

Dear Valued Vendor,

Horizon Mutual Holdings, Inc., including its subsidiaries and affiliates (collectively, “Horizon”), operates under high standards of conduct and we comply with all applicable laws, rules, regulations, and sub-regulatory guidance. This includes always taking the proper steps to safeguard our members’ information. We expect the same level of conduct from all individuals, companies, or others, working for, or on behalf of, Horizon, directly or indirectly.

Horizon’s Vendor Code of Business Conduct and Ethics (“Vendor Code”) contains the general principles with which vendors must follow when doing business with us. The Vendor Code describes who is considered a “Vendor” and includes descriptions of some of the laws with which vendors must comply.

As described in the Vendor Code, Vendors are responsible for ensuring that their workforce members comply with the standards contained therein and with any additional restrictive requirements set forth in the Business Agreement with Horizon.

Please take the time to become familiar with the principles of the Vendor Code. Compliance is an important job and we want to be sure that you understand what is required of you.

Horizon offers a number of resources to help answers your Compliance questions and to raise concerns about a violation of the Vendor Code, Horizon policy, or any law, regulation, or standard. Should you have any questions, please refer them to your Horizon business contact or to one of the contacts listed on page six and at www.horizonblue.com/about-us/our-company/supplier-resources/compliance-assistance-and-reporting.

We look forward to working with you and thank you for your ongoing commitment to compliance, ethics, and excellence that Horizon is known for.



Gary St. Hilaire
President and CEO
Horizon Mutual Holdings, Inc.



Cassandra Santos
Chairperson,
Audit, Compliance and Risk Committee
Board of Directors
Horizon Mutual Holdings, Inc.



Timothy S. Susanin
Senior Vice President,
Audit, Compliance and Risk
Horizon Mutual Holdings, Inc.

Horizon has a reputation for doing business with a commitment to honesty, ethics, excellence, and in compliance with all applicable laws, regulations and sub-regulatory guidance. Operating under consistently high standards of conduct is critical to Horizon's success and all Vendors¹ are expected to conduct themselves accordingly. Vendors are responsible for ensuring that their employees, agents, contractors, consultants, temporary workers, volunteers and employees of subcontractors ("Workforce Members") comply with the standards of conduct as described in this Vendor Code. Horizon will request information, as necessary, from the Vendor to ensure such compliance.

Compliance with the Law - Horizon is committed to complying with all applicable laws, regulations and standards, including laws applicable to individuals and entities receiving federal funds. Vendors are expected to conduct their business in the same manner while providing services for Horizon. Appropriate steps must be taken to effectively communicate regulatory requirements to Workforce Members. Certain Vendors are required to complete compliance training as required by their contract, or applicable law or regulation, particularly with respect to protecting our members' information.

Compliance with Horizon Policies and Procedures - Horizon is committed to complying with all applicable policies and procedures established by Horizon. Vendors are expected to conduct their business in the same manner while providing services for Horizon. Appropriate steps must be taken to effectively communicate Horizon policies and procedures to Workforce Members.

Reporting Potential Misconduct - If a Vendor knows of, or reasonably suspects, a violation of this Vendor Code, a Horizon policy, or any law, regulation or standard, in connection with work performed for Horizon, the Vendor must report it to the Vendor's Horizon business contact, the Horizon Compliance and Ethics Office or the Compliance Integrity Help Line. The Compliance Integrity Help Line is provided by Horizon for Vendors to report violations or suspected violations of this Vendor Code, or laws, regulations and standards without fear of retaliation. Reporting can be made anonymously at **1-800-658-6781**. Failure to promptly report a known violation may result in action up to, and including, termination of the business relationship.

Fraud, Waste, Abuse, Dishonesty and Criminal Conduct – Horizon will investigate all allegations of Fraud, Waste and Abuse ("FWA"). All suspected fraud, waste, abusive practices or dishonest actions, including those that involve Medicaid or Medicare Advantage and Part D fraud, waste or abuse, must be reported to the Horizon Compliance and Ethics Office, the Horizon Special Investigations Unit, the Compliance Integrity Help Line, the Horizon Medicare Advantage Hotline, the Horizon Medicare Part D Hotline, the Medicaid Fraud Hotline or the Horizon Fraud Hotline. Contact information is provided on page six and at www.horizonblue.com/about-us/our-company/supplier-resources/compliance-assistance-and-reporting.

