurate books and records. Without accurate books and records, we will not be able to conduct our business in a sound and efficient way and will not be able to provide peace of mind to those who depend on us.



Your Role in Ensuring We Maintain Accurate Books and Records

- Follow all legal requirements, Company policies and the Code when accessing, creating and managing records.
- Never create or submit false or misleading reports, records or entries, including in Workday Time and Absence.
- Never omit, conceal, alter or destroy relevant information.



Your Role: Supervisors and Managers

Build and maintain a system of internal controls that:

- Prevents unauthorized, unrecorded or inaccurately recorded transactions.
- Detects unauthorized, unrecorded or inaccurately recorded transactions.
- Results in preparation of financial statements based on generally accepted accounting principles.





Making the Right Decision

If there is missing data or information on a provider's bill that I am going to submit for claim payment, may I add it in?

No, you should not alter any business records or reports. This includes documents, claim forms and coding. The provider in question must supply all required information before the bill can be processed for payment.

My manager has requested that I alter our quarterly report so that the numbers look better. Should I listen to my manager and make the proposed changes?

No, you should not. Even though the request came from your manager, you should never create false or misleading reports and your manager should not ask that of you. Instead, contact the Compliance and Ethics Office.

We Properly Retain All Records

We properly maintain all records, whether paper, electronic or in any other media, and destroy those records properly and in accordance with all legal requirements and the Records Retention Policy. Company records include those business records, such as emails and text messages made on your personal device. Horizon business must be conducted on the Company's email and no Company business is to be sent to or from a personal email account. However, if records, including emails or text messages, are on an employee's personal device, they are subject to the Records Retention Policy and must be retained until the retention expiration date.



Your Role in Retaining Records

- Comply with Legal Holds when litigation or a government investigation, examination or audit is threatened or pending.
- Follow the retention requirements set out in the Records Management Policy.
- Properly dispose of all Private Information in the locked shredding bins.

If you are uncertain about the proper retention period for any document, or possible restrictions on destroying a document or record, contact your supervisor, your division's Records Management Coordinator, the Compliance and Ethics Office or Legal Affairs.

How to Handle a Legal Hold

Legal Holds supersede the Records Retention Schedule. If Legal Affairs issues a Legal Hold, any relevant records must not be destroyed until the Legal Hold is lifted. Destroying or altering records prior to that time could result in a criminal offense and may have a negative effect on the Company in pending litigation or a governmental investigation. The Company reserves the right to demand access to personal email accounts or text messages on personal devices, if there is reason to believe that personal accounts have been used to conduct Company business.

Q&A

What is a record?

A record is a document that must be preserved for a specific period of time, pursuant to the Records Retention Schedule, law or governmental authority, or by Court Order. A record may also be a document that contains information of sufficient value to the Company's business operations to warrant preservation. Records are retained in all types of media, whether in hard copy or electronic format. Records are managed by Horizon Information, Document and Records Management Policy.

Some examples of records (this list is not all-inclusive):

- Contracts entered into by Horizon
- Claims files
- Benefit and Enrollment files
- Horizon's governing documents
- Filings by Horizon with a regulatory agency
- Human Resources documents, including timesheets and performance reviews
- Financial information, including tax returns and bank statements



Policy References: Records Management, Legal Holds.



Your Role in Communications

- Never speak on Horizon behalf unless you are authorized to do so.
- Seek approval from Enterprise Communications to develop external communications or marketing materials.
- Never disagree with any official position taken by the Company when speaking on the Company's behalf.
- Forward all media inquiries to the Public Affairs department, unless you have permission to respond.
- Coordinate with Legal Affairs or the Compliance and Ethics Office when making any communications related to a pending legal matter or regulatory issue.
- Never distribute an email to all employees without prior approval from Enterprise Communications.

Media Inquiries and Speaking on Behalf of the Company

Each of us is responsible for maintaining the Company's reputation. An important part of building trust with those we serve is ensuring that all of our communications are timely, consistent and accurate.

Only those authorized by the Company to do so can speak with the press as a Horizon representative or about Horizon business. Otherwise, they must receive prior approval from senior management.

Q&A

What about when I am speaking in a personal capacity, such as at a dinner party?

In your personal capacity, including conversations, social media interactions, blogs or email, you should not discuss Company business or proprietary or confidential information, or give the impression you are speaking on behalf of the Company.

