	Johns Hopkins HealthCare LLC Compliance Corporate	<i>Policy Number</i>	COR.016
		<i>Effective Date</i>	05/12/2011
		<i>Review Date</i>	11/29/2019
	<i>Subject</i> Code (Standard) of Business Ethics and Conduct	<i>Revision Date</i>	11/29/2019
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This document applies to the following Participating Organizations:

EHP Elder Plus Johns Hopkins Advantage MD Priority Partners
 US Family Health Plan

Keywords: COC, code of conduct, ethics, standard of conduct

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I. ACTION

	New Policy	
	Repealed Policy Date	
	Superseded Policy Number	

II. POLICY


It is the policy of Johns Hopkins HealthCare LLC ("JHHC") for all JHHC workforce members to act in a manner consistent with:

- Organizational core values, supporting policies, and its ethical standards
- Federal and State laws
- Contractual requirements
- Accreditation standards

III. PURPOSE

JHHC is dedicated to providing the most affordable, accessible, highest quality integrated delivery system that will stand as a model for addressing the health care needs of a large population. Inclusion, innovation, service, integrity, compassion, and collaboration are the core values of JHHC's mission. It is with these values in mind that JHHC has developed this Code of Business Ethics and Conduct.

This Code of Business Ethics and Conduct is intended to direct all JHHC Personnel in their daily work activities and to assist JHHC in its efforts to prevent and detect criminal conduct. The Code establishes standards of behavior to encourage ethical conduct and a commitment to compliance with law that should be applied to all interactions with our members, beneficiaries, enrollees, vendors, network providers, coworkers, visitors, health care professionals, the surrounding community, and other organizations that conduct business with JHHC. All JHHC Personnel must abide by the Code of Business Ethics and Conduct. JHHC has made the Code available to all JHHC personnel. It is the responsibility of JHHC personnel to act in a manner which is consistent with JHHC core values, its supporting policies, its ethical standards, and the law.

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IV. SCOPE

This policy applies to all JHHC Personnel in all Lines of Business.

V. DEFINITIONS


Lines of Business for the purpose of this policy refers to the following entities Priority Partners Managed Care Organization, Inc., Johns Hopkins Employer Health Programs, Inc., The Johns Hopkins Medical Services Corporation and the Johns Hopkins US Family Health Plan, Hopkins ElderPlus, and Hopkins Health Advantage, Inc.'s Advantage MD, and other commercial insurance plans.

JHHC Personnel refers to individuals acting on behalf of JHHC or the participating entities that it manages, whether permanent or temporary employees, volunteers, interns, telecommuters, managers, supervisors, directors, officers, executives, or persons employed by the Johns Hopkins Health System ("JHHS") for assignment to JHHC.

VI. RESPONSIBILITIES

Standards of Business Ethics and Conduct

- A. All persons who come into contact with JHHC – members, beneficiaries, enrollees, network providers, vendors, health care professionals, JHHC personnel, visitors, and all others – will be treated with respect and courtesy.
- B. JHHC requires honesty and integrity from all its Personnel in performance of their responsibilities and in communications with members, beneficiaries, enrollees, vendors, network providers, coworkers, visitors, health care professionals, regulators, law enforcement officials, auditors, and other organizations that conduct business with JHHC.
- C. JHHC Personnel shall act in accordance with all internal policies and procedures, all applicable policies of JHHS or the participating entity, including the JHHS Corporate Compliance Plan, and JHHS policies related to accepting gifts and interacting with industry, and in compliance with all applicable Federal, state, and local laws, JHHC contractual obligations, and accreditation standards.
- D. All JHHC Personnel are encouraged to exercise due diligence to prevent and detect criminal conduct and shall perform their responsibilities in an ethical manner.
- E. All JHHC Personnel shall promptly report all known or suspected unethical and/or unlawful activities, including but not limited to known or suspected violations involving fraud, conflict of interest, bribery, gratuity or violation of the False Claims Act, to their supervisors, another JHHC supervisor, the JHHC Senior Director of Corporate Compliance, the JHHC Senior Director of Medicare Compliance, or the JHHS Compliance Hotline by dialing 1-844-SPEAK2US (1-844-773-2528) or TTY 711, or make an online report at johnshopkinsspeak2us.com. To access the Advantage MD Hotline, reports may also be made by calling 1-844-773-2528 or TTY 711, or by accessing the aforementioned website. Known or suspected conflicts of interest may also be reported to the JHHC Corporate or Medicare Compliance and Human Resources Departments. If there is any credible evidence that such actions have occurred, JHHC shall promptly report such actions to the appropriate parties, including but not limited to the appropriate regulatory agencies. No JHHC Personnel will be discharged, nor will other adverse action be taken against JHHC Personnel, for disclosure of illegal conduct in connection with any federal contracts with which JHHC is engaged.
- F. All JHHC Personnel engaged in performance of federal contracts shall not offer or give any gratuity (cash or other value) to a federal government employee with the intent to obtain favorable treatment under the contract, nor will any such person use appropriated federal funds to pay any person to influence or attempt to influence a federal official, member of Congress or Congressional staff in connection with the award, extension, amendment or renewal of any federal contracts.
- G. All JHHC Personnel shall preserve the confidential nature of protected health and business information. JHHC Personnel with access to this information shall protect its confidentiality, sharing it only when authorized by the member or his or her legal representative or when required or permitted by law.
- H. All JHHC Personnel shall utilize JHHC facilities, resources, and property, including computer hardware and telecommunication networks, in a manner that is appropriate and consistent with their job functions.

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- I. All JHHC personnel shall undergo annual mandatory Compliance and Business Ethics and Conduct training.
- J. JHHC does not tolerate discriminatory practices or biases regarding age, race, sex, gender, ethnicity, disability or other classifications prohibited by law.
- K. JHHC does not tolerate harassment, retribution, or retaliation against any person who in good faith reports suspected violations of law, internal policies, or this Code of Ethics.

Failure to abide by these ethical standards **will** result in disciplinary action. For alleged violations of the Code of Business Ethics and Conduct, JHHC will weigh all relevant facts and circumstances including, but not limited to, the extent to which the behavior was contrary to the express language or general intent of the applicable standard, the egregiousness of the behavior, the individual's history with the organization and any other factors that JHHC or, in some instances, JHHS deems relevant. Discipline for failure to abide by the Code of Business Ethics and Conduct may, in JHHC's discretion, range from oral reprimand to termination.

Nothing in this Code of Business Ethics and Conduct is intended to nor shall be construed as providing any additional employment or contractual rights to JHHC.

VII. CROSS REFERENCE

Annual Compliance Program Description

VIII. APPROVALS

Electronic Signature(s)	Date
Mary Donnelly Medicare Compliance Officer	12/18/2019
Paul Gillan Practice Group Leader and Chief Legal Counsel, Managed Care and Population Health Legal	12/11/2019

Review/Revision Dates: 5/12/11, 5/13/11, 5/10/12, 5/1/13, 5/27/14, 1/23/15, 3/31/16, 9/11/16, 8/11/17, 5/2/18, 11/14/18, 11/29/19