Non-retaliation - Horizon does not permit retaliation against any Vendor who, in good faith, reports a violation, or potential compliance violation. This is also true if the Vendor provides information to, or cooperates with, law enforcement or other regulatory agency in the context of an investigation. However, Horizon may take action against a Vendor as a result of the Vendor's involvement in a non-compliant activity.

Avoiding Conflicts of Interest - Vendors must avoid any conflict of interest with Horizon and its employees. In order to avoid a conflict of interest by a Horizon employee, a Vendor may not deal with any Horizon employee who has an investment in the Vendor.

If a Vendor's employee has any type of personal or professional relationship with a Horizon employee or Horizon Board Member, or if a Vendor has any business relationship with Horizon, a Horizon employee or a Horizon Board Member, that might represent a conflict of interest, the Vendor must disclose that relationship to Horizon. Such disclosure should be made to the Vendor's Horizon business contact.

Gifts and Courtesies – The following gifts may not be given or accepted:

- Any gift inconsistent with customary business practices
- Any gift that is excessive in value

- Any gift that can harm the reputation of Horizon if publicly disclosed
- Anything offered to or accepted from a government employee
- Gifts of cash or cash equivalents, such as gift cards or gift certificates
- A non-monetary gift that exceeds \$100, or a gift that, when combined with any other gifts provided to employees and their immediate family, exceeds a value of \$100 in a twelve month period

Other restrictions may apply to any gifts, entertainment or anything of value from a Vendor who is a seller of pharmaceutical products, medical supplies or related products. Those Vendors must contact the Horizon Compliance and Ethics Office prior to offering any business courtesies to a Horizon employee.

No bribes, kickbacks or other similar payments, in any form, shall be made to anyone for the purpose of obtaining or retaining business or any other favorable action. No gifts or entertainment may be given as an inducement to generate any business, including that involving a federal health care program.

Horizon's purchasing decisions are made based on a Vendor's ability to meet Horizon's needs and not on the basis of personal relationships or friendships. Gifts, meals, favors or entertainment that would likely result in an expectation of a personal obligation, should not be extended nor accepted.

Horizon will never pressure any Vendor to purchase its products or services as a condition of doing business with Horizon. Likewise, Vendors may not dictate purchases of goods or services from them simply because they are customers of Horizon.

Respect and Integrity in the Workplace - Worker safety, health and the protection of the environment are essential priorities for Horizon. No type of violent or threatening behavior by a Vendor's employees is permitted, including threats, threatening language or any other acts of aggression or violence against anyone while conducting Horizon business. While working on Horizon's premises, or while engaging in Horizon business, Vendor's employees shall follow all Horizon rules related to safety and security. Vendor's employees, while on Horizon property, must wear Horizon-issued identification at all times. The Vendor's employee may not give or loan the identification to anyone, nor borrow anyone else's Horizon identification badge or swipe their identification badge on behalf of anyone else, at any time, under any circumstance. In addition, the Vendor's employee may not use the identification card to allow access to anyone else to enter a Horizon facility or restricted area within a Horizon facility.

There is no tolerance for any form of discrimination or harassment, including sexual harassment, in the workplace. Discrimination and harassment are prohibited against any of the Vendor's or Horizon's employees by reason of age, race, creed, religion, color, gender, pregnancy, national origin, marital status, sexual orientation, or any other protected class that is protected under any federal, state or local law, regulation or standard.

The possession, use, sale or purchase of illegal drugs, or the abuse of legal drugs or alcohol, on Horizon premises, anywhere while conducting Horizon business, or in any situation where an individual may be identified as being associated with Horizon, is strictly prohibited.

Protecting Horizon Assets - Horizon resources may not be used for personal or financial gain unrelated to Horizon business. Misuse of Horizon assets may result in the denial or restriction of access to those assets and may subject the Vendor to action up to, and including, termination of the business relationship. Vendors may use Horizon assets only to provide services or fulfill their contractual obligations to Horizon, with permission from Horizon. Horizon assets include all physical property, information systems, work time, and information about Horizon, its business, members, employees, customers and vendors, intellectual property, and Horizon funds.

