



MASSACHUSETTS

The BluePrint

Code of Ethics and Conduct

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Introduction

Blue Cross Blue Shield of Massachusetts, its Board of Directors, and all associates—including senior management and leaders—are committed to complying with the letter and spirit of all applicable legal and ethical standards, and performing their responsibilities with the highest degree of integrity and honesty. This is reflected in *The Blueprint: Code of Ethics and Conduct of Blue Cross Blue Shield of Massachusetts* and the Corporate Conduct Policies. In addition, all relevant aspects of the Blueprint are applicable to third parties doing business on behalf of Blue Cross, including consultants, agents, brokers, independent contractors, and Medicare first-tier and downstream entities. The cornerstones of *The Blueprint* are that we will obey the law and that we will do business “the right way”.

Knowing what the law requires—and figuring out what is “right” in certain circumstances—may not be simple. In many cases, the laws and principles that govern our activities are detailed and complex. For example, as a Medicare contractor, there are specific regulations that we must adhere to. *The Blueprint* is meant to help. The Associates’ Pledge (page 5) outlines the broad values and principles that guide our mission at Blue Cross Blue Shield of Massachusetts. The remainder of *The Blueprint* highlights some of the most important standards we need to be aware of as we perform our daily jobs.

No set of values or summary of laws, however, can cover all possible circumstances or anticipate every situation.

If you have a question about any part of *The Blueprint*, or about how to conduct yourself in a particular situation, you should discuss your concern with your leader, Human Resources, the Legal Department, or the Compliance Officer. Detailed policies on many of the topics covered here are distributed to associates most affected by a particular policy and are the subject of regular training. The actual policies are also available on the Policies and Procedure page on BlueWeb. If there is a conflict between *The Blueprint* and the actual policy, the policy governs. You may call the confidential Compliance Hotline at **1-877-874-8416** for guidance as well. Other resources are listed on page 18.

Reminder: All associates are expected to follow *The Blueprint*. Violations of the laws or rules summarized in these pages can result in corrective action. Depending on the nature of the violation, discipline can include immediate dismissal and, in some cases, could lead to civil or criminal prosecution. We can avoid the need for discipline, however, by following *The Blueprint*.

The Blueprint is an overview of the laws and corporate policies that affect our jobs. It does not represent an employment contract or alter the at-will nature of the employment relationship. If there is a conflict between *The Blueprint* and applicable law or a formal corporate policy, the actual law or policy will govern. Blue Cross Blue Shield of Massachusetts reserves the right to change, revoke, or divert from any of the policies and procedures set forth in *The Blueprint*.



Associates' Pledge

As an associate of Blue Cross Blue Shield of Massachusetts, I will honor the following pledge:

- + I will question and clarify any uncertainty concerning laws, regulations, and guidelines. If in doubt, I will ask my leader. I will not act in ignorance or in disregard of the accuracy of information.
- + I will not make any false statement, nor will I present materials known or suspected to be false.
- + I will not accept anything of value, such as money or gifts, offered for the express or implied purpose of inducing a decision, action, or inaction on my part or the part of the Company.
- + I will not offer anything of value, such as money or gifts, for the express or implied purpose of inducing a decision, action, or inaction on the part of others.
- + I will not accept an offer for a bribe or kickback, whether the offer is made directly or indirectly, overtly or covertly, in cash or in kind, to induce any kind of business relationship or decision.
- + I will maintain confidentiality and information security at all times. I will use confidential information, including—in particular—confidential information about members, solely for the purposes authorized.
- + I will act with utmost care when dealing with competitors to ensure that we do not violate federal antitrust law.
- + I will not discriminate or assist others to discriminate on the basis of sex, race, color, religion, ancestry, national origin, age, disability, veteran status, sexual orientation, gender identity or expression, or any other status protected by law.
- + I will actively support and participate in authorized audits or investigations relating to the Company's business.
- + I understand that a violation of this Pledge or any laws or rules summarized in *The Blueprint* may result in corrective action, which could include immediate termination of employment.

Corporate Conduct Policies

Conflicts of Interest

We all have a fiduciary duty to the Company. This duty means that we must act in the Company's best interest, protect its assets, and be loyal to it.

