



Dear Employee:

This Code of Conduct (“Code”) provides guidance to ensure that our work is done in an ethical and legal manner. It emphasizes a dedication to fostering an environment of honest and responsible behavior. It contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is critical to our future.

If you have questions regarding this Code or come across any situation that you believe violates provisions of this Code, you should immediately consult your supervisor, another member of the Piedmont management, or the Piedmont Compliance Department. You may also call the independently run hotline anonymously at 1-800-713-4703. You have our assurance there will be no retribution for asking questions or raising concerns about the Code or for reporting possible improper conduct.

We are committed to the ideals reflected in this Code. We are equally committed to ensuring that our actions consistently reflect our words. To achieve this, we expect all our colleagues' actions to reflect the high standards set forth in this Code. However, no written code of conduct can substitute for our own internal sense of fairness, honesty, and integrity. If you run into a situation or are considering a course of action which may be technically within the guidelines of this Code, but are concerned that the contemplated action simply “does not feel right,” please discuss the situation with any of the resources listed above.

In closing, we trust you as a valuable member of our team. We ask you to assist us in supporting the values and principles that are critical to Piedmont’s continued success.

Sincerely,

Lewis Addison

Chairman of the Board
Piedmont Community Health Plan

Richard Tugman

President and Chief Executive Officer
Piedmont Community Health Plan

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(Note: All references to "Piedmont", "the Health Plan", or the "organization" in this Code of Conduct refer to Piedmont Community Health Plan, Inc., Piedmont Community HealthCare, Inc., and Piedmont Community Healthcare HMO, Inc. and/or its affiliates, as applicable.)

I. PURPOSE

This Code of Conduct (“Code”) reflects Piedmont’s commitment to quality, honesty and integrity in everything we do. It is an integral part of the operations of Piedmont and is provided to ensure that Piedmont will comply with ethical standards and applicable laws and regulations. It sets forth principles to be upheld within day-to-day activities by all employees and business partners or associates.

Our Code is designed to serve two purposes:

- To communicate Piedmont’s commitment to compliance with laws, regulations, standards of care, ethical business practices and the basic standards expected in the work place;

and

- To ensure that all employees understand their responsibility for keeping Piedmont in full compliance with these laws and regulations and specifically their responsibility as part of the Compliance Program.

Our Code has the full endorsement of the Board of Directors, as well as the management team. While this document does not cover the specifics of every situation that you may encounter, it does provide a resource to direct you when you have questions. The management team stands ready to answer your questions about this document and the compliance program in general.

All employees, brokers, agents, managers, officers, directors, Board of Directors, first tier, downstream and related entities should carefully review and understand this document and complete the appropriate Attestation form. The Attestation will certify in writing that you have read the Code, will act in compliance with it, and will report any known violations. Violation of the Code can result in disciplinary action, up to and including termination. Violation of the Code can also result in possible fines or criminal penalties from the federal, state or local government.

MISSION

Our mission is to provide comprehensive quality healthcare coverage to the residents of Central Virginia and neighboring communities in partnership with those who share a commitment of access to medical care that represents the highest standards for quality and efficiency.

VISION

Our vision is to provide efficient and quality healthcare coverage to the local community through a network of physicians and hospitals. By doing so, we help hold down healthcare costs through medical management efforts and lower administration costs. Superior customer service, account management, and claims administration will be key components of success.

VALUES

- **We are committed.** We conduct ourselves in a manner that adheres to compliance and organizational integrity and promotes both the letter and spirit of the Code.
- **We are dedicated.** We learn the laws and regulations that govern our business and are diligent in keeping current on regulatory changes.
- **We are honest.** We comply with laws and regulations and monitor actions for reasonableness, necessity, accuracy, appropriateness and completeness.
- **We use good judgment.** We do not engage in any activity that might create a conflict of interest for ourselves or the company.
- **We are courageous.** We speak up for what is right. We report wrongdoing when we see it including illegal or unethical conduct, fraud, waste, and abuse.
- **We are responsible.** We accept the consequences of our actions. We admit our mistakes and quickly fix them. We don’t retaliate against those who try to do the right thing by asking questions or raising concerns.

- **We are trustworthy.** We protect the privacy of our members and the confidentiality of sensitive business information about Piedmont.
- **We treat others with respect.** We value our members, colleagues, and community and maintain fairness in all relationships. We are open and transparent in our communications with each other.

