

Code of Conduct

Table of Contents

- Our Foundational Values..... 3**
 - Our Vision and Values 3
- Living Our Code of Conduct..... 4**
 - Introduction..... 4
 - Scope 4
 - Compliance with the Law and the Highest Ethical Standards 4
 - Seeking Guidance and Reporting Issues 5
 - Non-Retaliation 5
- Taking Care of Those We Serve 6**
 - Employee Licensure and Certification Renewals..... 7
 - Privacy and Security of Personal Information 7
- Acting with Integrity 9**
 - Keeping Accurate Records 10
 - Confidential and Proprietary Information 10
 - Conflicts of Interest..... 10
 - Conflicts of Interest Disclosure..... 11
 - Producer Disclosure to Customers..... 11
 - Asset Protection 11
 - Insider Trading Laws..... 12
 - Disclosure of Non-Public Material Information..... 13
 - Records Retention and Management..... 13
- Respecting Colleagues 14**
 - Diversity and Inclusion 15
 - Non-Discrimination..... 15
 - Workplace Violence..... 15
 - Health and Safety 15
 - Labor Practices..... 16
 - Colleague Privacy 16
 - Drugs and Alcohol..... 16
 - Gambling..... 16
- Interacting with Others..... 17**
 - Interactions with Others..... 18
 - Accepting Gifts, Meals, Entertainment or Other Things of Value..... 18
 - Providing Gifts, Meals, Entertainment or Other Things of Value..... 19
 - Gifts and Entertainment Policy Q&A..... 19
 - Antitrust Laws.....20
 - News Media20
 - Social Media20
 - Business Firewalls21
 - Environmental Protection.....21
- Doing the Right Thing22**
 - Conduct with Public Officials.....23
 - Corporate Political Contributions.....23
 - Individual Political Activities.....23
 - Fair Dealing23
 - Anti-Kickback Laws.....24
 - Supplier Engagement and Import / Export Compliance.....24
 - Fraud, Waste and Abuse.....24
 - Bribery and Foreign Business Dealings25
 - Anti-Money Laundering, Anti-Terrorism and Boycott Compliance.....26
 - Medicare Compliance26
 - Government Reimbursement and the False Claims Act27
 - Ineligible Health Care Providers.....27
 - Government Requests and Subpoenas27
- Holding Ourselves Accountable28**
 - Colleague Responsibilities.....29
 - Leadership Responsibilities.....29
 - Financial Leaders.....30
 - Resources30
 - Investigations.....31
 - Consequences of Wrongdoing.....32
- Appendix34**



Our Foundational Values

We make good on our promises.
Each of us must be committed to the
highest standards of business conduct.

Our Vision and Values

Our Vision

As leaders in health, we are redefining the future. Through innovation in technology, information sharing, advanced healthcare delivery systems and aligned incentives, our unique partnership will allow us to offer a health plan that supports better health and an improved healthcare experience at an affordable price.

Our Values

Innovation - We are bold and creative in helping our members achieve better health. We are driven to pursue health in new ways to deliver innovative solutions for our stakeholders.

Affordability - We are dedicated to delivering the greatest value to each individual stakeholder. We identify options to drive higher quality outcomes and to offer healthcare at an affordable and fair price.

Accountability - We each have a stake in achieving better health. The Health Plan, Care Providers, Members and Plan Sponsors share a goal for achieving measurable outcomes that demonstrate better health.

Collaboration - Through our unique relationships we are collaborating across traditional boundaries to improve the overall health experience. We do this by leveraging the strengths of our health system and our health plan to deliver a superior network of knowledge and care resources.

Excellence - We are committed to delivering an excellent experience to those we serve. We achieve this by delivering care and service that is coordinated, streamlined and designed to optimize health.

Integrity - In building present and future partnerships, we are committed to and accountable for conducting our professional and personal lives with integrity. We will build relationships based on loyalty, fairness, truthfulness and trustworthiness.

Living Our Code of Conduct

Introduction

We at Allina Health Aetna (the “Company”) are in the business of helping to improve people’s lives. It sounds simple, but sometimes it isn’t. Tough issues can get in our way. This Code of Conduct (“Code”) is intended to help resolve ethics and compliance issues by providing the information, tools and resources necessary to make good decisions. Making good decisions isn’t always easy.

Competing interests, approaching deadlines and outside distractions can make good decision-making a challenge.

When faced with business decisions that may affect the reputation of Allina Health | Aetna, we use the framework below.

- 1. Should I be troubled by this? Is this consistent with Allina Health | Aetna values?**
- 2. Who will be affected by my decisions? How will they be affected?**
- 3. What’s my responsibility to act? What will happen if I don’t act?**
- 4. What are the ethical considerations?**
- 5. Who needs to be involved in making this decision?**
- 6. Am I being true to myself and to the values of Allina Health | Aetna? How would my actions appear to customers or the public?**

Answers to these questions can help guide your thought process when faced with tough decisions – but this approach isn’t perfect and neither is this Code. No code can give answers for every situation that may arise. In the end, Allina Health | Aetna relies on each colleague to use sound judgment to make the right decision and, when necessary, the tough choice. It is important to read this Code and understand the roles and responsibilities of an Allina Health | Aetna colleague.

Scope

This Code applies to everyone in the Company, including the Board of Directors and all colleagues, when doing work for Allina Health | Aetna. The same high ethical standards apply to all, regardless of job or level in the organization. In certain circumstances, this Code also applies to contractors and temporary colleagues. It is the responsibility of every colleague to be familiar with all policies and procedures relevant to their job functions.

