



APPLECARE
MEDICAL MANAGEMENT

What's Best for You

*Principles of Ethics & Integrity
Your Guide to Business
Conduct*



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INTRODUCTION

Commitment to Integrity

Honesty and integrity are core values of our organization. Our commitment to these values has helped us earn a reputation as an organization that health care providers and health plans can engage in solid, long term business arrangements.

The need to make sound, ethical decisions as we interact with participants, customers, regulators, physicians and other health care providers, investors, suppliers, colleagues and communities has never been greater. It's not only the right thing to do, it's necessary for success now and in the future.

Because AppleCare is committed to the highest standards of integrity, the company implemented this Principles of Ethics and Integrity guide.

Company Policies

These Principles are meant to alert employees to major legal and ethical issues that may arise. It is not a detailed rule book.

These Principles outline many, but not all, of AppleCare's business conduct policies. Policies that are generally applicable to most employees are available in AppleCare's Employee Manual on the AppleCare Intranet website. Employees are responsible for being familiar with the policies in the Employee Manual. If you do not have access to the AppleCare Intranet and want a copy of a policy, ask your manager or call the Human Resources department.

In addition to the policies in the Employee Manual, there are many policies that specifically relate to certain departments or products. Each department will communicate these specific policies to employees and others who are affected by them and who must comply with them as they conduct business for the company.

These Principles and other company policies can not address every situation employees may encounter. Consequently, AppleCare relies on the good judgment and values of its employees and managers to implement the intent of these Principles when company policies do not address a specific situation. If an employee is still not sure what to do, the employee should request guidance from the resources identified in these Principles.

Personal Accountability

All of us are personally accountable for our decisions and actions. We each must follow a course of conduct that preserves and enhances AppleCare's reputation for honesty and integrity. To do so, it is critical that we understand the laws, company policies and contractual obligations that apply to our specific area. And, we should never misuse our authority, whether for personal interests or to the detriment of AppleCare.



Added Responsibility for Managers

While all AppleCare employees must follow these Principles of Ethics and Integrity, each AppleCare manager must be an example for those in his or her group. They must know these Principles, the Policy Manual and any departmental policies that apply to their area of responsibility. Managers must create and maintain a workplace where employees and contractors know that ethical and legal behavior is expected of them.

Contractor Accountability

In some cases, all or part of these Principles and other company policies may apply to those acting on behalf of the company such as sales agents, external advisors, contractors, consultants and others. The business person responsible for the relationship should decide if these Principles or any company policies apply to a contractor.

Violations and Consequences

Failure to follow these Principles of Ethics and Integrity, any other company policies, applicable laws and contractual obligations will compromise AppleCare's good name. Unethical or illegal acts cannot be justified by saying they were for the good of the company or were directed by a higher authority in the company. No employee is ever authorized to commit, or direct another employee to commit an unethical or illegal act. In addition, employees cannot use a contractor, agent, consultant, broker, distributor or other third party to perform any act not allowed by law, these Principles, any company policy or any applicable contractual obligation.

The goal of these Principles is to promote proper conduct and avoid the need for discipline. However, all violations of the law, these Principles, company policies and contractual obligations will be taken seriously and may result in discipline, up to and including termination.

In addition, employees who commit criminal or illegal acts may face immediate termination and possible legal action.



ASKING QUESTIONS AND REPORTING MISCONDUCTS

Resources to Questions

You may talk to your manager about any questions you may have and any action you believe may violate these Principles, the law, company policies or any contractual obligation. If you are not comfortable talking with your manager or you have already done so and you think the problem has not been completely resolved, there are several other resources you can contact, including:

- A more senior manager
- The Human Resources department
- A member of the executive management team
- The Compliance Officer
- The Ethics & Compliance hotline (877) 842-7954

Retaliation in any form against an individual who, in good faith, reports a suspected violation of these Principles or provides information related to such reports, Company policies, the law or contractual obligations, is prohibited.

