

SUPPLIER CODE OF CONDUCT

C08 – Compliance Policies & Procedures

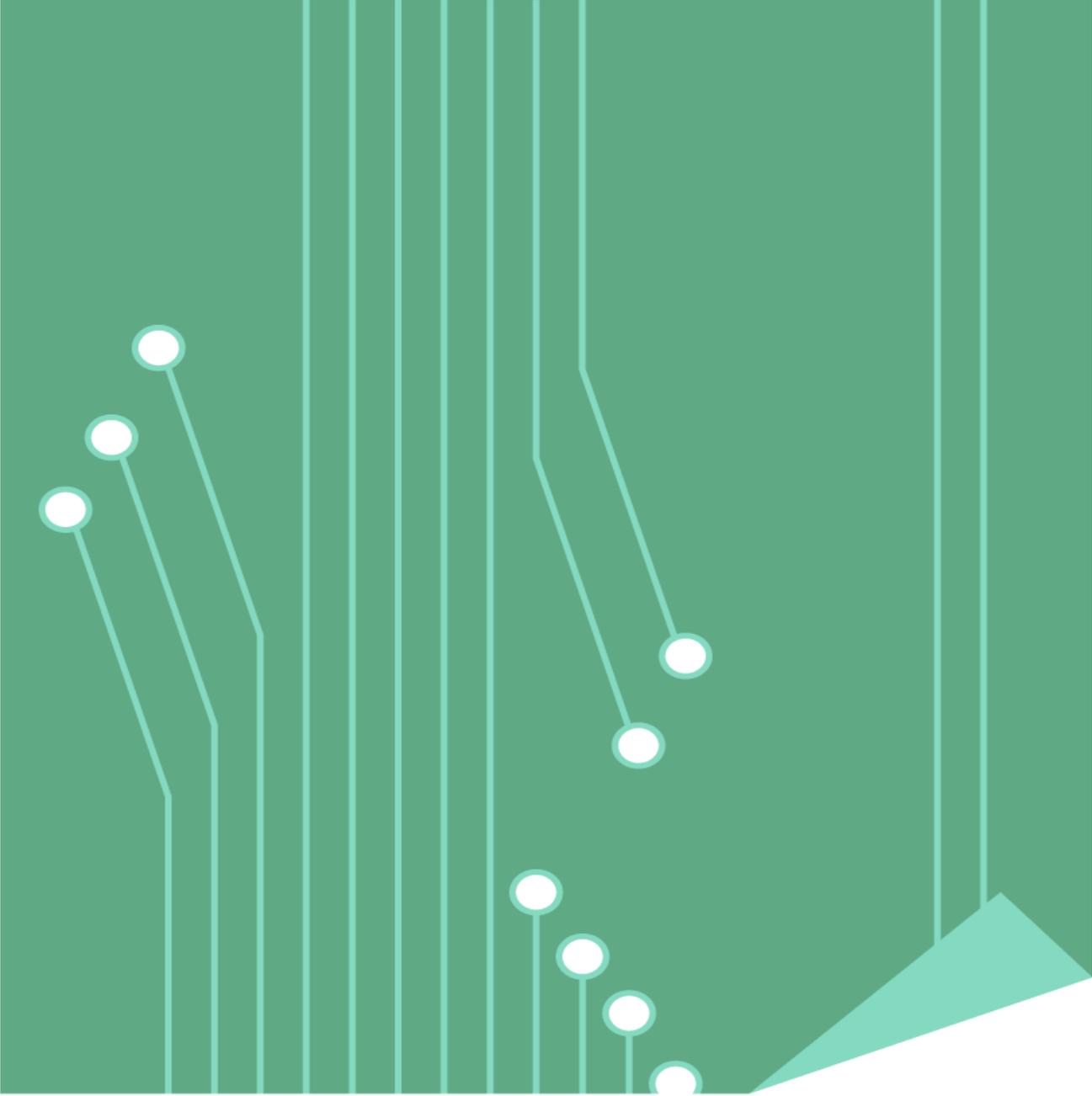


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Supplier Code of Conduct

Policy Overview

Effective Date	06/15/2017
Revision Date	10/16/2018
Approved By	SVP Legal & Regulatory Affairs, Chief Compliance Officer
Summary	<p>Acting ethically, with the highest integrity and in compliance with the law, is as important as any aspect of Availity’s business. How you conduct yourself reflects on you and Availity. That’s why Availity expects and requires that Suppliers comply with all applicable laws and regulations in carrying out their responsibilities as a Supplier.</p> <p>Laws do not cover all situations, and sometimes laws permit actions that do not promote the level of honesty, fairness, or integrity that Availity promotes. Some things that are legal may still be unethical. Availity expects that you will:</p> <ul style="list-style-type: none"> a. Promote the safety and welfare of employees and our customers; b. Encourage a cooperative and professional work environment; c. Protect personal rights and corporate property; and d. Demonstrate the highest standard of integrity and ethical behavior.
Purpose	The purpose of this policy is to outline the expectation of conduct by each of Availity’s Suppliers. This Supplier Code of Conduct is designed to support Availity’s reputation as an industry leader that acts with the highest integrity and complies with all applicable law and regulations.
Definitions	Supplier – A person or company offering goods or services for or on behalf of Availity and its subsidiaries and affiliates.
Goal	To outline the conduct expected by each Supplier and outline the proper ways to report any non-compliance of the law, this policy, or any other general issues.
Regulatory Citations	HIPAA, U.S. Foreign Corrupt Practices Act; 18 U.S.C. §1001
Other Policies Referenced or Affected	Availity Code of Conduct & Ethics, FCPA Policy, Information Security Standards