To uphold this duty, you must avoid undisclosed conflicts of interest. A conflict of interest may occur if your outside activities or personal interests influence or appear to influence your ability to make objective decisions in the course of your job responsibilities. To ensure compliance with the Company's policies on conflicts of interest, directors, officers, and senior leaders must complete and file an annual conflict of interest disclosure statement with the Board of Directors.

Note on disclosure: Potential conflicts of interest can often be managed as long as there is advance disclosure of the potential conflict. When in doubt, tell your leader or the Compliance Officer about the situation that may give rise to the conflict.

Here are a few specific guidelines:

- + Avoid the appearance of a conflict of interest, and disclose potential conflicts. You should take appropriate steps to avoid both conflicts of interests and situations that may appear to others to present a conflict of interest. Anytime you face a situation that might give rise to questions, you should disclose the potential conflict to your leader or the Compliance Officer. If you are not sure whether a situation presents a conflict, ask first.
- + Do not profit from a transaction involving the company. You must avoid participating in any Company decision, directly or indirectly, when you might personally benefit. Example: If you moonlight for a construction company, you should not participate in any way in a decision whether to award that firm a contract to perform a construction job for Blue Cross Blue Shield of Massachusetts. Even if you are not involved in the Company's decision-making process, you should disclose your financial interest to avoid questions as to whether you exerted improper influence.
- + Avoid conflicts with interests of family members. You must similarly avoid situations in which the interests of an immediate family member or close relative may be at odds with those of the Company. Example: You get involved in the appeal of a claim denial on behalf of your brother-in-law. Instead, the proper course would be to take no part in the appeal, inform your leader of the potential conflict, and let another associate handle it.

Corporate Conduct Policies

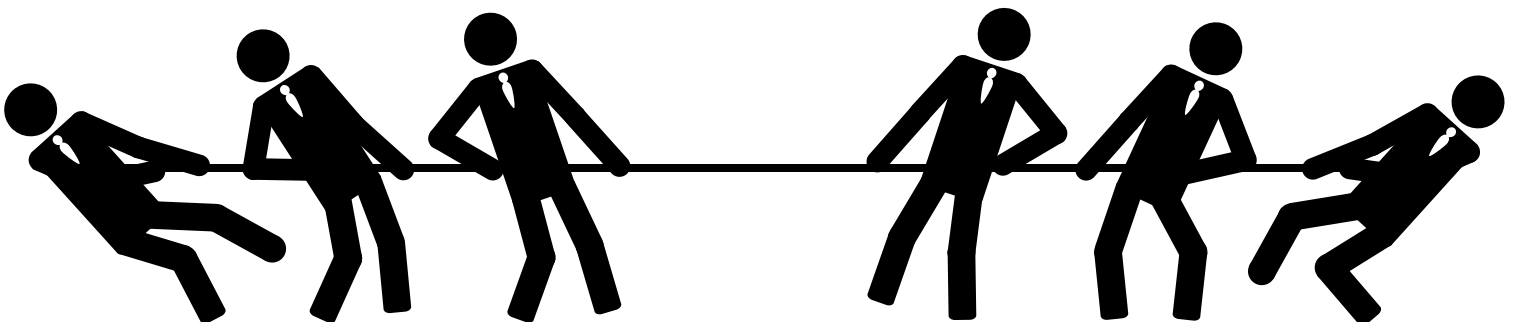
+ Do not use “inside information.” Never use confidential or proprietary corporate information for any purpose except as required to perform your job. Never disclose confidential or proprietary information to anyone outside the Company, and restrict disclosure inside the Company to those who need to know. Confidential and proprietary information includes information about members, medical information regarding associates, as well as business information, such as sales reports, account lists, planning documents, and descriptions of business initiatives that have not been disclosed publicly. The obligation to keep this type of information confidential remains even if you leave the Company. (More details about confidentiality can be found on page 12).

+ Do not use Company assets except for the Company’s benefit. The assets of Blue Cross Blue Shield of Massachusetts are to be used solely for the benefit of the Company and its members. Company assets include tangible things, such as money, equipment, and supplies, and also intangible things, such as business plans, member lists, financial data, network services and trade secrets.