Your Duty to Report Misconduct

To protect AppleCare's reputation – as well as your personal reputation – you must promptly report illegal or unethical conduct to an appropriate company representative. Failure to report suspected violations violates these Principles of Ethics and Integrity and can lead to discipline.

If you have any concerns about reporting the conduct to your manager or you have done so and the conduct has not been corrected, contact one of the resources identified above. Managers who receive reports of possible illegal or unethical conduct must take immediate action. The type of action that should be taken depends on the alleged misconduct. The manager should carefully identify and involve all possible stakeholders. If the matter involves employment issues or could affect an employee's employment status, the manager must contact the Human Resources department.

Cooperating with Internal Investigations

If the company initiates an investigation to determine whether there has been illegal or unethical conduct, you must cooperate with the investigation and disclose all information and records you are aware of that are relevant to or will assist the investigation. Failure to cooperate with an internal investigation violates these Principles and can lead to discipline.

Confidentiality, Retaliation and False Reports

To the extent possible, the company will take reasonable precautions to maintain the confidentiality of those who report an integrity or compliance concern.

Any retaliation against an employee who, in good faith, reports a suspected violation of these Principles, company policies, the law or contractual obligations, is not allowed and should be immediately reported to Human Resources, the Compliance Officer, or the Ethics and Compliance hotline.

Making malicious or purposely false reports also violates these Principles of Ethics and Integrity and will result in disciplinary action up to and including termination.



ACCURACY OF COMPANY RECORDS

AppleCare needs correct information and reliable records to make sound business decisions and to submit reports to customers and governmental agencies. You must be complete, accurate and honest when recording, reporting and retaining company information. This includes business records involving quality, safety and personnel, as well as time, expense and other financial records.

All business records produced by employees, including those kept off company premises, are the property of the company.

All financial books, records and accounts must correctly reflect transactions and events, and conform both to generally accepted accounting principles and to AppleCare's system of internal controls. Here are more guidelines to keep in mind:

- Do not make false or misleading entries or omit information in any of AppleCare's systems, books or records for any reason. Keep systems, books, records and accounts in reasonable detail so they correctly reflect transactions and events.
- Fill out expense reports and attendance reports correctly and completely and show the correct purpose and amount of each item on expense reports.
- The most senior employee at a function should include the costs for the function in an expense report.
- Do not create or keep secret or unrecorded funds, assets or accounts for any purpose.
- Never purposely pay or approve an invoice, expense report, or other document that is not correct, not accurate, or is misleading. Always use care when reviewing documents before approving them.
- Properly and consistently follow cost accounting standards and principles of cost allowability, as well as relevant company policies and procedures and contractual obligations.
- All invoices to customers and others should correctly note the products sold or services performed, the true sales price, and the terms of sale. Promptly refund payments that are more than amounts billed, or credit customer accounts.



BUSINESS COURTESIES

General

Gifts, favors, travel and entertainment may cause a conflict of interest with your work at AppleCare. As a result, always follow these simple guidelines:

- Never offer or accept a gift, favor, travel or entertainment of more than a nominal value, unless approved in advance by a supervisor.
- Never accept or provide gifts, favors, travel or entertainment of any value if it will compromise or appear to compromise your judgment.
- Never solicit gifts, favors, travel or entertainment, except for company approved causes.
- Never offer a gift, favor, travel or entertainment to a government employee unless you have confirmed with Human Resources in advance that you may do so.

To help you make the right decision, ask yourself these questions when giving or receiving any business courtesy:

- Is it legal, customary and in good taste?
- Is it clearly related to AppleCare business?
- Would I feel okay giving or receiving the gift or business courtesy in front of others?

If you have any doubts about the effects the gift, favor, travel or entertainment could have on the company's reputation or your personal reputation, you should not offer or accept it.

Please note that these guidelines apply to actions with those outside of AppleCare. This section does not apply to actions between the company and its employees, or actions among AppleCare employees.