Allina Health | Aetna Code of Conduct

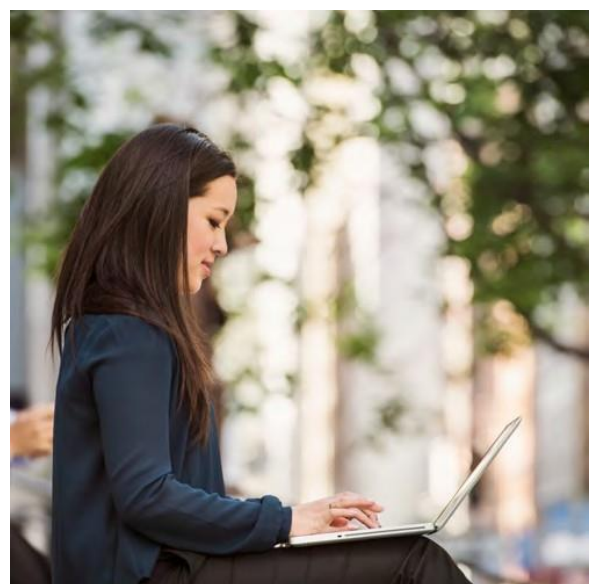
Compliance with the Law and the Highest Ethical Standards

Allina Health | Aetna is committed to upholding the highest ethical standards and complying with applicable laws and regulations, federal health care program requirements, this Code and our Company policies or requirements.

Policies and procedures provide more information about many of the topics in this Code. In the unlikely event a waiver of, or amendment to, the Code seems to be necessary, contact your Compliance Officer or legal contact.

This Code is intended to help resolve ethics and compliance issues by providing the information, tools and resources necessary to make good decisions.

If you become aware of a violation of this Code, the law or our policies, you have an obligation to report it right away. If you are ever in doubt about the right thing to do in conducting business, ask for help.



Seeking Guidance and Reporting Issues

When you are looking for guidance, the first step is to consult your supervisor. When consulting with your supervisor does not seem reasonable, consider approaching another manager, your department head or anyone else in your management chain. You may also consult another resource, as described at the end of this Code, if that seems more appropriate to the situation.

As noted below, you can always call the Ethics Line. It also may be helpful to consult applicable policies, procedures and the Code.

You may use the Allina Health|Aetna Ethics Line to report problems or issues or ask questions.

In addition to reporting problems or issues to your supervisor or the Ethics Line, you also have an obligation to report certain events that could impact Allina Health|Aetna.

Please note that any convictions involving controlled substances, convictions involving Medicare, Medicaid or any state or federally funded program, and convictions that could result in exclusion from participation in any State or Federal health care program must always be reported. Also, if your professional health care licenses have received disciplinary action, if any of your employment related professional licenses have expired or been revoked and/or sanctioned; or if you have been convicted of a criminal offense other than a minor traffic violation. Please see the "Colleague Responsibilities" section at the conclusion of the Code, for additional information regarding these types of reporting obligations.

Q&A

I know of a situation that may violate our Code. Should I report it even if I am not completely sure there is a problem?

Yes. You are responsible for reporting possible violations immediately. Report it to your manager or Compliance Officer or call Ethics Line. Your report will be taken seriously and investigated. It is better to report a suspicion that turns out not to be an issue than to ignore a possible violation.

As a manager, what should I do when an employee raises a concern?

When an employee raises a concern or asks for help, managers should remain objective, open and responsive. Don't think of a report as "bad news;" consider it a positive sign of employee commitment to doing the right thing. Be sure to report any compliance or business conduct and integrity issue right away to your Compliance Officer or designated legal contact.

My manager is aware of a potential violation of our Code of Conduct but is not taking any action. What other options do I have to address the problem?

You may speak with your Compliance Officer, call the Ethics Line, speak to your designated legal contact, or you may write to the

Allina Health | Aetna office at: 1550 Utica Avenue South Suite 250 St. Louis Park, MN 55416 Attn: Allina Health | Aetna Compliance Officer



You may call the **Allina Health|Aetna Ethics Line** anonymously and toll-free at (888) 516-3901.

www.CVSHealth.com/EthicsLine

Non-Retaliation

Allina Health|Aetna prohibits retaliating against anyone for raising, in good faith, a legal or ethical concern or cooperating with an investigation. Retaliation can also be against the law, leading to potential civil liability and criminal penalties. No one may seek revenge against, or try to "get even" with, any colleague who makes a good faith report, regardless of who is implicated. Retaliation is taken very seriously by the Company, and if it occurs it will result in discipline up to, and including, termination of employment.

Taking Care of Those We Serve



Employee Licensure and Certification Renewals

Due to the nature of certain roles, some of us are required to maintain current professional licensure, certification or registration and follow the code of ethics of their professional organizations. Additionally, the Company always maintains federal and state licenses as required by its business activities.

When documenting the professional services you provide, all entries must be accurate and truthful.

You must:

- Provide professional services only if you have the required license, certification or registration.
- Keep required, professional credentials up to date if you perform duties that require credentialing.
- Immediately notify the Ethics Line and your supervisor if your license is revoked or sanctioned or a state or federal regulatory agency has taken any action that will negatively impact your license or ability to practice.
- Notify the Ethics Line immediately if you have been convicted of a crime.

Privacy and Security of Personal Information

Our role in the health care industry requires us to collect and maintain personal information of those we serve. This information is protected under federal and state privacy and security laws; and includes “Protected Health Information” (PHI) and “Personally Identifiable Information” (PII). These laws require PHI and PII be handled in a confidential manner. International privacy laws may also apply to certain information.

PHI includes information about a person’s physical or mental health condition, information we receive in connection with our provision of health care, health plan, or pharmacy benefit services, and identifies (or can reasonably be used to identify) a person. PHI relates to that person’s health care or status, including payment for that care, but also includes information like the person’s telephone number if we receive it when providing health care services or benefits.

PII is information that can also identify a person, either by itself or when combined with other information, but isn’t necessarily health care related information. This includes information such as a person’s last name or telephone number.