II. LEADERSHIP RESPONSIBILITIES

While all Piedmont employees are obligated to follow this Code, we expect our leaders to set the example, to be in every respect a model for others in the organization. They must ensure that those on their team have sufficient information to comply with applicable laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture within Piedmont that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to express concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

III. FUNDAMENTAL COMMITMENT TO STAKEHOLDERS

We affirm the following commitments to Piedmont stakeholders:

To Our Members: Each member is to be treated in an ethical and dignified manner. We are committed to providing quality, affordable health care with access to a network of credentialed healthcare providers, access to customer service units to assist members, and access to a complaint and grievance process for timely problem resolution.

To Our Employees: We are committed to a work setting which treats all employees with fairness, dignity, and respect. It affords them an opportunity to develop professionally and to work in a team environment in which all ideas are considered.

To Our Affiliated Providers: We are dedicated to dealing with our affiliated providers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for delivering quality health services and bringing efficiency and cost-effectiveness to health care.

To Our Regulators: We are committed to an environment in which compliance with rules, regulations, and sound business practices is woven into the corporate culture. We accept the responsibility to aggressively self-govern and monitor adherence to the requirements of law and to our Code.

To the Communities We Serve: We are committed to understanding the particular needs of the communities we serve and arranging and managing quality, cost-effective health services for these communities. We realize as an organization that we have a responsibility to help those in need.

To Our Contracted Business Partners: We are committed to fair competition among prospective business partners and the sense of responsibility required in a sound business relationship. We are dedicated to dealing with our business partners in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for delivering quality services and bringing efficiency and cost-effectiveness to health care.

IV. QUALITY IMPROVEMENT

Quality Assessment and Improvement Programs

Piedmont is committed to the continuous quality improvement of the care and services provided to our members through an effective, measurable, and organization-wide Quality Improvement (QI) Program. The QI Program is designed to improve the health of our members; deliver healthcare services in an efficient, cost-effective manner using evidence-based guidelines; and evaluate services by monitoring systematic, objective measures, and implement improvement plans based upon these findings.

Medical Management

Medical management includes preauthorization, concurrent review, discharge planning, case management, and disease management services. Piedmont relies on a coordinated team working together in determining and authorizing the effectiveness and appropriateness of recommended patient/member care.

Piedmont is committed to having an exception process, directed by a chief medical officer, available for cases in which a participating physician believes that a medical management determination does not adequately account for the unique characteristics of an individual member, based on relevant medical evidence offered by the participating physician for review.

Prescription Drug Formularies

Piedmont pledges to maintain physician and/or pharmacist involvement in the development and review of lists of covered prescriptions.

V. REGULATORY COMPLIANCE

Piedmont provides various services pursuant to appropriate federal, state, and local laws and regulations. Such laws and regulations may include subjects such as licenses, accreditation, access to treatment, continuity of care, access to records, confidentiality, members' rights, terminal care decision-making, credentialing and clinical privileges, and Medicare regulations. The organization is subject to numerous other laws in addition to these health care regulations.

We will comply with all applicable laws and regulations. All employees, providers, and delegated entities must be knowledgeable about and ensure compliance with all laws and regulations, and should immediately report violations or suspected violations to a supervisor or member of management, the Compliance Department or the independently run hotline at 1-800-713-4703.

Piedmont will be forthright in dealing with any regulatory or contractual inquiries. Requests for information will be answered with complete, factual, and accurate information. We will cooperate with and be courteous to all governmental inspectors and provide them with the information to which they are entitled during an inspection.

During a government inspection, Piedmont must never conceal, destroy, or alter any documents, lie, or make misleading statements to the government representative. Piedmont employees will not attempt to cause another employee to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

To ensure that we meet regulatory obligations, Piedmont employees will be informed about stated areas of potential compliance concern. Piedmont will provide its employees with the information and education they need to comply with applicable laws and regulations.

VI. DEALING WITH REGULATORY AGENCIES

The scope of matters related to regulatory oversight is significant and broader than the scope of this Code. The purpose of our Code is to provide general guidance on subjects of wide interest within the organization.

Piedmont will deal with all regulatory agencies in a direct, open and honest manner. No action should ever be taken in relationships with regulatory agencies that would mislead the regulator or its survey teams, either directly or indirectly.