Gifts

AppleCare's gift policy embraces a "rule of reason." As a general rule:

- You may accept gifts of nominal value, such as promotional items (T-shirts, mugs, baseball caps) given in the regular course of business. But, you should not accept small gifts on a regular or continual basis.
- Do not accept gifts of money or cash equivalents.
- When giving gifts, make sure they are in keeping with the business relationship and do not appear to be attempts to obligate or influence the recipient.
- Do not offer any gift, favor, travel or entertainment if it is against the policy of the recipient's organization. Many companies have policies that do not allow any gifts.
- In the case of the government, the offer of anything, sometimes even a cup of coffee, may be against the law.
- When in doubt, check with your manager, Human Resources, or call the Ethics & Compliance hotline (877) 842-7954.



Inducements

Also known as bribes or kickbacks, inducements are strictly prohibited. You cannot use any financial or other reward that could be seen as trying to induce:

- Potential enrollees to join a particular health plan.
- Employees and other licensed professionals to deny or limit care.
- Patients/clients/members to commit fraud, waste or abuse.

Offering or taking bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business is unethical, illegal and strictly forbidden.

Favors

Do not accept discounts when buying a supplier's or customer's products or services for personal use, unless the discounts are offered to AppleCare employees in general. Never solicit or accept special treatment on loans, stock offerings, or other services unless the treatment is available to all other employees.

Entertainment and Travel

Entertainment is often helpful in building and maintaining business relationships. AppleCare employees may accept invitations for entertainment that is reasonable in the context of the business, or that furthers the company's interests. For example, in most cases you may attend a cultural event, sporting event, or business meal with a business contact, or attend a supplier's holiday or celebratory function. But, generally you should not accept tickets for an event the business contact will not be attending, such as tickets for a sporting or cultural event.

Business courtesies involving travel and lodging are cause for more serious concern. You should not accept travel or lodging without your manager's consent.

You may not entertain guests, employees or customers where there is "adult entertainment", as this is not suitable for business purposes.

Government Employees

There are very strict rules about what may be offered to government employees. The rules depend on the nature of the relationship between AppleCare and the government employee.

If the government employee is a contract officer for a contract we have or are seeking, the rules are very strict. In that case very little, if anything, can be offered to the person. In some cases, you may not even be able to offer beverages or food during a meeting.

If the person is a member of a legislative staff, you may be able to offer meals or entertainment without breaking the law – but you need to make sure you strictly follow any restrictions that apply.

If you have regular contact with government employees, you must know and carefully follow the rules that apply to those employees.



COMPANY ASSETS, PROTECTION AND USE

Protecting Company Assets

AppleCare entrusts all employees with many company assets including financial assets, buildings, equipment, supplies and information assets, the time it pays employees to work and much more. Company assets must be maintained for business purposes and used for AppleCare's benefit. Everyone is responsible for protecting these assets from loss, damage, misuse or theft.

Use of Company Assets

As a general rule, personal use of AppleCare assets is not allowed. You may not use company resources for personal financial gain unrelated to the business of AppleCare.

Personal Use of Electronic Media

All communication systems, including phones, e-mail, the Intranet, Internet access, and voice mail belong to AppleCare and you must use them primarily for business purposes. You are allowed limited reasonable personal use of AppleCare's communication systems, but you should assume these communications are not private. AppleCare reserves the right to access, monitor and disclose the contents of phone calls, e-mail and voice mail messages and internet usage.

You may not use internal communication channels or Internet access at work to access, post, store, transmit, download or distribute threatening or malicious materials or materials you know or should know are false or sexually explicit. This includes anything that is a crime or promotes criminal activity, gives rise to civil liability, or violates any laws. Also, among other things, you may not use company communication channels to send chain letters, personal broadcast messages, copyrighted documents not approved for reproduction, or to open incorrectly addressed mail or look for a job outside of AppleCare. Also, use of electronic instant messaging, and downloading, storing and/or transmitting non-business related multi-media is prohibited.

Employees who abuse the company's communication systems or use them inappropriately for non-business reasons may lose these privileges and be subject to discipline, up to and including termination.

Intellectual Property

Among AppleCare's most valuable assets is its intellectual property. Intellectual property includes materials, inventions or ideas that are copyrighted, trademarked or patented and trade secret information. Trade secrets are valuable Company information and intellectual property used and known by AppleCare that may not be subject to patent, copyright or trademark protections, but are not generally known by our competitors or other third parties.