What is an example of an Acceptable Social Media/Personal Communications Disclaimer?

"All posts and communications of any kind, made by me, are my personal opinions and do not represent the opinions or positions of my employer."

Am I allowed to identify myself as an employee of Horizon on social media?

If you list the Company as your employer on social media sites such as Facebook, Twitter and LinkedIn, you must include a disclaimer that states all posts are your personal opinions and that you do not speak for the Company.



Policy Reference: Social Media.

Attorney-Client Privilege

The attorney-client privilege protects confidential communications between an attorney and a client. It applies to documents and communications created in the course of requesting or providing legal advice. However, it does not apply to all communications you may have with an attorney. You should not forward or otherwise distribute privileged communications without prior permission from the attorney. Questions on the use and applicability of the privilege to your communications should be directed to Legal Affairs.



Making the Right Decision

I received an email from a reporter with several questions about a newly appointed Officer of the Company. May I respond to the reporter?

No, you may not answer questions from the media without prior approval to do so. Refer the reporter's questions to the Public Affairs department.

I am on a social networking site and want to respond to a comment about health insurance companies. Am I allowed to post a reply?

The best practice is not to respond. This is especially true if you are responding to a post on a site like LinkedIn or Facebook where you identify Horizon as your employer. However, if you respond, you must specifically state that you are responding in a personal capacity and not as a representative of the Company. You should not mention Horizon or your position with the Company in your reply and you must have a disclaimer on your social media site (see page 30).

We Uphold all Laws and Regulations

We are committed to enriching the lives and health of our members and the communities we serve. Our communities include not only the places where we live and work, but the broader health care community overall as well.



Your Role in Upholding all Laws and Regulations

- Respect the intellectual property rights of the Company and others.
- Compete fairly in the marketplace by always acting ethically, never misrepresenting material facts or concealing information.
- Adhere to all antitrust laws, including never agreeing to fix prices or participate in a boycott.
- Only participate in the political process in your individual capacity and never as a representative of the Company.
- Never use Company assets, including time, for any type of political activity.
- Never use Company funds for political donations, unless approved in advance by senior management.
- Ensure that your political activity (including contributions) is in accordance with all state and local pay-to-play laws.



Your Role: Officers and Board Members

Officers, their spouses, civil union partners and children must consult with Legal Affairs in connection with individual political contributions to any New Jersey state or local government.

Officers must report to Legal Affairs, on a quarterly basis, all such contributions to state, county and municipal candidates and agencies, including, but not limited to, school boards, fire districts, elected sheriffs, surrogates and political action committees.

Board members may be asked to provide such information on an as-needed basis.



Antitrust Guidelines

Any meetings or conference calls with a representative of a competing health plan, health maintenance organization or insurer should meet one or more of the following criteria:

- It is preceded by a published agenda, and meeting minutes are created for subsequent publication.
- It is an educational seminar sponsored by a well-established industry organization (e.g., National Committee for Quality Assurance [NCQA], America's Health Insurance Plans [AHIP], New Jersey Association of Health Plans [NJAHIP], Blue Cross Blue Shield Association [BCBSA]).
- It is conducted for the sole purpose of achieving or preventing legislative or regulatory action.
- It is approved in advance by Legal Affairs.

For anti-trust issues related to Braven Health, a Horizon affiliate, please also consult the Braven Health Antitrust Compliance Policy and Guidelines as well Legal Affairs.



Making the Right Decision

I recently purchased a ticket to attend a rally supporting a candidate in New Jersey. Since the candidate's policy positions are beneficial to the Company, may I submit the expense for reimbursement?

No, not directly or indirectly. The cost of fundraising tickets for political functions is considered a political contribution and, therefore, is not reimbursable in any way by the Company.

Serving in an Elected Office

You may serve in local elected office, provided you have received prior approval from a director in your Division. Directors should consult with the Compliance and Ethics Office prior to giving approval to determine if a conflict of interest exists. You may not serve in a federal or state office.

We Do the Right Thing

You play a vital role in enriching the lives and health of our members by conducting your business with integrity and in accordance with all legal requirements. Abuse and illegal actions cost the health care industry billions of dollars every year and put our members' health and welfare at risk.