VII. BUSINESS INFORMATION AND INFORMATION SYSTEMS

A. Accuracy, Retention, and Disposal of Documents and Records

Piedmont's documents and records must accurately and fairly reflect the business transactions and assets of Piedmont. No business

records, including records pertaining to the provision of healthcare services, should ever be falsified or altered. Piedmont employees, providers, and vendors also must not create or participate in creating records that have the effect of misleading or of concealing improprieties.

Business documents and records are retained in accordance with the law and our business documents policy. Business documents include paper documents such as letters and memos, claims, enrollment applications; computer-based information such as e-mail or computer files on disk or tape; and any other medium that contains information about the organization or its business activities. It is important to retain or destroy records appropriately and in accordance with our policy. Employees must not tamper with records, nor remove or destroy them prior to the specified date.

B. Confidential, Proprietary, and Privacy Information

Confidential information about our organization's strategies and operations is a company asset. Although you may use confidential information to perform your job, it must not be shared with others outside of Piedmont or your department unless the individuals have a legitimate need to know this information and have agreed to maintain the confidentiality of the information. Confidential information includes, but is not limited to, personnel data maintained by the organization, member lists and clinical information, pricing and cost data, information pertaining to acquisitions, divestitures, affiliations and mergers, financial data, research data, strategic plans, marketing strategies, techniques, employee lists and data maintained by the organization, supplier and subcontractor information, and proprietary computer software.

All Piedmont employees, providers, and vendors are required to abide by the rules and regulations of the Health Insurance Portability and

Accountability Act (HIPAA) and any applicable state laws concerning the privacy of patient health information. We may make use of such information only for purposes of carrying out our job responsibilities, and we must comply with all safeguards established by Piedmont for this purpose.

C. Electronic Media

All communications systems, electronic mail, Intranet, Internet access, or voicemail are the property of the organization and are to be primarily used for business purposes. Limited reasonable personal use of Piedmont communications systems is permitted; however, you should assume that these communications are not private. Member or confidential information should not be made available online or sent through the Internet until such time that its confidentiality can be assured.

Piedmont reserves the right to access, monitor, and disclose the contents of email and voicemail messages. Access and disclosure of individual employee messages may be done only with the approval of Human Resources.

Employees may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening, knowingly-reckless, maliciously-false, or obscene materials, including anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages, or copyrighted documents that are not authorized for reproduction.

Employees who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

D. Financial Reporting and Records

We have established and maintained a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted insurance accounting principles. No undisclosed or unrecorded funds or assets may be established. Piedmont maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner to maintain accountability of the organization's assets.

VIII. WORKPLACE CONDUCT AND EMPLOYMENT PRACTICES

A. Conflict of Interest

A conflict of interest may occur if outside activities or personal interests influence or appear to influence an employee's ability to make objective decisions in their job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract employees from the performance of their job or cause them to use Piedmont resources for other than Piedmont purposes. It is the employee's obligation to ensure that they remain free of conflicts of interest in the performance of their responsibilities at Piedmont. If there are questions about whether an outside activity constitutes a conflict of interest, approval of your supervisor must be obtained before pursuing the activity.

B. Equal Employment Opportunity

Our employees provide us with a wide complement of talents that contribute greatly to our success. We are committed to providing an equal opportunity work environment where

everyone is treated with fairness, dignity, and respect. We will comply with all laws, regulations, and policies related to nondiscrimination in our personnel actions, including hiring, terminations, staff reductions, transfers, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

No one shall discriminate against any individual with a disability with respect to any offer, term, or condition of employment. We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

C. Harassment and Workplace Violence

Each Piedmont employee has the right to work in an environment free of harassment. We will not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at Piedmont.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking cases, violence directed at the employer, terrorism, and hate crimes committed by current or former employees. As part of our commitment to a safe workplace for our employees, we prohibit employees from possessing firearms, other weapons, explosive devices, or other dangerous materials on Piedmont premises. Employees who observe or experience any form of harassment or

violence should report the incident to their supervisor, the Human Resources Department, a member of management, the Compliance Officer, or the independently run hotline.

