



ProCare
ADVANTAGE

CODE OF ETHICS

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INTRODUCTION

ProCare Advantage strives to follow principles which promote the highest levels of excellence within our company. One such guiding principle is that of stewardship. This principle, applied to our industry of health insurance, provides a mandate to serve the beneficiaries enrolled in our plans, using the resources we have been provided, with the highest moral and ethical standards. Throughout every level of our organization, we make the commitment to provide our services in this manner.

ProCare's Code of Ethics is the means we use to accomplish this level of excellence, describes the overarching principles and values of our organization. Its purpose is to provide a clear understanding of our commitment to following ethical and legal principles as well as a reference point for guidance and instruction for all our workforce, including employees and contractors. Compliance with the Code is the responsibility of all ProCare Advantage Plan (Plan) workforce members, as well as first tier and downstream entities performing services on behalf of ProCare. The Code outlines expectations of employee conduct in areas where improper activities could damage ProCare's reputation and otherwise result in serious adverse consequences to the Plan.

ProCare maintains certain policy and reference documents to guide its workforce with respect to their day-to-day conduct and performance. For purposes of this Code, "workforce" include all permanent, temporary, full-time, part-time, contractors, and volunteer employees who 1) have primary job duties related to ProCare Advantage's Part C and Part D operations and/or sales; and/or 2) are members of the ProCare Advantage Board of Managers.

As members of the ProCare Advantage workforce, each of us has a personal responsibility to report possible compliance issues and concerns.



Robin Underhill
Chief Executive Officer



Armando Guzman
Executive Director



Nancy Roht
Compliance Officer

LEADER RESPONSIBILITY

We expect our leaders to foster a culture of integrity and transparency. We promote an open-door policy, where it is safe to ask questions and raise concerns without fear of retaliation. **We support our leaders in modeling ethical behavior and holding others to the same standard.** We believe it is important to listen and acknowledge concerns of our team members, and act promptly when a potential violation of law or policy occurs. Don't hesitate to seek support from the ProCare Compliance Officer.

WORKFORCE MEMBER RESPONSIBILITY

Our workforce members are responsible for upholding our high standards when engaging in business and patient care. You are accountable for familiarizing yourself with ProCare Advantage Plan's Code of Ethics and policies and how they apply to you. Should you have questions or concerns, don't hesitate to raise them in a timely manner. You are responsible for completing any training as it is assigned to you.

ProCare Advantage expects all employees to conduct themselves in an ethical manner, and to report all instances of noncompliance and potential fraud, waste, and abuse (FWA) through appropriate mechanisms.

RAISING CONCERNS

ProCare employees, providers, and first tier and downstream entities should feel comfortable bringing forward compliance questions or concerns. As members of the ProCare workforce, we all have a responsibility to promptly raise issues we believe, in good faith, may be a potential or actual violation of law, regulation, FWA concern, or the Code of Ethics. There are a variety of ways to raise concerns:

- To our supervisors, directors, or any member of the management team
- To the ProCare Compliance Officer
- Call the ProCare Ethics Hotline (844) 317-9059 at any time: 24 hours a day, seven days a week
- E-mail your question or concern to compliance@procareadvantageplan.com or
- Mail us at Compliance
ProCare Advantage
P.O. Box 5849
Glen Allen, VA 23058-4440

The hotline is operated by an independent third party. Callers may choose to remain anonymous. ProCare Advantage will protect caller confidentiality to the extent practical during an investigation, and will work to limit sharing relevant information related to an investigation only with those individuals with a legitimate business need to know.

We impartially follow up on questions, concerns, and reporting raised in good faith. Individuals should feel comfortable coming forward or cooperating with investigations, without fear of retaliation. If you believe you've been subject to retaliation, don't hesitate to contact the Ethics Hotline or a manager that has not been involved.

ProCare Advantage does not tolerate fraudulent, FWA, or other dishonest behavior. We will investigate issues raised using the channels listed above, such as the hotline, management, and the Compliance Officer, and implement corrective action as appropriate. ProCare is prohibited by law from retaliating in any way against an individual who, in good faith, reports a perceived problem, concern, or suspected FWA issue. We will not tolerate punitive action against an employee who reports such information.