Intellectual property includes, but is not limited to, the following types of categories: inventions; new product or marketing plans; business strategies and plans; detailed financial and pricing information, computer programs, models and data bases (including without limitation source codes), designs, analytical models; customer lists and customer information, supplier and vendor lists and supplier and vendor information. This list of categories is not exclusive but suggests the wide array of information that may be entitled to trade secret protection.



AppleCare owns all intellectual property you make, create, develop, write or conceive either on your own or with another person while employed by or contracted with AppleCare and whether developed during working hours or after working hours that:

- is related in any manner to the actual or anticipated business, research or development of the company;
- results from work assigned to or performed by you for the company; or
- is conceived of or made with the use of the company's systems, equipment, materials, facilities, computer programs or confidential information.

Protection of Intellectual Property

AppleCare strives to protect its intellectual property through patents, copyrights, trademarks and treating other confidential and proprietary information as trade secrets.

You must carefully guard the secrecy of these trade secrets and confidential and proprietary information. Mark this information "Confidential," keep it secure, and limit access to only those who need to know it to perform their jobs. Be careful not to discuss such confidential or proprietary information in public areas. Similarly, be careful when working on a laptop computer in a public area where others can view your work. Many companies' secrets have been lost in elevators, restaurants, airplanes and other public places.

Your duty to guard AppleCare's confidential and proprietary information and trade secrets continues after you leave the Company. Keep in mind that trade secret information includes not only that information contained in written or digitized documents, but also includes all such information that you may have committed to memory during the course of your job.

Property Rights of Others

AppleCare believes in honoring copyrights and respecting the trade secrets of others. You must not make unapproved copies or reveal or use any trade secrets of a competitor, including a former employer, in connection with your duties at AppleCare. This includes customer lists, technical developments, or operational data.

If you obtain information by mistake that might be a trade secret or proprietary information of another company, immediately consult the Human Resources department or the Ethics & Compliance hotline (877) 842-7954.

Trademarks and the AppleCare Name

The AppleCare brand identity, including its name, logo, trademarks and service marks are among the company's most valuable assets. To protect these assets, you must use them correctly and only to advance the company's interests. Consult the Marketing department or a member of the Executive Team with questions or concerns about the use of AppleCare's trademarks or name.



Communications with AppleCare's Attorneys

Information you give AppleCare's attorneys to obtain legal advice about company business is generally protected by the attorney-client privilege. This privilege protects confidential attorney-client communications from being shared with others. You should keep these communications confidential and not share them with others, including other AppleCare employees, except on a need-to-know basis.

The attorney-client privilege belongs to the company, not to AppleCare employees. You should not consider anything you tell a company attorney to be protected from disclosure to management. You should also remember the attorneys are representing the company, not you.

You should not contact AppleCare's attorneys for advice about personal or employment issues. Human Resources is your resource for help with these issues.

Computer and Network Security

AppleCare's business depends upon the continuous, efficient operation of its computer systems and networks. The company has a large investment in these assets. You must guard their integrity. Do your part by protecting passwords, IDs and access to computer systems. Never download unauthorized software or software licensed for personal use onto company computers. All computers must be protected with virus protection software. Take steps to avoid "viruses" from the Internet or unauthorized software, and protect the company from lawsuits by using only legally licensed software that has been installed by the AppleCare Information Technology department.

Creating and Retaining Business Communications

Almost all business records and communications may become subject to public disclosure during litigation or governmental investigations. Business communications are also often obtained by outside parties or the media. As a result, you should try to be as clear, concise, truthful and accurate as possible when creating any information. Do not guess, exaggerate, use colorful language, legal conclusions, or negative characterizations of people or their motives. Remember that tone, such as sarcasm, can be misread and misinterpreted. This policy applies to communications of all kinds, including e-mail and "informal" notes or memos.