You should always remember that those we serve, including colleagues using our services, count on us to protect their personal information. In addition, protecting PHI, PII and the confidentiality of those we serve is a condition of employment with Allina Health | Aetna.

Always remember to use and disclose the minimum necessary when handling a person's personal information.

When dealing with a person's personal information you must:

- Use and disclose only the minimum necessary amount of PHI or PII to do the required work including:
 - Using health information with all identifiers removed whenever possible;
 - Sharing PHI and PII with the minimum number of people; and
 - Viewing only the minimum amount of information required.
- Disclose PHI or PII only with appropriate written authorization from the individual, unless the law authorizes or requires disclosure.
- Never view plan member or colleague personal information out of curiosity.
- Appropriately dispose of unneeded copies of documents containing PHI or PII.
- Keep documents with confidential information out of sight in a locked file cabinet or desk drawer, and never leave PHI or PII active on computers, sitting at a printer, in fax machines or other generally accessible areas.
- Ensure PHI and PII transmitted or transported outside the Company is encrypted. This includes not only emails but also PHI and PII stored on portable devices such as USB devices, disks, laptops and mobile devices.

The privacy and personal information of those we serve is central to what we do at Allina Health | Aetna. Violating these or other privacy requirements will result in disciplinary action up to and including termination, even for a first offense. Violations can also result in civil and/or criminal penalties for Allina Health | Aetna and the colleague in question.



Compromised PHI or PII

If you see any of the following, immediately contact the Privacy Office:

- PHI or PII openly discussed or left unprotected.
- Requests for more information than the minimum necessary to perform a job.
- Unencrypted PHI or PII transmitted electronically outside the Company.
- PHI or PII sent unintentionally or by mistake.

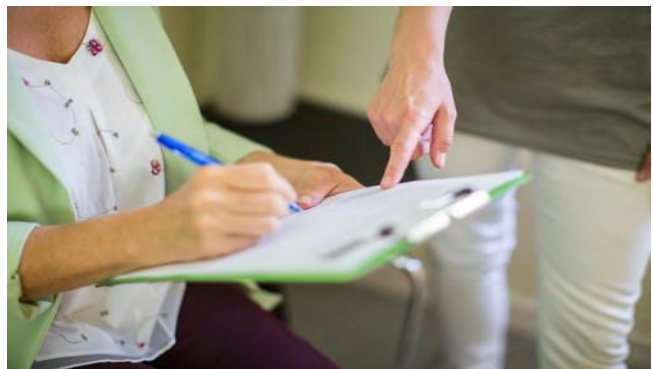
Privacy Office (Legal Department)

One CVS Drive

Woonsocket, RI 02895

(866) 443-0933

PrivacyOffice@CVSHealth.com



Question

If I have questions about PHI/PII that may have been sent to the wrong person, where can I go for guidance?

Answer

Report any concern about an improper disclosure of PHI/PII to the Privacy Office at PrivacyOffice@CVSHealth.com.

Acting with Integrity

Keeping Accurate Records

Our record keeping must always be accurate, legal and proper. We are required to submit many documents and reports to U.S. Securities and Exchange Commission and other regulators. These materials and any other public communications must be complete, fair, accurate, timely and easy to understand.

If you suspect improper record keeping, report it immediately to your manager, Compliance Officer or legal contact. You may also report your concern anonymously via Ethics Line, Compliance, or the Allina Health|Aetna Board of Directors.

We keep books, records and accounts in a way that shows a fair, complete and accurate accounting of all business transactions and use of assets. Our records reflect reasonable detail to show the true nature of expenses and other transactions, who was involved, and any affiliation to the Company or third parties, such as government entities.

We will never alter or falsify company records. Unless permitted by applicable law or regulation, we do not execute off-balance sheet transactions, arrangements and obligations or maintain unrecorded funds or assets. If such transactions are allowed, we disclose them as required by the U.S. Securities and Exchange Commission or other applicable rules or regulations.

Officers and managers are expected to build and maintain an internal accounting system with controls that:

- Prevent unauthorized, unrecorded or inaccurately recorded transactions.
- Result in preparation of financial statements based on generally accepted accounting principles.

Managers also must ensure that third parties who create or update Company records follow the same rules, where appropriate.

Confidential and Proprietary Information

Confidential and proprietary information such as trade secrets (which may include certain Company policies and/or procedures), technological advances, customer lists, knowledge of acquisitions or divestitures and financial data are some of the Company's most valuable business assets. This includes information that might be of use to competitors or harmful to the Company or those we serve if disclosed to others. To determine whether or not information is proprietary, consider whether information that is handled or shared on the job might give our competitors an unfair advantage if disclosed to them.

Use proprietary information only for job-related purposes, never for personal gain or to the detriment of Allina Health | Aetna.

You must:

- Ensure you are in compliance with our distribution of policies and procedures to outside parties, if you are asked to produce an Allina Health|Aetna policy or procedure.
- Share proprietary information with colleagues only on a "need-to-know" basis, and not disclose it to persons outside the Company, including business associates or those we serve, except under the terms of a confidentiality agreement approved by the Legal Department.
- Return all proprietary information in your possession upon leaving Allina Health|Aetna.
- Not share proprietary and confidential business information of a former employer if you worked for a competitor before joining Allina Health|Aetna.

Conflicts of Interest

A "conflict of interest" may arise when personal interests or activities appear to improperly influence our ability to act in the best interests of the Company. Situations involving a conflict of interest may not always be obvious or easy to resolve.

Some circumstances that may present an actual or potential conflict of interest include, but are not limited to:

- Outside employment;
- Participation in outside organizations including board positions;
- You or a close relative having a financial interest in an Allina Health | Aetna competitor, vendor or client;
- Use of Company assets for certain purposes;
- Employment of relatives; and
- Intimate or romantic relationships.