D. License and Certification Renewals

Employees and individuals retained as independent contractors in positions which require professional licenses, certifications, or other credentials are responsible for keeping their credentials current and shall comply at all times with federal and state requirements applicable to their respective disciplines. To ensure compliance, Piedmont may require evidence of the individual having a current license or credential status.

Piedmont will not allow any employee or independent contractor to work without valid, current licenses or credentials.

E. Personal Use of Piedmont Resources

It is the responsibility of each Piedmont employee to preserve our organization's assets including time, materials, supplies, equipment, and information.

Organization assets are to be maintained for business-related purposes. The personal use of any Piedmont asset without the prior approval of your supervisor is prohibited. The occasional use of items, such as copying facilities or telephones, where the cost to Piedmont is insignificant, is permissible. Any community or charitable use of organization resources must be approved in advance by your supervisor. Any use of organization resources for personal financial gain unrelated to Piedmont's business is prohibited.

F. Employee Working Relationships

In the normal day-to-day functions of an organization like Piedmont, there are issues that arise which relate to how people in the organization interact with one another. It is impossible to foresee all the issues that may arise, however, the following items warrant guidance for all Piedmont employees:

Gift Giving - While we wish to avoid any strict rules, no one should ever feel compelled to give a gift to anyone. Any gifts offered or received should be appropriate to the circumstances. Any excessive gift from an individual employee to their own supervisor would violate organizational policy.

Fundraising - No employee should ever feel compelled to participate in fundraising efforts that are a request from a supervisor or colleague.

Personal Relationships - No employee should directly supervise an immediate family member, including but not limited to mother, father, grandparent, husband, wife, son, daughter, grandchild, sister, brother, or in-law. No employee should directly or indirectly supervise a romantic partner.

G. Managing Subcontractors, Suppliers, Consultants, Agents and Representatives

Many individuals and organizations that are not employed by Piedmont work closely with us as board members, vendors, consultants, agents, independent contractors, interns, medical professionals and specialists, volunteers and business partners. Each of these individuals and groups must be willing to certify their compliance with applicable compliance policies and procedures while conducting business with, or on behalf of Piedmont. Piedmont acknowledges these groups may have their own code of conduct and they may follow it if such code does not conflict with Piedmont's Code. Additionally, each of these individuals and groups may be required to complete compliance and fraud, waste and abuse training as required by federal health care regulations.

We must manage our subcontractors and suppliers in a fair and reasonable manner, consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent

practicable. Our selection of subcontractors, suppliers, and vendors will be based on objective criteria including quality, technical excellence, price, delivery, adherence to schedules, services, and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier's ability to meet our needs, and not on personal relationships or friendships. We will always employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We will not communicate to a third-party confidential information given to us by our suppliers unless directed in writing to do so by the supplier. We will not disclose contract pricing and information to any outside parties.

H. Substance Abuse and Mental Acuity

To protect the interests of our employees and members, we are committed to an alcohol- and drug-free work environment. Reporting to work under the influence of any illegal drug or alcohol, having an illegal drug in your system, or using, possessing, or selling illegal drugs while on Piedmont work time or property may result in immediate termination. We may use drug testing to enforce this policy.

It is also recognized that individuals may be taking prescription drugs which could impair judgment or other skills required in job performance. If you have questions about the effect of such medication on your performance, consult with your supervisor. Piedmont strives to maintain a smoke-free environment. Smoking or vaping is strictly prohibited on Piedmont property.

IX. MARKETING PRACTICES

A. Antitrust

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Discussing Piedmont business with a competitor could violate these laws, such as how our prices are

set or disclosing the terms of business partner relationships. Our competitors are other health insurers in markets where we operate.

At trade association meetings, Piedmont employees must be alert to potential situations where it may not be appropriate to participate in discussions regarding prohibited subjects with our competitors. Prohibited subjects include any aspect of pricing, our services in the market, key factors such as labor costs, and marketing plans. If a competitor raises a prohibited subject, employees must end the conversation immediately. In general, employees must avoid discussing sensitive topics with competitors or suppliers.

B. Gathering Information About Competitors

It is not unusual to obtain information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information.

However, it is not acceptable for you to obtain proprietary or confidential information about a competitor through illegal means. It is also not acceptable to seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

C. Marketing and Advertising

We may use marketing and advertising activities to educate the public, provide information to the community, increase awareness and usage of our services, and to recruit employees. We will present only truthful, fully informative, and non-deceptive information in these materials and announcements.