Your Role in Doing the Right Thing

- Never, directly or indirectly, accept, make or approve a bribe, kickback, or promise of an improper benefit.
- Never make a facilitation payment (small payment to a government official to expedite the performance of a routine act).
- Never make a payment for an illegal activity.
- Follow all anti-corruption and anti-bribery laws and never bribe or attempt to bribe a government official or government employee.
- Never offer a payment of money, gift, entertainment, services or anything of value to a government official or government employee.
- Never do business with a person or company who is excluded from participation in federal and state health care programs, such as Medicare or Medicaid.
- Comply with all reasonable requests of authorized officials and governmental agencies.
- Cooperate to provide access to records or facilities, as required by law or regulation, when requested by the government or an auditor.
- Interact with a federal or state government agency or employee in a direct, open, respectful and ethical manner.
- Never take any action that could mislead any government representatives.
- Only serve in local elected office after you have obtained the appropriate approval.
- Only advocate on public policy issues in your individual capacity, and not as a representative of the Company.



Q&A

What should I do if a regulatory or law enforcement representative contacts me?

If you are not authorized to respond to the request, you should:

- Obtain the person's name, agency or regulatory body, and the nature of the question.
- Explain that you are required to obtain internal approval before being interviewed or providing any information on behalf of the Company.
- Immediately contact the Compliance and Ethics Office, Legal Affairs or Special Investigations.

What is a Kickback?

A kickback is a payment made to a person in a position of power or influence as part of an illicit agreement or coercion. Kickbacks are often paid in money, but can also take the form of gifts, entertainment or anything of value.

"Anything of value" can take forms beyond currency. It includes credits, free goods or services, forgiveness of a debt, sale or purchase of an item below market value, as well as compensation for unnecessary services or for legitimate services at a rate exceeding fair market value.

Administration and Waivers

Waivers to a portion of this Code will only be given in exceptional circumstances. Any requests for a waiver of any provision of this Code must be made in writing and may only be granted by the Chief Compliance and Risk Officer. Waivers for Executive Officers or Board Members may only be given by the Audit, Compliance and Risk Committee of the Board of Directors, as appropriate. Amendments to this Code must be approved by the Audit, Compliance and Risk Committee of the Board of Directors and the Board of Directors. The Chief Compliance and Risk Officer, in conjunction with the Compliance and Ethics Committee, may make administrative changes to the Code between annual approval periods.



Policy references: Acquisition of Goods and Services, Anti-Kickback, Office of Inspector General and System for Award Management Exclusion.



Key Contacts

Obtain advice and/or an interpretation	• Timothy Susanin, Chief Compliance and Risk Officer at 1-973-466-7100, or the Compliance and Ethics Office at 1-973-466-4544 or email ComplianceandEthicsOffice@HorizonBlue.com
Report harassment or discrimination or workplace safety concern	• Your Supervisor • Human Resources Representative • Compliance and Ethics Office at 1-973-466-4544
Report violations or suspected violations of the Code or Company policies ^{1,2}	• Your Supervisor • Compliance and Ethics Office at 1-973-466-4544 or email ComplianceandEthicsOffice@HorizonBlue.com • Compliance Integrity Help Line at 1-800-658-6781 • Write to Special Investigations or the Compliance and Ethics Office at: Riverfront Plaza, PO Box 200145, Newark, New Jersey 07102
Raise a privacy concern or report a privacy violation	• Privacy Center of Excellence at 1-973-466-7669 • Compliance Integrity Help Line at 1-800-658-6781 • email PrivacyOffice-Legal@horizonblue.com
Raise an information security concern or report an information security violation	• Information and Cyber Security Office email Abuse@HorizonBlue.com • Compliance Integrity Help Line at 1-800-658-6781 • IT Service Desk at 1-732-256-5200
Raise a Medicare Advantage or Part D issue or report a violation of law or policy about Medicare ³	• Medicare Compliance Officer at 1-609-537-2317 • Compliance and Ethics Office at 1-973-466-4544 or email ComplianceandEthicsOffice@HorizonBlue.com
Report Fraud Waste or Abuse, including Medicaid, Medicare Advantage or Part D	• Special Investigations at 1-973-466-8723 • Fraud Hotline at 1-800-624-2048 • Medicaid Fraud Hotline at 1-855-FRAUD20 (1-855-372-8320) • Medicare Part D Fraud, Waste and Abuse Hotline at 1-888-889-2231 • Medicare Advantage Fraud, Waste and Abuse Hotline at 1-800-624-2048
Report a significant business risk	• Enterprise Risk Management at 1-973-466-7850
Make an employee or non-employee interested party complaint regarding accounting, internal accounting controls, auditing matters or complaints or suspected violations of law, regulation or Company policy	• The individuals designated in the "Interested Party Complaint Procedures for Accounting, interested party complaint regarding Auditing and other Compliance Matters" policy
Report a workplace safety concern	• Corporate Security at 1-973-466-8429 • Human Resources Representative
Report the loss, misuse or suspected theft of Company assets	• IT Service Desk at 1-732-256-5200