For further details as to what may qualify as a potential conflict of interest, please consult **Appendix A**, Avoiding

Conflicts of Interest. If any transaction or relationship could lead to a conflict of interest for a corporate officer or a member of the Board of Directors, disclose it to the Compliance Officer, who will notify the Board of Directors. Conflicts of interest involving the Compliance Officer also must be disclosed to the Board of Directors. Additionally, certain colleagues may also be required to sign an annual Conflicts of Interest Certification.

Conflicts of Interest Disclosure

Colleagues must make prompt and full disclosure of any situation that may involve an actual or potential conflict of interest. Colleagues should contact their manager, Compliance Officer, or Ethics Line to make such disclosures, or to report any questions, problems or issues regarding conflicts of interest.

Producer Disclosure to Customers

Working with brokers or other producers could create real or apparent conflicts of interest. Customers should understand our financial arrangements with producers and colleagues must follow Allina Health | Aetna's rules for disclosing relationships with producers. Ask your manager, Compliance Officer or legal contact if you have questions.

Asset Protection

The Company's physical assets include items such as inventory, office and equipment, vehicles, supplies, reports and records, telephones, computers, laptops, tablets and any other tangible property that Allina Health | Aetna owns, rents or leases. Assets may also be non-physical, for example, the Company name, logo, trade secrets, strategies and customer information. Protecting Allina Health | Aetna assets against loss, theft or other misuse is the responsibility of every colleague because it directly impacts our profitability and our reputation.

Don't engage in prohibited outside employment activity.

When circumstances warrant, Allina Health | Aetna reserves the right to require any colleague, while on duty or on Allina Health | Aetna property, to submit to a non-invasive inspection of their person, vehicle, uniform, locker, package, handbag, briefcase or personal property.

Allina Health | Aetna also reserves the right to monitor communication tools, including the content and usage of email and voicemail, and any such communications which are the sole property of Allina Health | Aetna including any and all communications regarding Allina Health | Aetna business on colleagues' personal devices. Allina Health | Aetna reserves the right to temporarily take possession of any personal device(s) used to communicate Allina Health | Aetna business to image relevant communications.

You should:

- Only use the Allina Health | Aetna name for authorized Company business and never in connection with personal activities;
- Use computer information, including email, primarily for business purposes because it is the property of the Company and not of the colleague; and
- Not share user access credentials (e.g., IDs and passwords) with anyone.





Insider Trading Laws

It is generally against federal law to trade stocks or other securities of a public company if we have material non-public information about that company.

Information is considered material if it would likely affect the stock price or an investor's decision to buy, hold or sell the stock. Nor may we "tip" or pass information on to others to trade, if the "tip" is based on information that is not available to the public. We will always review and abide by all insider trading and securities laws, regulations and policies applicable to securities transactions and non-public information.

Please note that either positive or negative information may be material. For questions or if you have any concerns as to whether information you possess may be considered material non-public information, employees and officers should contact your Compliance Officer or legal contact.

Information that may be regarded as material may include, but is not limited to:

- Unannounced projections of future earnings or losses;
- Significant pending or proposed mergers, acquisitions or financing transactions;
- Major changes in senior management;
- Anticipated financial information that departs from what the market would expect;
- Confidential and proprietary information about our business partners; or
- Winning or losing a key client.

Disclosure of Non-Public Material Information

Colleagues and members of the Board of Directors are not permitted to make any disclosure of material, non-public information about the Company to any person or entity outside the Company unless confirmed by legal. If a colleague or member of the Board of Directors of Allina Health | Aetna believes that a disclosure of material non- public information about the Company has occurred, he or she must immediately notify your Compliance Officer or legal contact..



Records Retention and Management

Allina Health | Aetna works to ensure we handle and maintain all Company records in accordance with our records management program where applicable, and provides colleagues, contingent workers and suppliers with direction and support in properly managing our records throughout their life cycle. Records used by professionals, such as pharmacists and nurses, must follow all regulatory and accreditation standards and requirements. We never destroy records subject to audit, pending investigation or pending litigation until the audit, investigation or litigation is completed, even if they have reached the end of the required retention period. We must always manage records according to our records management program.

Respecting Colleagues

Diversity and inclusion

Our workforce is our greatest strength. We come from different places and cultures and have a variety of experiences, skills and talents. We embrace these differences to work as a team treating each other with integrity and respect. We believe encouraging diversity and inclusion among our colleagues leads up to superior business results.

Non-Discrimination, harassment, and retaliation

Allina Health | Aetna is committed to maintaining a workplace environment free from discrimination, harassment and retaliation. Our continued success depends on the full participation of all our colleagues — regardless of race, ethnicity, ancestry, color, religion, creed, sex/gender (including pregnancy, childbirth, breastfeeding or pregnancy related conditions), national origin, sexual orientation, gender identity or expression, physical or mental disability, reproductive health decision-making, medical condition, age, veteran status, military status, marital status, genetic information, citizenship or immigration status, unemployment status, political affiliation, legally protected medical leaves (requested or approved) or on any other basis or characteristic prohibited by applicable federal, state or local law. We recruit, hire, train, develop and promote the best people available, based solely upon job-related qualifications. Additionally, Allina Health | Aetna is committed to complying with the Americans with Disabilities Act by prohibiting discrimination against applicants and colleagues with disabilities and by making reasonable accommodations that allow disabled individuals to perform the essential functions of their jobs and enjoy equal access to the benefits and privileges of employment with our Company.

In addition, Allina Health | Aetna strictly prohibits and will not tolerate sexual harassment, or any other harassment based on any other characteristic prohibited by applicable federal, state, or local law. All colleagues, but particularly leaders, have a responsibility for keeping the work environment free from unlawful harassment. Colleagues are strongly encouraged, and leaders are required to immediately report incidents of harassment of which they become aware. Allina Health | Aetna also strictly prohibits and will not tolerate retaliation against a colleague who in good faith has complained about discrimination or harassment in violation of this policy or who has participated in a good faith investigation of a prohibited discrimination, harassment, or sexual harassment complaint. Colleagues should promptly notify the Ethics Line at any time to report any incidents of prohibited discrimination, harassment, or retaliation.