Always save and destroy records as stated in AppleCare's Records Management policy. If litigation, an audit, or a governmental investigation is pending, do not destroy any related records. Direct any questions about documents pertaining to litigation, an audit or an investigation to Executive Management.



CONFLICTS OF INTEREST

Business decisions and actions must be based on the best interests of AppleCare and not personal interests or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect your independent and sound judgment on behalf of AppleCare. Avoid any situation that causes or appears to cause a conflict of interest with AppleCare's interests.

Disclosures

The best way to avoid a conflict of interest is to disclose any relationships others might misinterpret. This includes any relationships with other employees, customers, suppliers and competitors. You should raise questions about possible conflicts of interest and disclose these kinds of situations to your manager or the Ethics & Compliance hotline as they arise.

Board Memberships

You may serve on the board of directors of community or nonprofit organizations if your role does not affect your ability to perform your job for AppleCare. To make sure such activities do not cause a conflict of interest or other problem with your position at AppleCare, you should tell your manager.

If you become a board member for another organization, you should ask about the type of indemnity and insurance it provides for board members. Except when you are a member of another organization's board at AppleCare's request, AppleCare will not indemnify you for anything that occurs as a result of your board membership.

You must not serve on the board of directors of any company that competes with AppleCare.

Employment and Activities Outside of AppleCare

You may not provide services to any business that competes with AppleCare. In addition, AppleCare employees generally may not accept payment for services they perform for AppleCare outside of their regular jobs.

A conflict of interest may arise if you are employed outside of AppleCare and it hinders your work for AppleCare. You must make sure any outside activities are strictly separate from your duties at AppleCare. You may not use AppleCare's time, resources or people for non-AppleCare employment activities.

Family Members

A conflict of interest may arise when doing business or competing with companies for which a family member works, or in which your family member has an ownership interest. You should disclose any such relationships to your manager.



Investments and Other Financial Opportunities

A financial investment that compromises your independent judgment or work at AppleCare is a conflict of interest. The term “financial investment” means stock, options to buy stock, or other ownership interests in a company.

AppleCare’s policy embraces a “rule of reason.” For example, small investments in companies that compete with AppleCare, or small investments by your spouse in his or her employer (when the company competes with AppleCare), may not be a problem.

If your investment or your spouse’s investment in an AppleCare competitor is not small, telling your manager is a key first step. It will ensure your integrity is not questioned and the issue will be resolved to everyone’s satisfaction.

You should not invest in suppliers or companies with whom AppleCare is contemplating a transaction if you will need to recommend or make decisions about products, services or the merits of a transaction with that supplier or company. Also, you must promptly report any situations where companies/ suppliers that you are evaluating or doing business with offer you stock, or include you in an Initial Public Offering.

If you have any questions about whether a situation is a conflict of interest, consult with your manager. Of course, you or your manager may consult the Human Resources department, or the Ethics & Compliance hotline (877) 842-7954.

You also may not directly or indirectly buy, lease or acquire rights to any property or materials if you believe AppleCare also may be interested in the opportunity. You should tell your manager about any business opportunity you become aware of due to your job at AppleCare.



GOVERNMENT CUSTOMERS

It is AppleCare's policy to treat all of our customers, including federal, state and local governments, with the honesty, fairness and quality described in these Principles. We also strive to comply with the procurement laws and regulations put in place to protect the public interest. These laws apply to AppleCare whether work is done under a primary contract or subcontract.

AppleCare employees who work with government officials and contracts must know and comply with applicable laws and regulations. Direct questions about the laws and regulations applicable to working with government customers to your manager.

Employee Education and False Claims

AppleCare policy requires compliance with the requirements of federal and state laws that prohibit the submission of false claims in connection with health care programs, including Medicare and Medicaid. Every AppleCare employee must comply with the following requirements designed to detect and prevent fraud, waste and abuse.