Policy Content, Procedures and Responsibilities

Availity Code of Conduct for Suppliers

The Availity Code of Conduct for Suppliers (the “Supplier Code”) applies to all Suppliers that provide goods or services for or on behalf of Availity and its subsidiaries and affiliates. The Supplier Code sets forth our expectations for how our Suppliers conduct themselves and their business. All Availity Suppliers must ensure their personnel, agents, and subcontractors comply with the Supplier Code.

Acting ethically, with the highest integrity and in compliance with the law, is as important as any aspect of Availity’s business. How you conduct yourself reflects on you and Availity. That’s why Availity expects and requires that Suppliers comply with all applicable laws and regulations in carrying out their responsibilities as a Supplier.

Laws do not cover all situations, and sometimes laws permit actions that do not promote the level of honesty, fairness, or integrity that Availity promotes. Some things that are legal may still be unethical. Availity expects that you will:

- a. Promote the safety and welfare of employees and our customers;
- b. Encourage a cooperative and professional work environment;
- c. Protect personal rights and corporate property; and
- d. Demonstrate the highest standard of integrity and ethical behavior.

1. Workplace Standards and Practices

Health and Safety

All Suppliers are expected to conduct themselves in a manner that promotes the safety and welfare of employees, encourages a cooperative, courteous, and productive environment, and protects personal rights and corporate property.

Workplace Violence

Any act of violence is not tolerated. We require you to conduct yourself with common courtesy and engage in safe and appropriate behavior. Any act of physical violence is considered unacceptable behavior and violates Availity’s company policy. Any physical altercations may result in termination of Availity’s relationship with such Supplier.

If you suspect any incidents, you must immediately report them to Availity through your project manager, Human Resources, Compliance, the Legal Department, or the Compliance and Ethics Helpline.

Harassment

Availity does not tolerate harassment of our job applicants, contractors or employees by anyone including but not limited to Suppliers or other third parties. Any form of harassment on the basis of race, religious creed, color, age, sex, sexual orientation, gender identity, gender expression, genetic information, national origin, religion, marital status, medical condition, disability, military service, pregnancy, childbirth and related medical conditions, or any other classification protected by federal,

state, or local laws and ordinances is a violation of this policy and will be treated as a disciplinary matter. Availity is committed to a workplace free of any harassment.

2. Business Practices

Conflicts of Interest

Availity Suppliers must act in the best interests of Availity and must have no relationships, financial or otherwise, with any Availity employee or contractor that might conflict or appear to conflict with the Suppliers' duty to act in Availity's best interest.

If a Supplier's employee has a family or other personal relationship with an Availity employee, or if a Supplier has any business or other relationship with an Availity employee, **the Supplier must disclose this fact to Availity Compliance** and discuss whether there might be a conflict of interest to resolve. It is not possible to list every type of conflict of interest, however, when in doubt the Supplier should timely notify Availity with the facts of the situation so Availity can mitigate or resolve the conflict.

Gifts, Gratuities, and Kickbacks

While doing business with Availity, Suppliers are prohibited from exchanging gifts or gratuities with Availity employees beyond common business courtesies of nominal value, and gifts or items of any value must never be offered to or accepted from government employees.

Under no circumstances is a Supplier allowed to accept or give kickbacks while performing services for or on behalf of Availity. A kickback means to willfully offer, receive, request or pay anything of value, even nominal value, in order to induce or reward referrals of business including goods or services.

While doing business with Availity, Suppliers may not offer or accept any gifts of cash or cash equivalents (i.e. gift cards) regardless of the amount from any source, including Availity employees.

Record Retention

In addition to any specific obligations regarding Availity records and files that may exist in the Suppliers written agreement with Availity, Suppliers must maintain accurate and complete records of all matters related to its business with Availity. In addition, all records must be stored for the period of time required by the Availity Records Retention Schedule or as required by law.