¹ Board members should report any concerns or questions about violations or suspected violations to the Chief Compliance and Risk Officer. Officers (except the Chief Compliance and Risk Officer) should report any violation or suspected violation to the Chief Compliance and Risk Officer. The Chief Compliance and Risk Officer should report any violation or suspected violation to the Chairman and CEO.

² If you believe, using your reasonable judgment, that a violation or suspected violation should be brought to the immediate attention of senior management or the Board of Directors, contact the Chairman, President and CEO, in writing, at 3 Penn Plaza East, Newark, NJ, 07105, or the Chairman, Audit, Compliance and Risk Committee of the Board of Directors, at 3 Penn Plaza East, Newark, NJ 07105, Attn: Corporate Secretary.

³ Concerns may also be reported to the Centers for Medicare & Medicaid Services (CMS), the MEDICs or other CMS designee.

Key Regulatory Requirements

You are required to follow the spirit and the letter of the laws and regulations to which we are subject, both as individuals and as a Company. While the listing below is not inclusive of all such laws and regulations, it provides an overview of some important requirements that apply to our business.

Fraud, Waste and Abuse

The Federal False Claims Act (FCA) prohibits knowingly submitting a false or fraudulent claim (to Medicare, Medicaid or other federal health care program) for payment. The FCA also allows whistleblower lawsuits, and provides protection of whistleblowers against any retaliation by their employers for reporting potential fraud or abuse.

The Anti-Kickback Statute prohibits knowingly and willfully offering or making, requesting or receiving anything of value (including bribes, kickbacks and rebates) from a vendor, supplier, provider, member or beneficiary in return for payment or reimbursement under a government program.

The Stark Law (Physician Self-Referral Law) prohibits a physician from making certain referrals to a particular entity if he/she has an ownership/ investment interest or a compensation arrangement with that entity.

The New Jersey Insurance Fraud Prevention Act requires the development of fraud prevention programs and the repayment of fraudulently obtained insurance benefits, thereby reducing the amount of premium dollars used to pay fraudulent claims.

Medicaid Contract Provisions require referral of proven cases of fraud to the New Jersey Office of State Comptroller's Medicaid Fraud Division for screening, for advice and/or for assistance on follow-up actions to be taken.

Medicare Regulations and Guidelines from the Centers for Medicare & Medicaid Services govern Medicare Advantage Organizations and Medicare Prescription Drug plans and, in part, require the implementation of an effective compliance program to prevent, detect and correct fraud, waste and abuse and Medicare Program noncompliance.

Privacy and Security

The Health Insurance Portability and Accountability Act (HIPAA) requires Horizon, and its workforce, to protect the confidentiality, integrity and availability of health care information, in all forms, and provides safeguards to prevent unauthorized access to protected health care information.

The Health Information Technology for Economic and Clinical Health Act expands the scope of privacy and security protections under HIPAA, increases the potential legal liability for noncompliance and provides for more enforcement of the HIPAA rules.

The Patient Protection and Affordable Care Act requires transparency along with the expansion of Medicaid eligibility requirements.

New Jersey Encryption Law requires health insurance carriers to encrypt electronically gathered and stored personal information.

Employment Laws

Title VII of the Civil Rights Act of 1964 prohibits discrimination against race, ethnicity, national origin, religion and gender.

The Age Discrimination in Employment Act prohibits discrimination based on age.

The Americans with Disabilities Act prohibits discrimination on the basis of disability.

The Defend Trade Secrets Act, in certain circumstances, provides protections to those who may need to disclose trade secrets.

Call the Compliance Integrity Helpline at
1-800-658-6781 if you know, or
reasonably suspect, a compliance or
ethics violation of the Code of
Business Conduct and Ethics.