- **Federal False Claims Act:** The federal False Claims Act prohibits knowingly submitting (or causing to be submitted) to the federal government a false or fraudulent claim for payment or approval. It also prohibits knowingly making or using (or causing to be made or used) a false record or statement to secure payment for a false or fraudulent claim paid or approved by a state Medicaid program, the federal government or its agents, such as a carrier or other claims processor. Civil penalties can be imposed on any person or entity that violates the federal False Claims Act, including monetary penalties of \$5,500 to \$11,000 as well as treble damages for each false claim.
- **Federal Program Fraud Civil Remedies:** The Federal Program Fraud Civil Remedies Act of 1986 allows the government to impose civil penalties against any person who makes, submits or presents false, fictitious or fraudulent claims or written statements to designated federal agencies, including the U.S. Department of Health and Human Services, which is the federal agency that oversees the Medicare and Medicaid programs.
- **State False Claims Acts:** Several states have enacted broad false claims laws modeled after the federal False Claims Act that impose civil penalties ranging from \$5,500 to \$11,000 for each action, plus treble damages and reimbursement costs of the action. Other states have enacted laws with provisions limiting false claims to health care fraud that impose civil penalties up to \$10,000 per violation, plus three times the amount of excess payment including interest and reimbursement costs of the civil action, and criminal fines up to \$50,000 and possible imprisonment
- **Whistleblower and Whistleblower Protections:** The federal False Claims Act and some state false claims acts permit private citizens with knowledge of fraud against the U.S. Government or state government to file suit on behalf of the government against the person or business that committed the fraud. The laws also prohibit



retaliation against an employee for investigating, filing or participating in a whistleblower action.

Employees' Responsibilities

AppleCare corporate policies on Detecting Fraud and Abuse require each AppleCare employee to comply with the requirements of these policies. In addition, each employee is required under these policies to report any suspected misconduct, including suspected violations of the Company's policies or procedures or federal or state laws. AppleCare employees can make reports of potential improper activities to their manager, the Human Resources department, the Compliance Officer or anonymous phone calls can be made to the toll-free Ethics & Compliance hotline (877) 842-7954.

AppleCare expressly prohibits retaliation in any form against an individual who, in good faith, reports suspected violations of the Principles of Ethics & Integrity, provides information related to such reports, participates in compliance investigations, or files or participates in a whistleblower action.

Managers Responsibilities

AppleCare managers must inform their employees that AppleCare does not tolerate or condone activities that result in or contribute to the submission of false claims to any federal health care programs, including Medicare and Medicaid. An AppleCare manager must take appropriate action if he or she learns about possible fraudulent or abusive activities.

Corporate Responsibilities

AppleCare's policy on Detecting Fraud and Abuse establishes procedures to detect, investigate eliminate and report fraud and abuse.

AppleCare must educate and train all of their employees on federal and state false claims acts, the federal Program Fraud Civil Remedies Act of 1986 and whistleblower protections available under these laws.

AppleCare makes available to its employees descriptions of the federal and state false claims acts, the federal Program Fraud Civil Remedies Act of 1986 and whistleblower protections available under these laws through the AppleCare employee handbook and the Company intranet. All AppleCare employees are required to complete training on fraud, waste, and abuse prevention after initial hire and then on an annual basis.

Government Investigations and Interviews

AppleCare and its employees must cooperate fully and promptly with government actions looking into possible civil and criminal violations of the law. It is important, however, that during this process AppleCare is able to protect the legal rights of the company and its employees. To do so, employees must promptly refer any questions from the government or requests for information, documents or interviews to the Executive department. Employees who take part in government interviews must tell the truth and give complete, clear answers.



In response to government requests for information, the company will provide complete, factual and correct information. Never hide, destroy or change documents, or lie or make misleading statements to government officials or their representatives. Do not try to cause a fellow employee to fail to provide correct information.

AppleCare will answer government requests for information as required by law. It is important, however, that AppleCare is able to protect the legal rights of the company and its employees when responding to such requests. As a result, employees must refer all government requests for information to the staff who have been assigned responsibility for regulatory compliance. The compliance staff may respond to routine requests that are within the scope of their job responsibilities. All other requests must be referred to the Executive department.