+ Do not accept gifts or favors intended to influence you. You and your family members should refuse gifts or favors when it appears a gift is intended to influence you or the Company’s decisions. (More details about gifts and favors can be found on page 9).

Note on conflicts of interest: The most obvious examples of conflicts of interest involve financial interests (e.g., someone trying to take financial advantage of his or her relationship with Blue Cross Blue Shield of Massachusetts). Remember that conflicts may also arise in non-financial situations. You should avoid secondary employment to the extent that it creates an actual or perceived conflict of interest as outlined in the Company’s conflict of interest policy.

In considering whether a situation poses a conflict of interest, it may be helpful to ask yourself: “Would I be concerned if other people found out about it?” “How would it look if a member or one of our providers knew?” “How would I feel if it involved someone else?” “What is the right thing to do?”



Below are highlights of important corporate conduct policies of Blue Cross Blue Shield of Massachusetts. If you have questions about any of these matters, you should contact your leader, Human Resources, or the Compliance Officer. In reviewing these policies, remember that they are all intended to fit into our core values: integrity, accountability, compassion, and teamwork.

Equal Employment Opportunity

Blue Cross Blue Shield of Massachusetts prohibits discrimination against individuals on the basis of sex, race, color, religion, ancestry, national origin, age, disability, veteran status, sexual orientation and gender identity or expression, or any other status protected by law. This policy of equal employment opportunity applies to all aspects of the employment relationship, such as hiring, promotion, and compensation.

Sexual and Other Discriminatory Harassment

Associates at Blue Cross Blue Shield of Massachusetts are expected to refrain from harassment on the basis of sex, race, color, religion, ancestry, national origin, age, disability, veteran status, sexual orientation, gender identity or expression, or any other status protected by law. Prohibited harassment is verbal or physical conduct that creates an intimidating, hostile, or offensive work environment, including but not limited to, unsolicited or unwelcome sexual overtures or comments.

Prohibited harassment also includes any sort of workplace violence. To help ensure that no violent acts, intimidation, or threats occur at Blue Cross Blue Shield of Massachusetts, you may not possess firearms, explosive devices, or other weapons or dangerous materials on Company premises.

If you observe or experience any form of prohibited harassment or violence, you should immediately report the incident to your leader, Human Resources, the Compliance Officer, or the Compliance Hotline. Additional detail concerning the Company's harassment policies and internal complaint procedure is included in the Company's equal employment opportunity and sexual harassment in the workplace policies.

Drug-Free Workplace

We will not tolerate the unlawful manufacture, distribution, possession, or use of a controlled substance in our workplace. In addition to the usual forms of discipline, up to and including immediate termination, an associate who violates our drug-free workplace policy may be required to participate in a drug abuse rehabilitation program.

We will also report to appropriate government authorities any employee who is convicted of a drug-related crime that occurs at the workplace.

Corporate Conduct Policies

Alcohol in the Workplace

To ensure the unimpaired judgment of our associates and the decorum of our workplace, you may not report to work under the influence of alcohol or consume or possess alcohol while on Company property or on Company time. The only exception to this policy is for the rare event approved in advance by a member of senior leadership.

Note on drug and alcohol counseling: We are committed to assisting associates with substance abuse problems. Our employee assistance program offers confidential counseling and, if necessary, can refer you to rehabilitation programs. More information about counseling and referral programs is available by calling LifeWorks at **1-800-253-9062** or Human Resources.

Safe Workplace

We are committed to compliance with health, safety, and environmental laws and regulations that govern our facilities and operations. To help us maintain a safe and healthy workplace, you must report to your leader, the Facilities Department, the Chief Risk Officer, or the Compliance Officer any conditions that may be unsafe, unhealthy, or hazardous to the environment.

Political Contributions and Activities

You may not contribute money or resources to candidates, elected officials, or political organizations on behalf of Blue Cross Blue Shield of Massachusetts, nor may you use Company assets to support a candidate or issue. This restriction applies to services and facilities, such as office space, photocopying, secretarial help, or telephone use.

Although associates are encouraged to be active participants in the political process, associates should take care that their personal support for a candidate or issue not be mistaken for the position of the Company.