Legal and Regulatory Compliance

Availity Suppliers shall conduct their business in full compliance with all applicable laws and regulations while conducting business with and/or on behalf of Availity. In addition to any specific obligations under the Supplier's agreement with Availity, all Suppliers shall, without limitation:

- a. Comply with all applicable statutory and regulatory requirements for government contracts entered into by Availity and for which Supplier may be providing goods or services, directly or indirectly, in connection with such government contract, including False Statements Act, federal anti-kickback statutes and the like.
- b. Conduct business in full compliance with antitrust and competition laws.
- c. Be honest and forthcoming in communications with and disclosures to regulatory agency representatives and government officials.
- d. Comply with the anti-corruption laws of the countries in which they do business, including the U.S. Foreign Corrupt Practices Act, and not make any direct or indirect payments or promises

of payments to foreign government officials for the purpose of inducing any individual to misuse his/her position to retain service for or provide goods to Availity.

Fair Competition

Availity is committed to fair competition and does not engage in practices that illegally restrain trade or reduce competition. All Availity business activities must comply with federal and state antitrust laws that encourage competition and prohibit certain activities limiting competition. Additionally, many of the activities that violate federal or state antitrust laws may also violate federal and state unfair trade practice, trade secret, and procurement laws and regulations.

Reporting Violations

All Availity Suppliers are responsible for promptly reporting actual or suspected ethics, compliance, and/or privacy issues involving Availity or any of its subsidiary or affiliated entities or agents to the manager assigning their work or to the Compliance team. The Compliance department provides various reporting mechanism to submit reports to. Compliance, privacy, and/or ethics reports can be made using one of the following methods:

1. Call the anonymous Compliance & Ethics Helpline from the United States at 1-800-826-6762
2. Call the anonymous Compliance & Ethics Helpline from India at 000-800-100-1708
3. Send an email to PrivacyOffice@Availity.com
4. Send a letter to the following address:
Availity Chief Compliance Officer
5555 Gate Parkway
Suite 110
Jacksonville, FL 32256

Bribery and Corruption

Availity prohibits any form of bribery or corrupt payments. When working on Availity's behalf or on our business, Suppliers are required to comply with all applicable U.S. and local in-country anti-bribery laws, such as the U.S. Foreign Corrupt Practices Act, the Travel Act and similar laws in foreign jurisdictions.

Suppliers must not, directly or indirectly, make or offer bribes, kickbacks, or other payments of money or anything of value to anyone, including officials, employees, or representatives of any government, company, or public or international organization, or to any other third party, for the purpose of wrongfully obtaining, retaining or directing our business. This includes giving money or anything of value to any third party where there is reason to believe it will be passed on to anyone involved in the decision making process for the purpose of influencing the decision.

If a Supplier is aware of actual or suspected bribery or corrupt payments, the Supplier must notify the Availity Compliance department via one of our reporting methods outlined below:

1. Call the anonymous Compliance & Ethics Helpline from the United States at 1-800-826-6762
2. Call the anonymous Compliance & Ethics Helpline from India at 000-800-100-1708
3. Send an email to PrivacyOffice@Availity.com, or
4. Report the issue in writing to your Availity Project Manager

Alcohol and Drug-free Workplace

Availity promotes a safe and healthy work environment free from drugs and drug use in compliance with the Drug-Free Workplace Act of 1988. Availity policy prohibits the use, possession, transportation, promotion or sale of illegal drugs or drug paraphernalia on or off the job. Furthermore, Availity prohibits any Supplier from reporting to work, representing the Company or traveling during working hours, on behalf of Availity, while under the influence of alcohol or any illegal or controlled substances, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the Supplier to report to work. However, to the extent permitted by and in accordance with applicable law, this exception does not extend any right to report to work or provide services to or on behalf of Availity, under the influence of medical marijuana or to use medical marijuana as a defense to a policy violation or a positive drug test, to the extent you are subject to any drug testing requirement.

3. Privacy and Security Requirements

Privacy

Suppliers, while completing work for or on behalf of Availity, have a responsibility to protect the confidentiality of the Protected Health Information (PHI), Sensitive Personal Information, and other proprietary and confidential information it collects and/or views. Suppliers that provide a service to or on behalf of Availity which requires the use and/or disclosure of PHI shall be deemed Business Associates, in accordance with the Health Insurance Portability and Accountability Act of 1996, and shall enter into a Business Associate Agreement with Availity.

Proprietary and Other Confidential Information

In addition to PHI, Suppliers may have exposure to information that is not PHI, but is confidential and/or proprietary to Availity. Availity has a variety of information assets that are of great value to our competitiveness and success as a leader in our industry. They include valuable confidential and proprietary information, material non-public information, and information relating to our clients. Suppliers must protect all confidential and proprietary information gained from Availity against inappropriate access and disclosure at all times. Misappropriation of Availity confidential and proprietary information may constitute theft of Availity trade secrets and/or violation of unfair competition laws.

Revision History

Date	Updated By	Description
03/16/2017	Erika Ables, Sr. Compliance Analyst	Creation
06/15/2017	Karin Lindgren, SVP Legal & Regulatory Affairs, Chief Privacy Officer	Approved
6/11/2018	Erika Ables, Manager, Compliance & Ethics	Reviewed with no changes

10/16/2018

Erika Ables, Erika Ables, Manager,
Compliance & Ethics

Updated Company address