X. BUSINESS COURTESIES

Occasionally, we might be offered gifts or other tokens of appreciation from vendors,

members, patients, their families, customers, competitors and others. In many industries, entertaining customers and exchanging gifts are customary practices, but in health care, we are in a unique position of trust. Our patients and members need to know that the work we do is not inappropriately influenced by gifts and other offers from the people with whom we do business.

The receipt of excessive gifts, gratuities or the sponsoring of entertainment from those seeking to influence business decisions of Piedmont should be politely declined. You should recognize that even if you believe that the acceptance of such a gift, gratuity, or participation in entertainment will not influence your decision, the person making the gesture may have the perception that the action will have such influence.

Courtesies such as meals, beverages, and/or other entertainment should be scrutinized. When meals or refreshments are provided as part of a business meeting or part of an agenda at a third party, accredited professional meeting where continuing education credit is awarded, and where it is normal business adjunct to a business meeting or accredited professional gathering as described above, and the value of the entertainment does not exceed a nominal value, participation is permissible. These exceptions do not permit any gifts or other benefits that are understood to be offered or provided as an inducement to refer business or as a reward for such referrals.

If you have any doubt about whether it would be appropriate to accept or give a gift, entertainment offer, meal or other item or service, you must consult with your supervisor or the Compliance Department.

XI. COMPLIANCE PROGRAM

A. Program Structure

Piedmont's Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to

the highest standards of ethics and compliance. That commitment permeates all levels of the organization. There is oversight via the Board of Directors and Piedmont's Compliance Committee, consisting of senior management. In addition, Piedmont has a Compliance Officer who serves as liaison to the Board of Directors and Compliance Specialists who play a key role in helping to administer the Compliance Program. A list of the current Compliance Team is available on Piedmont SharePoint Homepage under Compliance. These individuals and groups are prepared to support you in meeting the standards set forth in this Code.

B. Resources for Guidance and Reporting Violations

To obtain guidance on an ethics or compliance issue, to report a suspected violation or to report potential fraud, waste and abuse, you may choose from several options. We encourage the resolution of issues at a departmental level whenever possible. It is an expected good practice, when you are comfortable with it and think it appropriate under the circumstances, to raise concerns first with your supervisor. If this is uncomfortable or inappropriate, another option is to discuss the situation with another member of Piedmont management or by contacting the Compliance Department. You are always free to contact the hotline at 1-800-713-4703.

Piedmont will make every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports possible misconduct. There will be no retribution or discipline for anyone who reports a possible violation in good faith. Any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another employee will be subject to discipline.

C. Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing

wherever it may occur in the organization. Each employee has an individual responsibility for reporting activity by any employee, physician, subcontractor or vendor that appears to violate applicable laws, rules, regulations, or this Code.

D. Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The Compliance Department will work with the appropriate staff to coordinate any findings from the investigations and immediately recommend corrective action or changes that need to be made. We expect all employees to cooperate with investigation efforts.

E. Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future.

F. Discipline

All violators of the Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any of the following disciplinary actions:

- 1.) Verbal warning
- 2.) Written warning
- 3.) Written reprimand
- 4.) Suspension
- 5.) Termination
- 6.) Restitution

G. Internal Audit & Other Monitoring

Piedmont is committed to the aggressive monitoring of compliance with its policies. Much of this monitoring effort is achieved by

internal audits of issues that have regulatory or compliance implications. The organization also routinely seeks other means of ensuring and demonstrating compliance with laws, regulations, and Piedmont policy.

H. Acknowledgment Process

Piedmont requires all employees to sign an acknowledgment confirming they have received the Code and understand that it represents mandatory policies of Piedmont. New employees will be required to sign this acknowledgment as a condition of employment.

Adherence to and support of Piedmont's Code and participation in related activities and training will be considered in decisions regarding hiring, promotion, and compensation for all candidates and employees.

XII. QUESTIONS AND ANSWERS

The Code is not intended to provide answers to every question that you may have about Piedmont's policies, laws, or regulations. The following questions and answers are intended to increase your understanding of how the specific guidelines must be applied.

THE COMPLIANCE PROGRAM

If I have a question about workplace conduct or if I see something that I think is wrong, whom should I contact?

