	Johns Hopkins Health Plans Compliance and Regulatory Affairs Corporate	<i>Policy Number</i>	COR.016
		<i>Effective Date</i>	10/31/2023
		<i>Approval Date</i>	10/31/2023
	<i>Subject</i> Code (Standard) of Business Ethics and Conduct	<i>Supersedes Date</i>	01/16/2023
		<i>Original Date</i>	05/12/2011
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This document applies to the following Participating Organizations:

EHP	Elder Plus	Johns Hopkins Advantage MD	Johns Hopkins Health Plan of Virginia Inc. (JHHPVA)
Priority Partners	US Family Health Plan		

Keywords: 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	Repealed Policy Date	
	Superseded Policy Number	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") dba Johns Hopkins Health Plans ("JHHP") for all JHHP 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

JHHP 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 JHHP's mission. It is with these values in mind that JHHP has developed this Code of Business Ethics and Conduct.

This Code of Business Ethics and Conduct is intended to direct all JHHP Personnel in their daily work activities and to assist JHHP 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,

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enrollees, vendors, network providers, coworkers, visitors, health care professionals, the surrounding community, and other organizations that conduct business with JHHP. All JHHP Personnel must abide by the Code of Business Ethics and Conduct. JHHP has made the Code available to all JHHP personnel. It is the responsibility of JHHP personnel to act in a manner which is consistent with JHHP core values, its supporting policies, its ethical standards, and the law.

IV. SCOPE

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

V. DEFINITIONS


Lines of Business for the purpose of this policy refers to the following entities Solutions, Priority Partners Managed Care Organization, Inc., Johns Hopkins Employer Health Programs, Inc., the Johns Hopkins US Family Health Plan, and Hopkins Health Advantage, Inc.'s Advantage MD, Johns Hopkins Health Plan of Virginia Inc. (JHHPVA) and other commercial insurance plans.

JHHP Personnel refers to individuals acting on behalf of JHHP 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 JHHP.

VI. RESPONSIBILITIES

Standards of Business Ethics and Conduct

- A. All persons who come into contact with JHHP – members, beneficiaries, enrollees, network providers, vendors, health care professionals, JHHP personnel, visitors, and all others – will be treated with respect and courtesy.
- B. JHHP 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 JHHP.
- C. JHHP 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, JHHP contractual obligations, and accreditation standards.
- D. All JHHP Personnel are encouraged to exercise due diligence to prevent and detect criminal conduct and shall perform their responsibilities in an ethical manner.
- E. All JHHP 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 JHHP supervisor, the JHHP Executive Director of Compliance and Regulatory Affairs, the JHHP 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. If there is any credible evidence that such actions have occurred, JHHP shall promptly report such actions to the appropriate parties, including but not limited to the appropriate regulatory agencies. No JHHP Personnel will be discharged or have other adverse action taken for disclosure of illegal conduct in connection with any federal contracts with which JHHP is engaged.
- F. Known or suspected conflicts of interest shall be reported, in accordance with the Health System's Conflict of Interest policy, to the JHHS Corporate Compliance Department.
- G. All JHHP 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

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person use appropriated federal funds to pay any person to influence or attempt influence a federal official, member or Congress or Congressional staff in connection with the award, extension, amendment or renewal of any federal contracts.

- H. JHHP does not tolerate discriminatory practices, biases or segregated facilities based on age, race, color, sex, gender, sexual orientation, ethnicity, national origin, religion, disability or other classifications prohibited by law.
1. Segregated facilities means any work areas, eating areas, waiting areas or other physical space that is segregated on a prohibited basis either by an explicit directive or by practice. The term does not include separate or single-user rest rooms provided to assure privacy between the sexes.
 2. Advantage MD and Johns Hopkins Health Plan of Virginia must provide services in a culturally competent manner and to promote equitable access to all enrollees, including but not limited to people with limited English proficiency or reading skills; people of ethnic, cultural, racial or religious minorities; people with disabilities; people who identify as lesbian, gay, bisexual, or other diverse sexual orientations; people who identify as transgender, non-binary, and other diverse gender identities, or people who were born intersex; people living in rural areas and other areas with high level of deprivation; and people otherwise adversely affected by persistent poverty or inequality.
- I. JHHP 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.
- J. All JHHP Personnel shall preserve the confidential nature of protected health and business information. JHHP 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.
- K. All JHHP Personnel shall utilize JHHP facilities, resources, and property, including computer hardware and telecommunication networks, in a manner that is appropriate and consistent with their job function.
- L. All JHHP Personnel shall undergo annual mandatory Compliance and Business Ethics and Conduct training.

Failure to abide by these ethical standards **will typically** result in disciplinary action. For alleged violations of the Code of Business Ethics and Conduct, JHHP 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 JHHP or, in some instances, JHHS deems relevant.

Discipline for failure to abide by the Code of Business Ethics and Conduct may, in JHHP'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 JHHP.

VII. CROSS REFERENCE

Annual Compliance Program Description

VIII. APPROVALS

Electronic Signature(s)	Date
Mary Donnelly Medicare Compliance Officer	11/08/2023
Paul Gillan Practice Group Leader and Chief Legal Counsel, Managed Care and Population Health Legal	11/13/2023

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Joseph Rammacca Senior Director of Human Resources	11/09/2023
John Wells Executive Director of Compliance and Regulatory Affairs	11/08/2023
Amanda Walter Assistant Director of Corporate Compliance	11/08/2023
Shannon Crenshaw Supervisor of Privacy	11/08/2023

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, 12/23/20, 10/13/21, 2/22/22, 3/10/22, 1/16/23, 10/31/23

IX. POLICY NOTIFICATION CHART

	Yes/No	If yes in 2nd column, notify the following department of policy revisions:
Does this policy relate to NCQA?	Yes	Quality Improvement
Does this policy relate to Qlarant/MDH requirements?	Yes	Quality Improvement
Does this policy relate to DHA contractual requirements?	Yes	USFHP Administration
Does this policy relate to CMS contractual requirements?	Yes	Medicare Plan Administration Medicare Compliance