Gifts, Gratuities, and Contributions

Receiving Favors or Gifts

No gifts or entertainment of significant value may be accepted by an associate or any member of his or her immediate family from members, suppliers, government agencies, or anyone else with whom the Company does, or may do, business. Significant value is defined as a gift, favor, or service—including entertainment, meals, and tickets—with a fair market value exceeding \$100.



You may not accept any gift, favor, or service of any value—significant or not—if it appears or could be construed that the donor is seeking to influence an action or decision by the Company.

You may never accept money or its cash equivalent, such as gift certificates of any dollar value. Similarly you may not seek or request a gift or favor of any sort.

Giving Favors or Gifts

Except as described below, we may extend occasional business courtesies, such as modest gifts, meals, or entertainment that are appropriate to our business. In no case should you give expensive or inappropriate gifts or provide lavish hospitality to customers or potential customers or their employees that may unfairly influence their purchasing decisions. Do not give a gift, favor, or service of any kind that could be construed as a kickback, reward, or inducement for purchasing from the Company. Cash or its equivalent may not be given under any circumstance.

You may not give gifts, favors, or services of any kind to any federal, state, or municipal employee or official, regardless of value. This prohibition includes meals, beverages, entertainment, transportation, or any other item. Exception: the prohibition against gifts, favors, or services to public employees who (a) do not have authority to make or control health coverage purchasing decisions and (b) do not hold official positions where they may affect our business. For example, no gifts of any kind can be made to a state legislator, Division of Insurance employee, or municipal health coverage purchasing manager. Gifts that otherwise comply with this policy may be made, for example, to a municipal firefighter.

Note on stricter gift rules: Certain areas of the Company, such as procurement and government programs, have stricter rules on accepting and giving gifts.

Charitable Contributions and Activities

Blue Cross Blue Shield of Massachusetts has a longstanding legacy as a leader and innovator in addressing important health and social issues. Similarly, the Company encourages associates to participate in charitable activities, but associates cannot on their own commit the Company, or devote Company resources, to support any particular charity. Instead, any associate seeking the Company's support for a particular charitable effort should first seek approval from Corporate Relations.

In addition, you may not exploit the Company's business relationships to support any charitable activity, and you should be wary of attempts by persons with whom we do business to influence the Company's decisions by their support of our outside charitable interests.

Solicitation

Unrestricted solicitation and distribution of literature can be disruptive to the business environment and pose security risks. Please refer to the Company's Solicitation, Distribution/Charitable Activities policy if you have any questions regarding what forms of solicitation are permitted by the Company.

Corporate Conduct Policies

Accurate Books and Records

We are all responsible for the accuracy and integrity of our business records, including financial records, accounting entries, materials submitted to the government, and other documentation and information. Every record should precisely reflect the underlying facts or supporting information. False or misleading entries or statements are absolutely unacceptable. Our obligation goes beyond simply avoiding intentional deceit; if you are not sure of the accuracy of information, take the necessary steps to verify it. Attempts to influence or mislead any independent or certified accountant engaged in the performance of an audit of the financial statements of the Company for the purpose of rendering such financial statements misleading is prohibited.

If you discover an error or omission, you should take prompt and appropriate steps to correct the inaccurate information and, if appropriate, to notify your leader or the Compliance Officer.

Fraud and Abuse

Blue Cross Blue Shield of Massachusetts is committed to preventing, detecting, and addressing all aspects of fraud, waste and abuse against the Company, whether committed by associates, members, or external third parties. Examples of potential fraud may include submitting false expense reports, misappropriating member's personal information, or submitting claims for services not rendered. Associates who become aware of any potential fraud against the Company are required to report the suspected violation so that the allegation can be investigated and resolved.

There are several federal and state statutes designed to combat fraud and abuse in the health care industry. Among other things, these laws prohibit submitting false claims to the government and forbid receiving or giving a "kickback" of any sort in exchange for a referral of government-related business. Specific training concerning these laws is provided to associates who work with our government programs, and it goes without saying that absolute compliance with these laws is required of all associates.

Record Retention

We have specific rules governing the retention and destruction of records. In general, our record retention policy is to discard information that is no longer needed for our business unless a law, regulation, or trade policy requires retention for extended periods.