Workplace Violence Prevention

Allina Health | Aetna does not tolerate acts or threats of workplace violence committed by or against colleagues, contractors, visitors, patients, customers, or vendors. If an instance of workplace violence or a threat poses imminent danger call 911. You can also report other instances to your manager or call the Ethics Line.

Health and Safety

We all have a right to work in a safe and healthy environment. Unsafe practices can lead to serious consequences, such as personal injury, injury to colleagues and the Company or other serious outcomes. We are committed to the well-being and safety of ourselves, our colleagues and anyone doing business with us.

You must:

- Always follow facility safety rules, regulations, procedures and warnings, particularly those that cover dangerous equipment and materials.
- Safely handle and dispose of medications or other substances that may be toxic.
- If you ever witness or suffer an accident, or see unsafe conditions, report the situation immediately. You have the right to report any work-related injury or illness to the Company without any retaliatory action for doing so. You can report work-related injuries or illnesses to Human Resources.

Examples of Harassment

- Inappropriate physical contact.
- Unwelcome sexual advances, requests for sexual favors, suggestive comments, inappropriate physical contact and any other unwelcome verbal or physical conduct of a sexual nature.
- Displaying derogatory, vulgar, suggestive or obscene pictures, cartoons, calendars, posters or drawings.
- Retaliation for reporting or threatening to report acts of misconduct or for reporting work-related injuries or illnesses.
- Comments, jokes, insults, slurs, offensive language and other unwelcome actions that are offensive or stereotypical based upon age, religion, gender, gender identity or expression, race, color, sexual orientation, national origin, disability, military or veteran status and any other protected category or personal characteristic.
- Threats or acts of violence and intimidation. Threats, stalking, even suggestions of violence in the workplace, are all considered inappropriate behavior.

Labor Practices

Allina Health | Aetna is committed to compliance with all applicable laws and regulations, including those concerning payment for all hours worked, human rights and working conditions. Allina Health | Aetna complies with all such federal, state and local laws and regulations, including not doing business with a vendor or business partner that illegally or improperly employs underage workers. The Company also prohibits the use of any forced or compulsory labor.

Colleague Privacy

At Allina Health | Aetna, our work sometimes requires access to colleague health care and other sensitive information. We must protect the confidentiality of this information and provide the same level of protection we provide for similar information of the people we serve. That means you should never access, share or disclose any confidential or sensitive information about another Allina Health | Aetna colleague, unless you are required to do so to fulfill your job responsibilities.



Drugs and Alcohol

We are committed to providing an alcohol-free and drug-free work environment. The unauthorized use, possession, sale, exchange or purchase of drugs or illegal substances on Company premises, or at any time when representing the Company, is strictly prohibited. Likewise, the unauthorized use, possession, sale or exchange of alcohol on Company premises or at any time when representing the Company is strictly prohibited, except when associated with an approved business meal or legitimate business event. Prescription drugs ordered by a physician, which do not interfere with job performance, are permitted. We should never come to work under the influence of alcohol, drugs (including lawfully prescribed drugs) or any other substance that could impair our ability to perform our job or jeopardize the safety of others.

Gambling

Consistent with our commitment to complying with all federal and state laws, Allina Health | Aetna strictly prohibits illegal gambling, raffles or other games of chance using Company resources or in Company facilities. This includes sports betting pools, brackets and all other forms of gambling with a pay in and pay out of money or other benefit or item of value.

Interacting with Others



Interactions with Others

Allina Health | Aetna is committed to the highest ethical standards and to following all laws and regulations in everything we do, including our business interactions.

When dealing with vendors, clients, customers, payors, brokers, patients, physicians, public officials, and other third parties, our interactions should be professional exchanges that communicate business needs or service offerings and corresponding products.

Giving and receiving any gifts, meals, entertainment or other things of value is a customary way to strengthen business relationships and is generally an accepted practice at Allina Health | Aetna. That said, specific rules apply depending on whether you are giving or receiving the courtesy.

Accepting Gifts, Meals, Entertainment or Other Things of Value

Keep these general rules in mind when **accepting** meals, gifts or entertainment:

- You and the person or entity providing the meal, gift or entertainment must attend the event together.
- The value of the event must be modest by local standards.
- The venue has to be conducive to business discussions and the event must include or be contiguous to legitimate business discussions.
- You may only accept gifts of nominal value such as branded mugs, hats or other similar items.

A colleague must not accept any gift that is more than nominal in value, including tickets to an event that the supplier or prospective supplier does not plan to attend.

When accepting meals, gifts or entertainment you may not:

- Accept travel, lodging, seminar or event fees in connection with an otherwise permitted business event.
- Accept any expense for your spouse or other guest.
- Accept large-scale meals or entertainment events where a disproportionate number of Allina Health | Aetna colleagues attend compared to the number of people from the entity hosting the event (e.g., departmental dinners or similar events).
- Accept gift cards, cash, or cash equivalents.

We recognize patients and customers will sometimes offer gifts of appreciation for good service. Colleagues may accept occasional, unsolicited gifts of appreciation of nominal value from patients or customers; but remember, accepting gift cards, cash, or cash equivalents, is never allowed.

If you have questions about accepting any gift, meal, entertainment or other thing of value, get written approval from your supervisor before you accept it. If, as a supervisor, you have questions about approving any gift, meal, entertainment or other thing of value that has been offered, contact your Compliance Officer.

To avoid putting yourself in the position of having accepted any improper gift, meal, entertainment or other thing of value, discuss with your Compliance Officer before you accept it.