We have provided several resources for you to turn to with such concerns. We encourage you to talk to your supervisor first. However, if for any reason you do not feel comfortable talking to your supervisor or if your supervisor did not answer the question or address the problem to your satisfaction, you do have other options. You may wish to speak with someone else in management, contact the Compliance Department or call the hotline at 1-800-713-4703. We encourage all employees to try to resolve matters locally

when possible and appropriate.

What happens if I report something suspicious and my suspicion turns out to be wrong?

Our policy prohibits reprimanding or disciplining an employee who reports a violation of the Code. As a Piedmont employee, you have a responsibility to report suspected problems. In fact, employees may be subject to discipline if they witness something but do not report it to the company. The only time someone will be disciplined for reporting misconduct is if he or she knowingly and intentionally reports something that he or she knows to be false or misleading to harm someone else.

What should I do if my supervisor asks me to do something that I think violates the Code of Conduct, Piedmont policy, or is illegal?

Don't do it. No matter who asks you to do something, if you know it is wrong, you must refuse to do it. You must also immediately report the request to a level of management above your supervisor or to the hotline.

ETHICAL BEHAVIOR IN GENERAL

How do I know if I am on ethical "thin ice?"

If you are worried about whether your actions will be discovered, if you feel a sense of uneasiness about what you are doing, or if you are rationalizing your activities on any basis (perhaps using the rationale that "everyone does it"), you are probably on ethical "thin ice." If you believe you are on ethical "thin ice," consider redirecting your actions so that you know you are doing the right thing. If necessary, contact your supervisor or compliance department.

ACCURACY, RETENTION, AND DISPOSAL OF DOCUMENTS

In preparing for a government audit, my supervisor has asked me to review documents and change dates to meet timeliness standards. May I do this?

No. It is our obligation to provide only complete and fully accurate information to government regulators, accrediting bodies, and internal auditors. If you are asked to amend information with the intent to mislead any of these entities, you will be in violation of the Code. We recommend notifying the compliance department or another member of management if you are asked to perform a duty that is in violation of the Code.

BUSINESS COURTESIES

A member with a chronic health condition is assisted by a case management nurse on a routine basis. The member routinely tips his "primary" nurse around \$100. Should the nurse accept it?

No. Cash gifts must never be accepted from anyone with whom we have a business relationship.

CONFLICTS OF INTEREST

I am planning a working lunch for our department. My son owns a catering service in town. May I hire his catering service if the prices are comparable to other restaurants?

No. This may seem unfair, but you must avoid even the appearance of favoritism.

Do the conflict of interest policies apply to distant relatives, such as cousins or in-laws or friends?

The conflict of interest policies generally apply to members of your immediate family. However, if any relationship could influence your objectivity or appears to be improper, you must apply the policies.

MEMBER INFORMATION

My neighbor has a friend who is sick and has Piedmont insurance. He sometimes requests updates on the health of his friend, such as the name of his doctor, his diagnosis or treatment information, etc. Am I allowed to give him information about his friend's health?

No. Access to and release of this type of information without the member's authorization is strictly prohibited. We are responsible for protecting the confidentiality of member information from interested third parties as well as our staff. Members are entitled to expect confidentiality, the protection of their privacy, and the release of information only to authorized parties.

PERSONAL USE OF ORGANIZATION RESOURCES

Can I type my spouse's resume on my computer?

Possibly. If you use the computer during non-working hours, you may be allowed to type personal documents. Ask your supervisor.

I volunteer for an organization. May I make copies of a fundraising leaflet?

Piedmont equipment, supplies, or time must not be used for charitable or other non-business purposes without prior approval from your supervisor.

Is it allowable for me (as an employee) to give my building access device (i.e., key, key fob, badge, etc.) to another employee or contractor (or any other individual) for their use to gain access to the building or other areas operated by Piedmont?

No. It is in violation of policy to allow another individual to use the building access device(s) with which you (as an employee)

were entrusted. Piedmont workforce members who violate this policy are subject to discipline, up to and including termination.

This Code is intended to direct and instruct the Piedmont workforce. As a subsidiary of Centra, we are also obligated to follow Centra's Code of Conduct. For further clarification, please refer to Centra's Code of Conduct, Centra's Policies and/or Piedmont's Policies and Procedures.