Some documents, such as health care records, contracts, corporate records, personnel records, and tax records, must be retained for extended periods. The specific rules governing how long certain records must be retained, and when records should be destroyed, depend on the type of document involved, and are reflected in the Company's record retention schedule.



Under the Company's record retention policy, a record retention coordinator has been designated for each area in the Company. The coordinator in your area can help you with any questions regarding the handling of certain documents, and he or she will be asked to certify annually that the policy is being implemented. You also can contact the records and information consultant or the Compliance Officer for further guidance.

Note on record retention: Whenever the Company is involved in a lawsuit, threatened lawsuit, audit, or investigation, we cannot alter, destroy, or discard relevant information— even if the schedule would otherwise permit destruction. Guidance on record preservation in the event of a lawsuit, threatened lawsuit, audit, or investigation is available from the Legal Department.

Confidentiality

Associates are required to safeguard our Company and member confidential and proprietary information by using reasonable measures during all phases of the information handling process. Disclosure of confidential information is restricted. Our work includes routine access to the most personal kinds of information about our members. Similarly, our business involves information of all kinds—from financial data to marketing strategies—that is proprietary to the Company and is essential to our success. Confidential and proprietary information includes sales reports, account lists, planning documents, personal information about members, medical information regarding associates, and descriptions of business initiatives that have not been disclosed publicly.

Improper disclosure of confidential information may be a violation of state or federal law, potentially subjecting the associate and the Company to civil or criminal liability. It is therefore critical that you protect our member's confidential information and the Company's proprietary information at all times. This requirement applies even after you leave the Company.

There are certain narrowly defined circumstances in which associates are permitted to disclose confidential information. (For example, information concerning a member's claim may be shared with that member or his or her legally authorized representative). In these cases, however, associates must follow the specific guidelines applicable to their particular business areas.

Please note that protection of confidential and proprietary information requires vigilance against inadvertent disclosures in social conversations or in business relationships with persons outside the Company, and even to associates within the Company who do not "need to know" the information. Do not discuss business matters in public places, including elevators, stairwells, and lobbies.

To protect the integrity and confidentiality of our computer systems and the data on our systems, you should at all times guard user IDs and passwords and otherwise maintain the security of our systems.

Corporate Conduct Policies

Associate Privacy

Your leader, Human Resources, the Privacy Officer, the Compliance Officer, or the Legal Department can help you with any questions involving confidentiality. Although we strive to respect each other's privacy with respect to associates' personal information and personal belongings, there are certain limitations on what is private at work. In particular, associates should be aware that information contained in or on Company equipment, such as desks, file cabinets, and electronic systems (including voicemail, email, and information stored or retrieved on a computer at work) is not private. Such information is monitored and is subject to review by the Company at any time.

Information Security

The Company has created administrative, physical, and technical safeguards to protect the integrity and confidentiality of the information we manage. All business information, regardless of the medium, must receive appropriate protection to provide the necessary assurance of confidentiality, integrity and availability. Associates are required to comply with security safeguards to protect member privacy and company data during all phases of the information handling process: from collection and storage to disclosure and disposal. All associates must remember to use security passwords appropriately and in accordance with company policy. Remember—privacy and security go hand in hand. You can find the Company's detailed policies regarding information security on the BlueWeb.

Social Media and Web

Social media sites such as Facebook, LinkedIn, Twitter, and YouTube are important and useful ways for associates to share their lives and opinions with family, friends, colleagues, and the community. The Company respects and embraces the role that social media plays in our lives for both personal and business use. Periodically, associates are even encouraged to interact with company-sponsored social media. Associates should also be mindful that the personal use of social media and the web provides an increased risk to our company's security, network, systems bandwidth, reputation, and overall business. You can find the Company's detailed policy regarding Social Media and Web Guidelines on the BlueWeb.



Intellectual Property

Associates should take care to preserve the intellectual property rights of Blue Cross Blue Shield of Massachusetts and to honor the rights of others. To that end, you must properly use copyright and service mark “legal language,” and comply with other requirements of the Blue Cross and Blue Shield Association service mark and graphic standards.