Providing Gifts, Meals, Entertainment or Other Things of Value

If you are providing any gift, meal, entertainment or other thing of value, special rules may apply. This is because gifts, meals, entertainment or other things of value offered to third parties can create enormous risk for the Company and courtesies offered to these people are carefully controlled. It's a good idea (sometimes required) to ask your supervisor's permission before you provide any gift, meal, entertainment or other thing of value to a third party.

When providing meals, gifts or entertainment, you must:

- Keep meals and entertainment modest as judged by local standards.
- Attend with the person you are providing the courtesy to.
- Ensure the venue is conducive to business discussions and the event includes or is contiguous to legitimate business discussions.
- Limit gifts to items of nominal value.

Always exercise good judgment when engaging in entertainment that is part of your work responsibilities.

There are additional requirements if you are providing meals to a physician. In these situations, the meal must:

- Be approved in advance and in writing by your supervisor.
- Be part of an informational or educational presentation.
- Not include or be part of an entertainment or recreational event.
- Occur in an office or hospital setting unless it is impractical to do so.

Remember, it is never permissible to give gift cards, cash, or cash equivalents.

If you have any questions, ask your manager or Compliance Officer. For interactions with government employees and public officials, see **Appendix C**, the Government Contracts section of this Code.

You are responsible for understanding and following the rules. If you accept or provide any gift, meal, entertainment or other thing of value that is later found to be improper, you will be held accountable for your decision. However, you can easily avoid this mistake by reviewing the policy and asking your supervisor for guidance. If you are a supervisor and you're unsure if any gift, meal, entertainment or other thing of value should be approved, ask your Compliance Officer. Consult **Appendix B**, Gifts, Hospitality and Entertainment, for additional guidance.

Gifts and Entertainment Policy Q&A

Question

A potential vendor of Allina Health | Aetna has invited me to dinner to discuss a potential business arrangement. The expected cost of my dinner is under \$50.00. Do I need to obtain approval from my manager?

Answer

No, you do not need approval for the dinner, as long as the dinner is conducive to business discussions.

An Allina Health | Aetna supplier has offered me two tickets to the Cubs game on Opening Day. He can't make it to the game. May I accept the tickets?

No, you may not accept the tickets. Since the supplier will not be at the game with you, there is no opportunity to have business discussions.

I am an Allina Health | Aetna colleague and would like to give a Visa gift card to a client for their wedding. Is this permitted?

No, you may not provide gift cards, cash or cash equivalents, as a gift to the client.

Antitrust Laws

Antitrust laws are designed to protect competition by prohibiting monopolization, price fixing, predatory pricing and other practices that unreasonably restrain trade. We never discuss pricing, suppliers or territories with competitors, nor make agreements with them on these or other competitive issues. Under certain circumstances, even informal discussions with competitors regarding business plans, marketing, pricing, cost or other similar matters may be illegal.

We gain information about competitors only in legal and ethical ways. Just as we expect competitors to respect our confidential information, we respect theirs. Improperly obtained competitor proprietary information cannot be used to the advantage of Allina Health | Aetna. Be careful during any conversations with competitors. Discussions regarding pricing, costs, suppliers or territories may be out of bounds.

News Media

At Allina Health | Aetna, only designated staff is authorized to speak with the news media on the Company's behalf (e.g., statements to the press, inquiries from radio, television, newspaper, magazine or trade journal personnel). We never speak with or otherwise have contact with a member of the press on behalf of Allina Health | Aetna without appropriate authorization.

Q&A

I am active on a social media site. If I have an opportunity to post information that would be good for our business, may I post it?

You may not speak for the Company unless your manager has given you approval to do so. If you post information that relates to your job responsibilities, you must disclose your affiliation with the Company, and clearly state that your comments reflect your personal opinions and do not necessarily reflect the opinions of the Company. Never post

confidential information on a social media site or any other website.

May I use Company letterhead to write a letter to the editor of my local paper? I believe the issue is important to our company.

You may not use Company letterhead or your job title to write about any issue unless you have been authorized to do so. If you believe the issue requires an official response from the Company, speak to your manager and Compliance Officer to determine if it is appropriate for you to speak on the Company's behalf.

The supplier who provides software enhancement services to my department asked me to provide a quote he can post on his company website about how much our Company values his services. As long as I only say good things, is this okay?

No. You may never speak for the Company unless you have permission to do so. In this case, you should refer the request to your Compliance Officer or legal contact..

Social Media

Allina Health | Aetna colleagues who choose to make use of social media or otherwise engage in online communications as an identifiable colleague of Allina Health | Aetna must always comply with

Social Media Guidelines at all times and on all forms of social media.

Consistent with the Company's approach to interacting with the traditional news media, only designated Allina Health | Aetna colleagues are authorized to speak on behalf of the Company on social media. Colleagues who choose to speak on social media about the Company in any way must make it clear that they are an Allina Health | Aetna colleague, but not speaking on behalf of the Company or as an official Company representative.

All Allina Health | Aetna branded social media accounts must be approved in advance. It is against Company policy for any colleague to create an Allina Health | Aetna social media account without proper authorization. Questions should be directed to your Compliance Officer.

We must always be respectful when posting on social media. Never post Allina Health | Aetna confidential information or personal information about our patients, customers or your colleagues online. Never take pictures or post photos of any workspace that may contain confidential information. Never take pictures of patients or customers without their consent. Doing so is a violation of this Code, Company policy and potentially privacy laws and may result in disciplinary action up to and including termination of employment.

Never post Allina Health | Aetna confidential information or personal information about our patients, customers or your colleagues online.

Business Firewalls

As a good business practice, Allina Health | Aetna maintains firewalls between select businesses within the Company to separate and protect certain competitively sensitive information each business possesses. Colleagues may not use competitively-sensitive information that is held by the Company, to compete unfairly in the marketplace. Competitively sensitive information includes contract terms, pricing and other financial arrangements. These firewalls become important in contract negotiations, bid preparation, pricing services, and establishing financial arrangements, in which the businesses must compete on the same terms as their competitors. Information firewalls also maintain commercial relations with Allina Health | Aetna clients and suppliers who may be competitors to certain Allina Health | Aetna business units.

