

## **Code of Conduct**

### **UPMC Insurance Services Division Vendors**

UPMC Insurance Services Division is committed to adhering to ethical business practices and complying with federal, state, and local laws and regulations and requires its vendors to act in an ethical manner and to uphold the standards of conduct outlined by the UPMC Insurance Services Division Code of Conduct, (“Code”) which embodies our commitment to professional and legal standards.

Honesty and integrity are core principles of our organization. The purpose of the Code is to develop and continuously improve processes that promote honest, ethical, safe and legal practices in all of our day-to-day operations.

Our Code supports our mission and helps us to have a clear understanding of the business, professional and personal ethics that are expected of us in the workplace. It applies equally to everyone, whether serving as a board member, serving as a staff member, or doing business with UPMC Insurance Services Division.

UPMC Insurance Services Division recognizes six cardinal principles as the basis for effective performance under this Code.

1. **Commitment to Ethics & Compliance...Our Responsibilities**
  - Personal accountability for our decisions and actions.
  - Understand the laws, policies, and contractual obligations that apply to specific areas of operations.
  - Never misuse our authority whether for personal interests or to the harm of UPMC Insurance Services Division.
  - Help create a culture that promotes honest and integrity.
  - Report, in good faith, violations and/or unethical behavior.
2. **Reporting Misconduct and Compliance HelpLine**
  - We do not tolerate retaliation against a vendor for reporting a perceived or potential violation of the Code, policies, procedures or laws and regulations, or for participation in an investigation of an alleged violation that has been reported in good faith.
  - The Corporate Compliance Office coordinates the prompt and thorough investigation of all suspected violations and good faith reports. All investigations will be conducted following established procedures for confidentiality. It is the responsibility of everyone to cooperate with investigations.
  - Anyone who makes a false accusation is in violation of UPMC Insurance Services Division policy and the Code. Offenders will be subject to disciplinary action.
  - To report a regulatory violation or ethics issue, contact the UPMC Compliance Helpline at 1-877-983-8442.
3. **Quality of Care, Member Rights, Access & Availability**
  - UPMC Insurance Services Division respects Members’ rights, as detailed in our Member Handbooks, and assures that covered services are accessible to our Members.
4. **Compliance with Laws and Regulations**
  - We are committed to operate in accordance with all applicable laws and regulations, to conduct business ethically and honestly, and to act in a manner that improves our standing in the community.
5. **Conflicts of Interest**
  - UPMC Insurance Services Division vendors should not engage in any activity that may conflict with the ethical interests of UPMC Insurance Services Division..
  - We will not contract for services with vendors that we, or members of our immediate family, have a financial relationship with, unless the relationship is known and approved by senior management.
  - In our dealings with vendors, government agencies or customers, we will always act in the best interest of UPMC Insurance Services Division.
6. **Confidentiality and Privacy**
  - Vendors may be exposed to confidential or proprietary information. This includes, but is not limited to, member information, provider information, commercially sensitive information and financial information about UPMC Insurance Services Division. Vendors should be committed to protecting confidential information and individuals’ right to privacy in accordance with applicable laws, regulations and contracted terms.

UPMC Insurance Services Division expects its’ vendors to conduct their business in a manner consistent with these principles, and to follow workplace standards that adhere to our Code.

Resources are available to answer specific questions and concerns. Our Chief Compliance Officer, Daniel Vukmer, Esq. and/or the Senior Director of Compliance are available during normal business hours at 412-454-5204.