HEALTH, SAFETY & SECURITY

General Health and Safety

AppleCare is committed to providing a safe and healthful workplace for all employees and visitors. You can support this commitment by observing all health and safety rules and laws that apply to your job. You also must promptly report accidents, injuries, or occupational illnesses and unsafe practices or conditions to your manager.

Violence in the Workplace

In line with its policy to provide a safe workplace for employees, AppleCare is committed to maintaining a work environment free from acts or threats of violence. The company will not permit any behavior that puts the safety of its employees, participants, customers, suppliers or others in danger.

Employees may not carry any weapon on the job; onto company work sites; in company vehicles; in personal vehicles while being used for company business; or while attending AppleCare- sponsored activities. Non-employees, except law enforcement officers and specifically contracted armed security agents, are not allowed to carry a weapon onto AppleCare property. Threats or acts of violence or physical intimidation are not allowed.

Employees must promptly report all threats, attempted violence, or actual violence against themselves, other employees, customers or third parties in the AppleCare workplace to their manager or Human Resources.

Drugs and Alcohol

To help promote a safe and healthful environment for employees and provide customers and investors with the quality and productivity they demand, AppleCare requires a drug-free workplace. Employees must not be under the influence of any substance, including alcohol that could prevent them from working safely and effectively. Using, possessing, distributing, manufacturing, transporting, selling or being under the influence of alcohol or an illegal or illicit drug while on duty, on company work sites, or in company vehicles or in personal vehicles used for company business is not allowed. Employees with alcohol or drug problems are encouraged to contact the company sponsored health insurance carrier, Human Resources department, or a qualified healthcare professional.

Employees who are using prescription or nonprescription drugs that may impair their alertness or judgment and as a result put their safety or that of their co-workers, participants, or others in danger, must not continue to perform their jobs and must tell their manager.



MEDIA AND CONTACT AND COMMUNICATION

AppleCare's reputation comes, in part, from the relationships it maintains with the news media. For this reason, it is critical that we present information to the news media in a clear, accurate, positive and professional manner.

Approvals

All news to be sent to local, regional, national, or trade media must be reviewed and approved by the appropriate business leader, public relations department, subject matter experts, and the CEO or their designated representative before it is released.

Media Inquiries

All contacts from the news media should be directed to the COO or CEO. This will make sure the reporter talks to a key subject matter expert and receives the most current information.

Disclosure Information

AppleCare employees must never disclose confidential information that violates the privacy rights of members. Employees must not view any member information other than what they need to do their job.



POLITICAL AND COMMUNITY ACTIVITIES

Community Activities

AppleCare contributes to the economic and social development of the communities where it does business. In addition to creating jobs and providing services, the company encourages employees to be active in their communities.

If you take part in community activities not sponsored by AppleCare, you must make it clear that your views and actions are your own and not those of the company. Also, your activities outside the workplace should not interfere with your work at AppleCare.

If you wish to use company time or property to support charitable, nonpolitical efforts, you must first obtain approval from the Human Resources department.

Political Activities

No employee may contribute on behalf of AppleCare or use AppleCare's name, funds, people, property or services to support political parties or candidates unless allowed by law and approved in advance by AppleCare's CEO.

If you take part in political activities or committees, you must make it clear that your views and actions are your own and not those of the company, unless the company has requested and approved your participation. Your activities outside the workplace should not interfere with your work for AppleCare.

You must not pressure a fellow employee to express a political view that goes against his or her personal view. You also must not pressure a fellow employee to contribute to a political action committee (PAC), political party or candidate, or charity.

U.S. law and the laws of many state and local governments forbid companies from contributing money, goods or services to political candidates, except for administrative support of a company's PAC. The PAC receives voluntary contributions from employees that are then contributed to political parties and candidates. The PAC does not contribute company funds to political parties or candidates. Outside the United States, AppleCare will honor local laws and applicable U.S. laws, including the Foreign Corrupt Practices Act.



PROCUREMENT PRACTICES

AppleCare believes in doing business with suppliers, contractors, agents, sales representatives, and consultants who have ethical business practices. The company will not knowingly use suppliers who violate applicable laws or regulations, including environmental, employment or safety laws.