Vendors should have no expectation of privacy regarding communications produced with the use of Horizon assets. Horizon may review and disclose any communication or other material produced with the use of Horizon assets, without a Vendor's knowledge or permission, for any legitimate business purpose. This includes e-mail, instant messaging, voicemail and other electronic communications systems.

Safeguarding Horizon Information - Horizon is committed to protecting its members' and customers' Private Information, as well as our own confidential information. Private Information includes our members' Protected

Health Information (“PHI”), as well as any other information we collect about our members, and confidential information includes Horizon proprietary information. All Horizon information, files and documents are considered confidential information.

Various state and federal laws and regulations, including the Health Insurance Portability and Accountability Act (“HIPAA”), govern Horizon’s use and disclosure of its members’ Private Information. Private Information may not be used or disclosed except as permitted by Horizon’s policies and applicable privacy and security rules. Generally, that means for the purpose of treatment, payment or health care operations, and with the member’s authorization.

In addition, when using, disclosing or requesting Private Information, HIPAA requires that only the minimum information necessary to accomplish a task be used, disclosed or requested. Using more than the minimum information necessary is a violation of Horizon policy and may be a violation of the law.

In addition, generally, Vendors who provide services to, or on behalf of, Horizon and require the use and disclosure of Private Information to perform those functions are considered Business Associates. Any Vendor who is a Business Associate must enter into a Business Associate Agreement with Horizon, as required by HIPAA.

A Vendor who is a Business Associate of Horizon must report any activities that may compromise the security of the data or systems or the privacy of Horizon information in accordance with the terms of its Business Associate Agreement with Horizon. Vendors who are not Business Associates of Horizon must promptly report any activities that may compromise the security, privacy or confidentiality of Horizon information. Failure to immediately report a security, privacy or confidentiality breach or violation may result in termination of the Vendor’s business relationship with Horizon.

Vendors may not access, use or disclose private and confidential information unless they have a legitimate business need to do so and are performing an appropriate business function for Horizon. Vendors must protect private, proprietary and confidential information even after they are no longer associated with Horizon. When the relationship with Horizon ends, Vendors must return all private, proprietary and confidential information. This information may not be disclosed to any unauthorized entity, such as a different company or employer, and cannot be used for any purpose other than to further Horizon’s legitimate business interests.

Passwords and Access - All information used to access Horizon’s information systems, including user IDs, access codes, computer passwords and password protected information (collectively, “Access Codes”) is completely confidential. Access Codes are to be used for the business purpose for which they were issued. Sharing Access Codes or using another person’s Access Code is prohibited. Violations may result in termination of the Vendor’s business relationship with Horizon.

Books and Records - In conducting business with Horizon, Vendors are expected to follow all laws, rules, standards and Horizon policies and procedures when accessing, creating and managing records. Vendors must maintain records that are accurate in all material respects. Additionally, Vendors must not hide, fail to record or make false entries.

Vendors must retain accurate and complete records of all matters related to their business with Horizon for the period of time required by applicable laws, regulations and contract requirements, whichever is longest.

When litigation or a governmental investigation, examination or audit is pending or threatened, relevant records must not be destroyed until that audit, examination, lawsuit or investigation is concluded. Horizon’s Legal Affairs Division or the Vendor’s Horizon business contact will advise the Vendor of any document preservation or other requirements related to any audit, examination, lawsuit or investigation. Destruction or other alteration of documents or records in contemplation of an actual or possible legal proceeding or a governmental audit, investigation or examination could result in a criminal offense and may adversely affect Horizon in a pending litigation or governmental investigation.

Horizon’s Intellectual Property - Horizon’s intellectual property is one of its most valuable assets. Intellectual property includes the product of any work created, made, developed, written or conceived which:

- resulted from work performed on behalf of Horizon;
- used Horizon equipment, materials, computer programs or facilities; or
- used Horizon's confidential or proprietary information.

Horizon's intellectual property may not be shared with others outside of Horizon, unless specifically authorized, in writing, by Horizon. When the Vendor's relationship with Horizon ends, all of Horizon's intellectual property, any third party intellectual property made available while associated with Horizon, and any other work products that are in the Vendor's possession must be returned to Horizon.

Intellectual Property Rights of Others - Horizon respects the intellectual property of others, and Vendors may not use or copy any copyrighted work without the approval of the copyright owner or its authorized agent. Generally, trademarks may be used as permitted by the license terms. When using Horizon systems and equipment, Horizon security policies and procedures must be followed. Only software that is properly licensed by Horizon is permitted on Horizon computers.