Environmental Protection

Allina Health | Aetna respects the preservation of natural resources and improvement of the environment. The Company cooperates with government bodies and communities in environmental protection efforts and complies with environmental laws and regulations. The Company ensures all environmentally sensitive and hazardous materials are identified and managed to ensure their safe handling, movement, storage, recycling, or reuse and disposal.

Doing the Right Thing

meeting with government personnel.

Conduct with Public Officials

We are committed to dealing with public officials according to the highest ethical standards. Our conduct with public officials, including any political contributions or business transactions, must comply with applicable laws and regulations and Company policy, including disclosure requirements.

Allina Health | Aetna policy prohibits giving or offering anything of value, directly or indirectly, to a public official, including any colleague or agent of a government-owned business in order to influence official action or obtain an improper advantage. "Anything of value" means not only cash, but also gifts, meals, entertainment, political contributions, offers of employment or other benefits.

Corporate Political Contributions

Only corporate officers are authorized to make corporate contributions on behalf of the Company to a political candidate, and such contributions must be made consistent with Company policy. "Contributions" means not only funds, but also loans, donations of products or supplies, use of facilities, Company personnel or anything else of value.

Federal Elections: It is against the law to use Company resources to make any political contribution related to a federal election, whether to a candidate, political party or political action committee (PAC). Contact your Compliance Officer or legal contact if you have questions.

State Elections: In some states we may use Company corporate resources for state election purposes, as allowed by that state's law. All corporate political contributions by the Company require prior written approval, utilizing specific processes and forms, from your Compliance Officer or legal contact, no matter what the source of the resources.

Lobbying

Lobbying is the practice of communicating with government officials about matters that are important to the Company. Lobbying is strictly regulated by Federal and State government rules and our own Company policies. Employees may not communicate with elected officials or their staffs on behalf of the Company without clearance.

As a general rule, communications with other specific government personnel are the responsibility of specific groups, including Compliance, and Legal. All employees, with the exception of certain designated employees, must seek authorization from the appropriate group before contacting, responding to, or

Individual Political Activities

Allina Health | Aetna encourages colleagues who wish to be politically active on their own time, using their own resources, to support political candidates and causes of their choice; as long as it is clear they are not speaking or acting on the Company's behalf. Individuals must not use Company time or resources when acting as a volunteer for a political candidate or cause. Colleagues may not solicit subordinate colleagues for political contributions or use vendor, customer or client lists for such solicitations. Allina Health | Aetna will not reimburse any personal political contributions made by colleagues, consultants or vendors. In addition, certain covered colleagues and covered directors are required to obtain approval before making personal campaign contributions that would be regulated by Pay-to-Play laws.

Fair Dealing

Many of our products and services are primarily contractual promises. As we strive to outperform our competition, we will do so honestly, openly, fairly and with integrity. We will deal fairly with our customers, members, providers, clients, suppliers, regulators and others around the world with whom we do business.

Guidelines for fair dealing:

- We refuse to participate in any conduct or sales or other practice that is intended to mislead, manipulate or take unfair advantage of anyone, or misrepresent products, services, contract terms or policies to anyone.
- We refuse to be part of the following or any other practices that may illegally restrain competition:
 - Fixing prices;
 - Allocating or dividing markets or customers;
 - Boycotting or refusing to deal with competitors, customers or suppliers.
- We do not discuss or share sensitive competitive information (for example, relating to pricing) with representatives of other companies or industry and trade associations.
- We do not engage in untruthful or misleading advertising.
- We never break any law or regulation, including unfair trade or insurance practices laws.
- Consult with your Compliance Officer or legal contact on any matter relating to actual or potential noncompliance with any law or regulation or any of Allina Health | Aetna's contractual commitments.

Anti-Kickback Laws

We comply with applicable federal and state anti-kickback laws and regulations. These laws prohibit payment or receipt of something of value intended to encourage purchasing, leasing or ordering of an item or service that may be reimbursed under a government health care program, such as Medicare or Medicaid. "Something of value" can take many forms, such as cash payments, entertainment, credits, gifts, free goods or services, the forgiveness of debt or the sale or purchase of items at a price that is not consistent with fair market value. It also may include the routine waiver of co-payments and/or co-insurance.

The federal Anti-Kickback Law that applies to Medicare, Medicaid and federal government contracts prohibit anyone from asking for or receiving, or offering or giving, anything that has value in exchange for any of the following:

- Referrals for goods or services paid for (even in part) by a federal healthcare program.
- Buying, leasing or ordering a facility, service, or item paid for (even in part) by a federal healthcare program.
- Recommending or arranging for someone else to buy, lease or order a facility, service or item paid for (even in part) by a federal healthcare.

Anti-kickback laws are complex. You should consult your legal contact about whether it is appropriate to provide something of value to those we serve.

Supplier Engagement and Import / Export Compliance

Our suppliers are an extension of our Company. It is important that we engage suppliers in ways that uphold our commitment to integrity and excellence. You must follow the Company's procurement process, so that Strategic Procurement will:

- Contractually obligate suppliers to comply with relevant laws, regulations, and client requirements in accordance with Company policy;
- Mitigate risk associated with supplier-provided goods and services;
- Competitively source goods and services in accordance with Company policy;
- Minimize the potential for conflicts of interest.
- As you work with suppliers, you must:
- Ensure a Mutual Non-Disclosure Agreement is in place before you engage the vendor;
- NOT negotiate directly or sign any contract with suppliers;

- Safeguard Allina Health | Aetna and client information;
- Honor commitments to safeguard supplier confidential information;
- Promote positive supplier relationships through professional conduct, courtesy and impartiality;
- Report any potential conflicts of interest to your manager, legal contact, or Compliance Officer.