Obtaining the best overall value for AppleCare should be the basis for procurement decisions.

AppleCare has an Authorization Request process. All requests for new suppliers must be approved by the Finance department. Do not commit or enter into any agreements on behalf of the company unless you have fiscal and signatory approval to do so and your request has been approved in advance by the Finance department.

Personal, family and financial relationships may make it difficult to make objective decisions. If you have a personal or family relationship with, or own an interest in a supplier or potential supplier, you must tell management of the relationship. You must also take steps to make sure decisions affecting these companies are based solely on objective input and judgment. See the Conflicts of Interest section of these Principles for additional guidance regarding these types of situations.



PROVIDER RELATIONSHIPS

AppleCare relies upon and/or maintains a variety of relationships with physicians and other health care providers. These relationships are essential to AppleCare's business and success. AppleCare business units enter into contracts with certain physicians and other health care providers to render services to members. The business units may also arrange for non- contracted physicians and other health care providers to be paid for services provided to members.

All contractual arrangements with physicians and other health care providers must be in writing and in accordance with the Provider Contracting department policies. And, all business relationships with a physician or other health care provider must comply with applicable legal requirements and any established company standards. Specifically, contractors for services under a state Medicaid contract must agree in writing to comply with the requirements of the federal False Claims Act, any applicable state false claims acts, and the Program Fraud Civil Remedies Act of 1986. If an employee is not sure what legal requirements or company standards may apply, the employee should consult his or her manager or contact the Provider Contracting department.



REGULATORY COMPLIANCE AND ACCREDITATION **ORGANIZATIONS**

Regulatory Compliance

AppleCare provides a variety of health care related services and coverage products. These products and services must be provided according to applicable federal, state and local laws. The company is subject to many other laws in addition to health care coverage regulations.

It is AppleCare's goal to provide its employees with the information and education they need to fully understand and comply with all relevant laws and regulations. Employees should promptly report violations or suspected violations of applicable laws to a manager, a member of Senior Management, the Human Resources department, the Compliance Officer or the Ethics & Compliance hotline (877) 842-7954. Retaliation in any form against an individual who, in good faith, reports a suspected violation of this Plan or provides information related to such reports, Company policies, the law or contractual obligations, is prohibited.



SALES & MARKETING

One of AppleCare's goals is to satisfy its customers with high-quality products and services at competitive prices. We must treat customers with honesty, integrity, fairness and respect at all times, and we must make promises only when we are reasonably sure we can keep them.

In our highly competitive marketplace, AppleCare can create a competitive advantage by correctly representing products, services, benefits and prices. If we make promises we can't keep, hard-earned customer trust is lost. We also must not create misleading impressions, omit important facts, or make false claims about our competitors' offerings.

While AppleCare needs to aggressively market and advertise its products and services, we must do so while following "truth in advertising" laws. You must never use illegal or unethical activities to obtain business, including offering bribes or kickbacks.



**Attestation to Abide by AppleCare Principles of Ethics & Integrity -
Your Guide to Business Conduct**

I attest that I have read, understand, and will abide by the AppleCare Principles of Ethics & Integrity - Your Guide to Business Conduct and the AppleCare Compliance Plan (“Principles”).

I understand that it is my obligation to comply with the law, these Principles, and all applicable Company policies and contractual obligations.

I further understand that I have an affirmative duty to report all suspected illegal or unethical conduct, including violations of law, these Principles, Company policies and contractual obligations, or any concerns about accounting, internal controls, auditing matters, or suspected fraud and abuse. The Company maintains a strict non-retaliation policy for good-faith reporting of actual or potential illegal or unethical conduct.

I will carry out my responsibilities for AppleCare in accordance with these Principles, the applicable laws and regulations, and the Company’s policies and contracts.

If I violate these Principles it can result in disciplinary action, up to and including termination of employment or contract.

Additionally, I have no conflict of interests beyond those that I have already discussed with Human Resources.

Should I have questions regarding these topics, I will contact my manager for clarification.

Signature: _____ Date: _____

Print Name: _____

Title: _____