You may not make copies or otherwise reproduce copyrighted materials, including magazines, newsletters, and copyrighted computer software without the permission of the copyright owner or its agent. You also must make sure to honor license agreements under which the Company is entitled to use computer software. Violations of license agreements, such as making an unauthorized copy of a software program, can subject an associate to disciplinary action.

Competitive Practices

We operate in a competitive marketplace. While we want to compete aggressively for members and business opportunities, we will always compete fairly and honestly. We will avoid disparaging our competitors or improperly seeking their trade secrets or other confidential information.

Antitrust Compliance

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Antitrust concerns can arise in the context of contracting with others. These laws also can be violated by discussing certain business topics with a competitor. Because antitrust laws can be complex, you should consult with the Legal Department if you have any questions.

Information about Competitors

It is not unusual to obtain information about other organizations, including our competitors and other companies with which we do business, through legal and ethical means, such as public documents, public presentations, journal articles, and other published and spoken information. It is not acceptable, however, to obtain proprietary or confidential information about another organization through illegal means. It is also not acceptable to seek proprietary or confidential information in violation of a contractual requirement, such as a confidentiality agreement.

Price Fixing

No associate may create or participate in any agreement or plan with any competitor concerning our prices or price policies, their prices or price policies, fees, or the terms or conditions of sale of any service or product. To avoid even the appearance of collusion, you may not even discuss these topics with a competitor. Traditional business gatherings are potentially fertile grounds for conduct that might be perceived as unlawful. For example, trade and professional association meetings, conventions, and seminars are of particular antitrust concern because competitors may attend them. Associates who attend these gatherings may not discuss prices or fees, even during the social or entertainment portion of the program. If such discussions begin, you are required to leave immediately and report the situation to the Legal Department.

Corporate Conduct Policies

Agreements Restraining Trade

Certain types of anti-competitive understandings or agreements are suspect. These include agreements not to trade with others and agreements not to trade or deal in particular territories. These agreements may be unlawful—whether they are written or unwritten, formal or informal, understood or implied. It also does not matter whether they are made with a competitor or customer. While there are, of course, entirely lawful ways to use a limited or exclusive network, these arrangements require care to ensure compliance with governing law.

Reciprocity

The Company may purchase goods or services from an entity that is also a customer or potential customer. This practice is normal, but any form of pressure for reciprocity with another firm is prohibited. In other words, we do not link our sales to our purchases, nor do we allow other companies to dictate that we purchase goods or services from them simply because they are our customers.

Corporate Communications

Communication Inside and Outside the Company

Our goal in all corporate communications is to convey the truth, completely and persuasively, to all of our audiences—government authorities, associates, members, accounts, providers, suppliers, vendors, the media, and the general public. There are severe criminal and civil penalties associated with making false or misleading statements.

To ensure that the Company's public statements are accurate and consistent, corporate communications—including press releases, marketing materials, advertisements, and newsletters—should only be prepared by the area responsible for preparation of the particular communication. Similarly, responses to inquiries from government authorities and the media should be prepared by Company personnel responsible for ongoing communications with those requesting information, typically Corporate Communications, Government and Regulatory Affairs (GRA), or the Legal Department.

Note on lobbying: The Company's lobbying activities are heavily regulated and are coordinated through GRA. You should consult with GRA or the Legal Department before engaging in any contact with a legislator (or his or her staff) concerning pending legislation, and before engaging in any contact with a high-ranking member of the executive branch (or his or her staff) concerning a pending regulation.

Compliance Program

The Compliance Program is intended to demonstrate the absolute commitment of Blue Cross Blue Shield of Massachusetts to the highest standards of ethics and compliance. That commitment permeates all levels of the organization, including directors, officers, and associates.

To promote ethics and compliance throughout the Company, the Compliance Program implements a variety of education and training programs. The Compliance Program also investigates and acts on reports of possible misconduct.

Adherence to and support of the Compliance Program and participation in related activities and training will be considered in decisions regarding hiring, promotion, and compensation for all associates. Any bonus or incentive payment you may earn will be forfeited if you earn it by violating any applicable law or Company policy.

