



## Advocate Health Advisor's Code of Ethics and Business Conduct

### **Statement of Our Core Values**

#### **Company Vision**

Working together to actively improve the health and quality of life for older Americans, families, and communities by moving from a focus on sickness and illness to one based on prevention and well-being; which results in lives saved, misery avoided, and cost eliminated.

#### **Values**

- Trust
- Loyalty
- Competence & Proficiency
- Hard Work/Motivation
- Credibility

#### **Mission**

Advocate Health Advisors provides an unparalleled level of customized support and appreciation to our agents and agencies by leveraging our track record of success, best practices, and national partnerships and infrastructure. We help our agents succeed before, during, and after the sale by providing them access to quality products that promote consumer health and well-being. We operate in the United States and Commonwealth of Puerto Rico (Advocate Health Advisors of Puerto Rico, LLC).

#### **Build Trust and Credibility**

The success of our business is dependent on the trust and confidence we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for Advocate Health Advisors? Will it help create a working environment in which Advocate Health Advisors can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

## **Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. Advocate Health Advisors is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Advocate Health Advisors is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to Human Resources.

## **Create a Culture of Open and Honest Communication**

At Advocate Health Advisors everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Advocate Health Advisors will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

## **For your information, Advocate Health Advisor's whistleblower policy is as follows:**

Employees are encouraged, in the first instance, to address such issues with their managers or the HR Specialist, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, Advocate Health Advisors' CEO does operate with an open-door policy.

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Advocate Health Advisors, we want the ethics dialogue to become a natural part of daily work.

## **Uphold the Law**

Advocate Health Advisor's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Advocate Health Advisors' policy, we

should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

### **Competition**

We are dedicated to ethical, fair and vigorous competition. We will sell Advocate Health Advisor's products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitor's. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for Advocate Health Advisors or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

### **Proprietary Information**

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

### **Selective Disclosure**

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material non-public information with respect to Advocate Health Advisors, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material non-public information.

### **Requirement to Record Beneficiary Calls and Use of TPMO Disclaimer:**

Beginning October 1, 2022, telephone and virtual interactions with Medicare beneficiaries are required to be recorded in their entirety. The types of calls to be recorded include chain of enrollment activities with Medicare Advantage (MA, MA-PD) and Prescription Drug Plan (PDP) members and prospects including lead calls, collecting SOAs, sales calls/presentations, collecting medication and pharmacy information, telephone enrollments, and verification calls, or any other call made post enrollment to confirm understanding and intent to enroll. This is not an all-inclusive list. Advocate Health has a recording solution our agents can use. Agents may choose to record using a different solution. Regardless of the solution used, all agents must strictly adhere to the requirement, be able to produce the call recording upon request and keep each recording for a minimum of 10 years in a HIPAA compliant format.

Third Party Marketing Organizations (TPMO) are also responsible for reading a disclaimer when selling MA, MA-PD and PDP plans. "We do not offer every plan available in your area. Currently we represent [insert number of organizations] organizations which offer [insert number of plans] products in your area. Please contact Medicare.gov, 1-800-MEDICARE, or your local State Health Insurance Program (SHIP) to get information on all of your options."  
Or

“Currently we represent [insert number of organizations] organizations which offer [insert number of plans] products in your area. You can always contact Medicare.gov, 1-800-MEDICARE, or your local State Health Insurance Program (SHIP) for help with plan choices.”

This disclaimer must be:

- Verbally conveyed within the first minute of a sales phone call.
- Electronically conveyed when communicating sales related content with a beneficiary through email, online chat, or other electronic means of communication.
- Prominently displayed on websites.
- On all marketing materials, in print (12-point font) and television advertisements and radio ads.

Advocate Health expects all employees and agents to follow all appropriate guidelines and laws pertaining to marketing MA, MA-PD and PDP plans and failure to do so will result in disciplinary action which will vary based on severity, frequency and other factors, and could include coaching, auditing, monitoring, suspension and/or termination.

### **Health and Safety**

Advocate Health Advisors is dedicated to maintaining a healthy environment. A safety manual has been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please contact the HR department.

### **Avoid Conflicts of Interest**

#### **Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Advocate Health Advisors may conflict with our own personal or family interests. We owe a duty to Advocate Health Advisors to advance its legitimate interests when the opportunity to do so arises. We must never use Advocate Health Advisors' property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Advocate Health Advisors.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Advocate Health Advisors.
2. Hiring or supervising family members or other related persons.

3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any Advocate Health Advisors' transaction.
6. Placing company business with a firm owned or controlled by an Advocate Health Advisor's employee or his or her family, which could potentially cause a conflict.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier.
8. Avoiding conflicts of interest includes avoiding posting inappropriate material to social media, including but not limited to X (formerly Twitter), Snapchat, Instagram or Facebook, blogs or other such sites. Inappropriate material includes sharing, discussing, posting or disclosing restricted information such as PHI, member information, carrier or company proprietary information, or comments that disparage carriers or Advocate Health. Any opinions expressed should state they are the views of the employee and are not the views of Advocate Health Advisors or that of a carrier without strict prior approval.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict-of-interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

### **Gifts, Gratuities and Business Courtesies**

Advocate Health Advisors is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Advocate Health Advisor's was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Advocate Health Advisor's does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Advocate Health Advisors or customers, or would cause embarrassment or reflect negatively on Advocate Health Advisor's reputation.