As a condition of employment, all new employees will receive the Code of Ethics and the required compliance training within the first 90 days of hire for prompt completion. Workforce members will comply with all the elements in their day-to-day activities. Existing ProCare Advantage employees will receive the Code annually or upon revisions.

An employee's actions are significant indications of their judgment and competence. An employee's actions and compliance with the Code of Ethics constitutes an important element of annual performance evaluations, consideration of position assignments, and promotion. An individual's disregard of ProCare's Code of Ethics will be addressed in accordance with the Disciplinary Standards policy.

SUPPORT ETHICAL BUSINESS PRACTICES

ProCare's reputation is built upon the principles of fair dealing and ethical conduct of each of us. We uphold ProCare's reputation for integrity and excellence through careful observance of both the spirit and letter of all applicable laws and regulations. ProCare's success is dependent upon earning our customers' trust, and we are dedicated to preserving that trust. Every employee, provider, and workforce member is expected to conduct themselves in a way that will merit the continued trust and confidence of our Plan members.

ProCare Advantage complies with all applicable laws and regulations, and holds its workforce to the same standard. It is important that claims accurately reflect the services provided, that claims filed timely are paid correctly, claims we receive are supported by documentation and medical necessity, and comply with applicable federal and state laws and regulations. If we identify an error, we query the provider or raise it with our supervisor and document the concern when it is discovered. **Each of us plays a part in providing or supporting necessary, quality care that is billed and paid correctly.** We abide by all federal and state regulations. Remember:

- Avoid engaging in any illegal, dishonest, or unethical conduct.

- You should promptly raise concerns of potential FWA to a manager or the ProCare Compliance Officer. You are protected by our Non-Retaliation policy.

ACCURATE RECORD KEEPING

As a member of the ProCare's workforce, we have a duty to maintain all medical and business records in accordance with applicable laws. We have a responsibility not to alter or falsify information on any record or document. We help hold one another accountable for developing and maintaining the most accurate records possible. Remember, don't sign your name unless you know the statement is true. Don't sign other people's names to records and documents, or share passwords.

Our staff should never include false, fraudulent, deceptive or misleading information in ProCare Advantage Plan's records.

In general, the use of good judgment, based on high ethical principles, will guide each employee with respect to standards of acceptable conduct. If you encounter a situation in which it is difficult to determine the proper course of action, discuss the matter openly with your supervisor, the Compliance Officer, and/or Human Resources staff. Every individual has a duty to raise concerns and questions in good faith. **If you see something, say something.**

CONFLICTS OF INTEREST

Because we want to promote a culture of transparency, we inform our managers if we are involved in a situation that is, or may appear to be, a conflict of interest. A conflict of interest may be a situation involving financial interest or activity that may compromise your ability to act impartially and in the best interest of ProCare. Examples of potential conflicts of interest that should be discussed with our supervisors include, but are not limited to:

- If you or a family member work for, or have a financial interest in, a competing organization;
- benefitting personally from opportunities available to you as a result of your relationship with ProCare or Cantex; or
- serving as a Director, consultant, partner, or employee of an organization doing business with ProCare or Cantex.

Be sure to discuss the situation with your supervisor. If you are in a position that has the appearance of a conflict, it is best to withdraw or recuse yourself from that decision.

Transactions with third parties shall be conducted within a framework established and controlled by the executive level of ProCare Advantage. Business dealings with outside firms should not result in unusual gains for such organizations or individuals. "Unusual gains" may include, but are not limited to, bribes, product bonuses, special fringe benefits, unusual price

breaks, special consideration, and other advantages that ultimately benefit either party, including its employees, or both.

You should know that simply having a relationship with an outside entity, whether an individual or a firm, does not in itself create a “presumption of guilt.” But it is important to tell your manager or the Compliance Officer as soon as possible so ProCare can ensure guardrails are in place to safeguard all parties. This is specifically a concern when a current or potential purchase, contract, or lease arrangement is affected.