Fair Competition and Business Practices - Horizon competes fairly in the marketplace and conducts its business with honesty and a commitment to compliance and ethics. Interactions must always be fair and in keeping with ethical business practices. Horizon strictly adheres to all federal and state antitrust laws, and expects its Vendors to as well. Violation of these laws, regardless of intent, exposes Horizon, and individuals involved, to significant civil and criminal penalties, including fines and imprisonment. All forms of bribery are prohibited. Horizon expects its Vendors to comply with all applicable anti-corruption and anti-bribery laws.

Interacting with the Government - Any Vendors who are authorized to act on behalf of Horizon with any governmental body or federal or state regulatory agency must do so in a direct, open, respectful and ethical manner. No action may be taken that could mislead any governmental representative. Additionally, Vendors must know and comply with the terms of any applicable government contract.

Vendors shall comply with all reasonable requests of authorized officials and governmental agencies. This includes cooperating to provide access to records or facilities, as required by law or regulation. If a Vendor is contacted in reference to a governmental inquiry, or at the start of any unscheduled audit, inquiry or document production request, the Vendor must contact the Horizon Legal Affairs Department or the Horizon Compliance and Ethics Office.

All Vendors must comply with all requirements that apply to the governmental contracting process. No payment of money, gifts, services, entertainment or anything of value may be offered to any government official or employee. No kickbacks or anything of value in connection with activities involving a contract, including a government contract, may be accepted.

Federal Health Care Programs - Vendors are responsible for screening their Workforce Members to ensure that no entity or individual has been debarred or excluded or is otherwise ineligible for participation in federal health care programs (including Medicare and Medicaid). Such screening must occur at the time of hire, or contracting, and at least monthly thereafter. Horizon will not do business with any individuals or entities who have been debarred or excluded. Vendors must notify Horizon's Compliance and Ethics Office if they, or any of their employees, agents or subcontractors, have been debarred or excluded from any federal health care program. Anyone identified as being debarred or excluded must be removed from servicing Horizon business.

Compliance Contacts

In addition to the Vendor's Horizon business contact, a Vendor may obtain advice or report any violation or suspected compliance violations, to:

Horizon Compliance Integrity Help Line	800-658-6781
Horizon Compliance and Ethics Office	973-466-7100 or 973-466-4544 ComplianceandEthicsOffice@HorizonBlue.com
Horizon Privacy Center of Excellence	973-466-7669 PrivacyOffice-Legal@HorizonBlue.com
Horizon Information and Cyber Security Office	Abuse@HorizonBlue.com
Horizon Special Investigations	973-466-8723
Horizon Medicare Part D Fraud, Waste and Abuse Hotline	888-889-2231
Horizon Medicare Advantage Fraud, Waste and Abuse Hotline	800-624-2048
Horizon Fraud Hotline	800-624-2048
Horizon Legal Affairs	973-466-7737
Horizon NJ Health Medicaid Fraud Hotline	855-372-8320

Key Regulatory Requirements

Vendors are required to follow the spirit and the letter of the laws and regulations to which Horizon is subject. While the listing below is not inclusive of all of such laws and regulations, it does provide an overview of some important requirements that apply to Horizon's business.

Fraud, Waste and Abuse

Medicare Regulations and Guidelines from the Centers for Medicare and 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.

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

The Anti-Kickback Statute prohibits knowingly and willfully offering, 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 they have 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 the assistance on follow-up actions to be taken.

Privacy and Security

The Health Insurance Portability and Accountability Act ("HIPAA") requires health plans, providers, clearing houses and their business associates 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 Patient Protection and Affordable Care Act requires transparency along with the expansion of Medicaid eligibility requirements.

Note: This Vendor Code sets forth general principles with which Vendors must comply. More restrictive requirements may be set forth in the Business Agreement with Horizon. In addition, this Vendor Code will be automatically amended to incorporate any change or modification of applicable state or federal law, regulation or standard as of the effective date of the change or modification.

[1] The term "Vendors" includes all individuals, companies or others working for, or on behalf of, Horizon directly, or indirectly and all suppliers, vendors, health care providers, pharmacies and first-tier, downstream and related entities and their vendors.

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