To Obtain Guidance or Report a Suspected Violation

To obtain guidance on an ethics or compliance issue or report a suspected violation, you may choose among several options. It is good practice to raise concerns first with your leader. If this is uncomfortable or inappropriate, you may also discuss your concern with another leader. (For example, it may be uncomfortable or inappropriate to raise an issue with your leader if it involves your leader's own conduct). You are always free to contact the Compliance Officer directly or to call the Compliance Hotline.

Blue Cross Blue Shield of Massachusetts will attempt to maintain confidentiality and protect the identity of persons reporting suspected misconduct. Disclosures will be made only to the extent required to complete investigations or if required by law or legal process.

There will be no retribution for reporting a possible violation in good faith. Any associate who deliberately makes a false accusation with the purpose of harming or retaliating against another associate, however, will be subject to corrective action.

Personal Obligation to Report Suspected Violations

To uphold our company-wide commitment to ethical and legal conduct, each associate has a personal responsibility to report any activity by any person that appears to violate applicable laws, regulations, or Company policies. A failure to report misconduct may subject you to discipline. Plan counsel have a duty to report material violations of law or breach of duty or similar violations by the Plan to the Chief Legal Officer. In the event of non-remediation, Plan counsel may have direct access to the Chief Executive Officer and/or the Audit Committee of the Board of Directors.

Compliance Program

Investigation of Misconduct

Whenever an apparent violation is reported, the Compliance Officer will promptly conduct a confidential investigation. If appropriate, the Compliance Officer may enlist assistance in an investigation from the Legal Department, the Audit and Controls Department, outside counsel, outside auditors, or private investigators. Associates must cooperate with any investigation. After review and investigation, the Compliance Officer may issue a written report, recommend corrective action, or recommend employee corrective action.

Discipline

Any associate who violates the law or the Company's policies or procedures, knowingly fails to report a violation, or fails to oversee compliance by associates he or she supervises, is subject to corrective action.

Corrective action ranges from a warning to immediate discharge, depending upon the circumstances. Violations may also result in referral to law enforcement and government agencies, if appropriate.

Hotline

Blue Cross Blue Shield of Massachusetts has set up a Compliance Hotline at **1-877-874-8416**. The hotline is confidential, toll-free, and may be used to report compliance issues or violations anonymously, 24 hours a day. It may also be used to discuss a question you may have concerning a particular ethical or compliance situation in which you are involved.

To raise a concern, ask a question or report any activity or conduct that may violate the law or Company policy, call Blue Cross Blue Shield of Massachusetts' Compliance Hotline at **1-877-874-8416**. Calls to the Compliance Hotline will be answered by a third party organization authorized by Blue Cross Blue Shield of Massachusetts to collect and document information provided on the call. When a call is placed, the operator will provide callers with the opportunity to remain anonymous if desired. If a caller opts to remain anonymous, no attempt will be made to determine the name or location of the caller. The hotline operator will ask questions based on the nature of each call to elicit as much information as possible about the issue, schedule any follow-up phone calls that may need to occur, discuss next steps regarding resolution of the issue, and invite the caller to phone the hotline if he/she has additional questions or concerns.



Information and Assistance

People Services.....	1-617-246-4747
Audit Department.....	1-617-246-5317
Corporate Citizenship.....	1-617-246-4339
Compliance Hotline.....	1-877-874-8416
Compliance Officer.....	1-617-246-3500
Fraud Hotline.....	1-800-992-4100
Legal Department.....	1-617-246-3500
LifeWorks.....	1-800-253-9062
Privacy Officer.....	1-617-246-3500
Chief Risk Officer.....	1-617-246-5358

Acknowledgment

I have received and understand The Blueprint: Code of Ethics and Conduct of Blue Cross Blue Shield of Massachusetts. I agree to honor the company's core values and abide by the Associates' Pledge. I understand my obligation to report violations to the Corporate Compliance Officer.

Date _____

Associate's Signature _____

Name (please print) _____

Employee ID Number _____

The Blueprint is an overview of the laws and corporate policies that affect our jobs. It does not represent an employment contract or alter the at-will nature of the employment relationship. If there is a conflict between *The Blueprint* and applicable law or a formal corporate policy, the actual law or policy will govern. Blue Cross Blue Shield of Massachusetts reserves the right to change, revoke, or diverge from any of the policies and procedures set forth in *The Blueprint*.



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