### **Accepting Business Courtesies**

Most business courtesies offered to us in the course of our employment are offered because of our positions at Advocate Health Advisors. We should not feel any obligation to accept and keep a business courtesy. Although we may not use our position at Advocate Health Advisors to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Advocate Health Advisor's maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Advocate Health Advisors is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Advocate Health Advisor's business.

### **Meals, Refreshments and Entertainment**

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

### **Gifts**

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Advocate Health Advisors does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

### **Offering Business Courtesies**

Any employee who offers a business courtesy must ensure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Advocate Health Advisors. An employee may never use personal funds or resources to

do something that cannot be done with Advocate Health Advisor's resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide non-monetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Advocate Health Advisors.

### **Set Metrics and Report Results Accurately**

#### **Accurate Public Disclosures**

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

#### **Corporate Recordkeeping**

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Advocate Health Advisor's policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Advocate Health Advisors and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Advocate Health Advisor's books, records, processes or internal controls.

### **Promote Substance Over Form**

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At Advocate Health Advisors, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Advocate Health Advisors is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although Advocate Health Advisor's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

Advocate Health Advisors takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

## **Be Ethical and Loyal**

### **Confidential and Proprietary Information**

Integral to Advocate Health Advisor's business success is our protection of confidential company information, as well as non-public information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or non-public information about other companies, including current or potential supplier and vendors. We will not disclose confidential and non-public information without a valid business purpose and proper authorization.

### **Use of Company Resources**

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Advocate Health Advisors are trusted to behave responsibly and use good judgment to conserve company resources. Managers are

responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Advocate Health Advisor's network and our fellow employees, Advocate Health Advisors reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Advocate Health Advisor's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

**Questions about the proper use of company resources should be directed to your manager.**

### **Media Inquiries**

Advocate Health Advisors is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Marketing Manager. No one may issue a press release or speak on behalf of Advocate Health without first consulting with the Marketing Manager.

### **Social Media/Networking:**

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Remember that the internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about Advocate Health or our business partners, fellow associates, members, customers, suppliers, or people working on behalf of Advocate Health or competitors.

### **Post only appropriate and respectful content.**

- Maintain the confidentiality of Advocate Health Advisors trade secrets and private or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may buy or sell stocks or securities. Such online

conduct may also violate the Insider Trading Policy.

- Do not create a link from your blog, website or other social networking site to an Advocate Health Advisors website without identifying yourself as an Advocate Health associate.
- Express only your personal opinions. Never represent yourself as a spokesperson for Advocate Health Advisors. If Advocate Health is a subject of the content you are creating, be clear and open about the fact that you are an associate and make it clear that your views do not represent those of Advocate Health Advisors, fellow associates, members, customers, suppliers or people working on behalf of Advocate Health. If you do publish a blog or post online related to the work you do or subjects associated with Advocate Health Advisors, make it clear that you are not speaking on behalf of Advocate Health. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Advocate Health Advisors."

### **Do the Right Thing**

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Advocate Health Advisor's guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

### **Prohibited Marketing Activities**

Producer acknowledges that certain marketing activities are prohibited by Medicare Program Requirements. The following description of prohibited marketing activities is not exhaustive and is subject to change based on CMS instructions or other changes in Medicare Program Requirements. Additionally, Advocate Health reserves the right to prohibit any marketing activities in its discretion and to adopt standards or practices that may be more rigorous than Medicare Program Requirements. Producer agrees that it shall not (i) conduct door-to-door solicitations and other instances of unsolicited contacts that may occur outside of advertised sales events, (ii) provide or subsidize meals for a Potential Member at any event or meeting at which plan benefits are being discussed and/or plan materials are being distributed, (iii) offer gifts to Potential Members unless such gifts are of nominal value (as defined by the Marketing Guidelines) and are provided whether or not the recipient enrolls in a plan, (iv) distribute marketing materials or collect Carrier applications at educational events, (v) conduct sales activities in healthcare settings except in common areas, or (vi) market non-health care related products (e.g. annuities or life insurance) during any Medicare related sales activity or presentation.

Benefits may not be displayed on any marketing materials, mentioned in radio, television, or other digital ads without carrier and CMS approval. Benefits would include, but are not limited to, dental, vision, hearing, healthy food cards, Part B Giveback, gym memberships, or any other benefit offer by any health plan.

Materials, including communication materials, may not include an image of the Medicare card or other government-issued cards without permission from the issuer. Permission for using the Medicare card must come from CMS and other cards from the governmental entity that issued them (example: Medicaid state must issue permission to use the Medicaid card image.)

Effective September 30, 2023, Producers may not perform an educational event within 12 hours of a sales event in the same location.

**Marketing Through Unsolicited Contacts.** Medicare Program Requirements restrict marketing Medicare Plans through unsolicited contacts including approaching Potential Members in public areas and telemarketing. Producer shall comply with all Medicare Program Requirements regarding unsolicited contacts and conduct any permitted telemarketing activities in compliance with Laws, including “do not call” requirements of Governmental Authorities. All outbound call scripts referencing a Carrier must be approved by Carrier in writing prior to use by Producer or its Representatives.

### **Scope of Appointment**

Effective September 30, 2023 field agents must adhere to a 48-hour waiting period before a sales meeting can commence. Call center agents making outbound calls must adhere to a 48-hour waiting period before a sales call can commence.

- Exceptions include “walk-ins” and a beneficiary who wants to enroll within the last four days of the enrollment period. In either of these cases, document the SOA and proceed.

### **Compliance Contact:**

Alissa Morris  
Compliance Officer  
(941) 473-0800  
1-800-709-5513  
[compliance@advocatehealthllc.com](mailto:compliance@advocatehealthllc.com)