Exercising objectivity, good judgment, and protecting our reputation are core values at ProCare Advantage. We don’t make decisions for personal gain or accept gifts, entertainment or business meals that will influence our decisions. Keep in mind, a gift is defined as anything of value. Any vendor perks provided or received should be reasonable and nominal in value. Contact Ethics and Compliance for more information.

Permitted Gifts, Entertainment, and Meals

- Occasional gifts purchased by ProCare Advantage for its workforce and employees. Please note, gifts over a certain threshold are the employee’s taxable income. Contact payroll for the current IRS guidance.
- ProCare may purchase a nominal reward or incentive for an enrollee as part of a Reward and Incentive (RI) Program. Such rewards or incentives may not be in the form of cash or monetary rebates, including reduced cost-sharing or premiums, and must be tangible items and comply with the CMS Medicare Managed Care Manual.
- CMS Medicare Communication and Marketing Guidelines allow plans to offer gifts of nominal value to beneficiaries. The retail value of the item may not exceed \$15 per instance or \$75 in total per year. These items may not be cash, monetary rebates, or other cash equivalents. See 85 Fed. Reg. 77,684, 77,789-90 (Dec. 2, 2020), 81 Fed. Reg. 88,368, 88,393 n. 19 (Dec. 7, 2016) for more information.
- Occasional business meals purchased by, for, or received from a vendor or customer. The purpose of the meal should be to discuss ProCare Advantage Plan business.
- Occasional business entertainment purchase by or for a vendor or customer, or received from a vendor or customer, as long as the cost paid per employee does not exceed \$100 per vendor or customer in total per year, and they attend the event with the employee to discuss business. The employee should obtain approval from his/her supervisor prior to attending the event.

Remember, we never provide or accept cash or cash equivalents from third parties including, but not limited to, traveler’s checks, money orders, stock, negotiable instruments, honorariums. Perishable items such as food should be shared among ProCare staff members.

Gifts, Improper Payments, and Entertainment that are Not Permitted

No employee of ProCare Advantage or any Network or Representative acting on its behalf shall:

- ask for or accept gifts from beneficiaries or their family members.
- purchase, give, or receive gifts and/or meals from US or foreign government officials or their agents, a political party, or any candidate for political office.

We comply with all federal and state health care fraud and abuse laws and regulations, including the Anti-Kickback Statute and the False Claims Act.

We never offer, give, or receive something of value in exchange for, or in hopes of receiving, referrals or the generation of business. We do not offer, give or accept bribes or kickbacks. We compensate and determine our contract rates based on fair market value, not the volume or value of referrals or generation of business.

ProCare will employ or contract with reputable, qualified, appropriately licensed, certified, or credentialed individuals or firms, as appropriate. Consultants, agents, or representatives retained in relation to the provision of goods or services to the federal government must agree to comply with all laws, regulations, and ProCare Advantage policies governing employee conduct. It is your responsibility to alert the Compliance Officer if you are sanctioned or excluded by a state or federally funded health care program. ProCare conducts regular background and/or exclusion checks to ensure it is not doing business with entities excluded from participation in Medicare and Medicaid.

POLITICAL CONTRIBUTIONS

ProCare Advantage will not make any contribution to any political party or to any candidate for political office in support of such candidacy except as provided in the Code and as permitted by law.

In the United States, federal law strictly controls corporate involvement in the federal political process. Generally, federal law provides that no corporation may contribute anything of value to any political party or candidate in connection with any federal election.

While similar laws apply in some states and their political subdivisions, in many jurisdictions in the United States, corporate contributions to candidates and political parties in connection with state and local election campaigns are lawful.

The Code of Ethics is not intended to prevent the communication of ProCare Advantage views to legislators, governmental agencies, or to the general public with respect to existing or proposed legislation or governmental policies or practices affecting business operations. Moreover, reasonable costs incurred by ProCare Advantage to establish or administer political action committees or activities organized to solicit voluntary political contributions from individual employees are not regarded as contributions to political parties or candidates, where ProCare Advantage may lawfully incur such costs.

COOPERATING WITH INQUIRIES AND INVESTIGATIONS

As a Plan, ProCare Advantage is subject to various federal and state regulations. On occasion we may encounter officials responsible for regulating aspects of healthcare or business practices. **We cooperate with government inquiries and investigations.** If you receive a subpoena, inquiry, or other document from any government agency regarding our business or beneficiaries, whether at home or at work, contact the ProCare Compliance Officer immediately. If you become aware of an imminent or ongoing investigation or audit, you should retain all documents in your control relating to the matter.

Ethics and Compliance is available to provide assistance, support and answer questions related to the Code of Ethics and other compliance and privacy concerns. Don't hesitate to contact the Compliance Officer at any time.

Nancy Roht | Medicare Compliance Officer

Ethics Hotline Phone (844) 317-9059 | 24/7

TRAINING IN FWA

ProCare Advantage is committed to the responsible stewardship of our resources, and works to detect, prevent, and correct FWA. To that end, any individual who is aware of or suspects FWA of our resources in any departmental area, by any provider, or with any entity ProCare contracts with, should contact the ProCare Compliance Officer.

Per CMS requirements, all employees and governing body members are required to complete assigned FWA training within 90 calendar days of initial hiring or appointment, and annually as assigned thereafter.

TRAINING IN COMPLIANCE AND PRIVACY

General compliance and privacy training will address preventing, detecting, and correcting potential areas of noncompliance, and reporting channels. Moreover, such training efforts highlight ProCare Advantage's non-retaliation policy for compliance-related questions, reports of potential matters, and FWA.

PROTECT PATIENT AND CONFIDENTIAL INFORMATION

Each member of the ProCare team has a duty to protect and respect patient and other sensitive and proprietary information. We treat the privacy of our beneficiaries, partners, and clients with care, and will not reveal or discuss patient-related information except with health care personnel involved in their care, payers and others authorized by the patient or his/her authorized representative.

We use patient information only as necessary to perform our job. Patient information should only be shared only with those people that “need to know,” even among family and friends. Here are some helpful guidelines to keep in mind:

- Pick up all PHI and sensitive information promptly off printers and scanners. Also, if you see sensitive information on the shared machines, please turn the pages over or place them in a folder until the owner is able to retrieve the pages.
- Avoid discussing patient-specific information in public areas.
- Store sensitive information according to ProCare policies.
- Destroy sensitive information securely by shredding or placing in locked, confidential bins.
- Access only the patient information you need to know to perform work for treatment, payment or to conduct ProCare Advantage Plan operations.
- If you are texting on a mobile device, be sure and do so in the Teams app. Simply using your phone’s regular text function won’t encrypt our beneficiary or sensitive information!

ProCare workforce members and contractors work in a variety of locations. Thus, much of our information is created, communicated and stored electronically. To help keep our information safe, you are required to:

- Include “**#secure**” in the subject line of emails containing PHI or other sensitive information if it is sent to an outside party.
- Encrypt and secure mobile devices which contain confidential information. Examples include but are not limited to laptops, flash drives, external hard drives.
- **Keep your passwords confidential.**
- Log off or lock your computer or workstation when you walk away or are finished working.
- Immediately report a lost or stolen device, phishing scams and other security concerns.

All employees and governing body members must complete general compliance training within 90 days of initial hiring or appointment, and annually upon assignment thereafter.

VIOLATIONS OF THE CODE OF ETHICS

Abiding by the principles set forth in ProCare Advantage Plan’s Code of Ethics is a condition of employment. Violations are evaluated and should be managed consistently with regard to sanctions such as disciplinary action up to and including termination.

Workforce members have a duty to raise issues in good faith regarding potential violations of the Code of Ethics; individuals involved in an incident or deliberately withholding relevant and material information concerning a potential compliance, ethics, or FWA matter may be subject to sanctions under ProCare’s policies and procedures.

PROCARE ADVANTAGE COMPLIANCE AND HOTLINE CONTACT INFORMATION

ProCare Advantage Compliance Officer	Nancy Roht nroht@procareadvantageplan.com
Phone	(913) 207-4329
Ethics Hotline	(844) 317-9059
Fax	(800) 335-0270
E-mail	compliance@procareadvantageplan.com
Mailing Address	Compliance ProCare Advantage P.O. Box 5849 Glen Allen, VA 23058-4440