We never break any law or regulation, including unfair trade or insurance practices law.

Fraud, Waste and Abuse

There are differences between fraud, waste and abuse. One of the primary differences is intent and knowledge. Fraud requires the person to have an intent to obtain payment and the knowledge that their actions are wrong. Waste and abuse may involve obtaining an improper payment but does not require the same intent and knowledge.

Fraud, Waste and Abuse are defined as:

Criminal Fraud

Knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any health care benefit program; or to obtain, by means of false or fraudulent pretenses, representations or promises, any of the money or property owned by, or under the custody or control of, any health care benefit program. This violates criminal law.

Waste

Overutilization of services or other practices that, directly or indirectly, result in unnecessary costs to a federal health care program. Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.

Abuse

Includes actions that may, directly or indirectly, result in unnecessary costs to a federal health care program. Abuse involves payment for items or services when there is no legal entitlement to that payment and the provider has not knowingly and/or intentionally misrepresented facts to obtain payment.

Allina Health | Aetna colleagues should keep in mind that even if intentions are good, choosing not to follow a policy could be interpreted by the government as fraud or payment abuse. Allina Health | Aetna requires all colleagues to be compliant with fraud, waste and abuse laws. Penalties for failing to comply include, but are not limited to, the following:

- Disciplinary action up to, and including, termination where appropriate;
- Criminal convictions or fines (individually and at the corporate level);
- Civil monetary penalties;
- Loss of licensure/sanctions; and
- Exclusion from participating in federal health care programs.

Bribery and Foreign Business Dealings

Allina Health | Aetna demands compliance with U.S. and applicable non-U.S. anti-bribery and anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act of 2010.

These laws prohibit us from personally, or through Allina Health | Aetna, authorizing, giving or promising, directly or indirectly, anything of value to U.S. or non U.S. government officials, colleagues or agents of government-owned businesses, political candidates or campaigns, or any other individual or entity, in order to obtain or maintain business or receive special treatment for the Company. There is no exception for facilitating payments, which generally are small payments to low-ranking officials to expedite the performance of a routine act to which we are already entitled. It is important to remember that engaging in bribery, or even appearing to engage in such activity, can expose the individuals involved as well as Allina Health | Aetna to criminal liability.

Any request for authorization or payment that would violate this provision, or any information suggesting this provision has been violated, must be reported immediately to your Compliance Officer, Legal contact or to the Ethics Line.

Question

We're hosting an international health care forum. I'd like to invite the administrator of a government-owned hospital in China. Can I offer to pay her travel and lodging costs?

Answer

Before you extend the invitation to this person, who would be considered a government official, consult your Compliance Officer or legal contact. Several factors determine whether the invitation and offer to pay is allowed. If the invitation could be perceived as an attempt to influence a public official in order to gain a business advantage, it would be inappropriate.

I don't work in either the U.S. or the U.K. In my country it is customary to give gifts when meeting with a business prospect, including a government official. If I am not violating any local law, do I need to be concerned?

Yes. Statutes like the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act extend to activities anywhere in the world. Gift policies should be reviewed carefully with your Compliance Officer or legal contact. Remember, though, with regard to business gifts, the safest course of action is not to give or receive any gifts at all.

A “payment” refers to anything of value. This includes money or other benefits such as charitable or political contributions, sponsorships, scholarships, gifts, hospitality, entertainment and travel. A government official may include government workers, political parties and their officials, political candidates and the family members of these individuals.

If you have questions on how these laws and related policy apply, contact your Compliance Officer or legal contact..

Anti-Money Laundering, Anti-Terrorism and Boycott Compliance

Money laundering involves hiding the origin of unlawfully gained money, for example through drug transactions, bribery, terrorism or fraud. Allina Health | Aetna is committed to complying fully with all anti-money laundering laws and regulations in the U.S. and in other countries such as the United Arab Emirates, Ireland, the United Kingdom and Singapore. We will conduct business only with reputable customers involved in legitimate business activities and with funds derived from legitimate sources.

If applicable to your business, you should know and follow the Company’s Health’s International Trade guidelines to ensure compliance with:

- Requirements of the U.S. Office of Foreign Asset Control (OFAC), including those related to OFAC country sanctions or doing business with anyone on the Specially Designated Nationals List;
- Applicable requirements of other sanctions regimes, including the European Union (EU) Financial Sanctions Regime, United Nations Common Foreign and Security Policy and Monetary Authority of Singapore; and
- Laws prohibiting companies from participating in or cooperating with international trade embargoes, boycotts or unrecognized sanctions that have been imposed by other countries.

Allina Health | Aetna takes reasonable steps and has established policies and procedures to prevent and detect unacceptable and suspicious forms of payment, including money orders. Alert your manager to any payment or other unusual customer transaction that seems inappropriate or suspicious. Contact your Compliance Officer or legal contact if you have questions on how these laws and guidelines apply.

Medicare Compliance

We are committed to having an effective Medicare Compliance Program based on the Centers for Medicare & Medicaid Services (CMS) guidance and the Federal Sentencing Guidelines.

This program is described in applicable policies and procedures. We expect you to participate in and support this program as necessary. This Code is the underlying framework for our Medicare Compliance Program and associated policies and procedures. Medicare products are governed by various regulations, including Title XVIII of the Social Security Act; Code of Federal Regulations sections 42 CFR 422 and 423; and sub-regulatory guidance released by CMS (for example, HPMS memos). Our Medicare businesses have comprehensive fraud, waste and abuse programs designed to comply with laws and regulations, including compliance operational oversight, risk assessment, data analysis, investigations, training and processes to manage identified issues through corrective actions.

Government Reimbursement and the False Claims Act

Federal and state false claims acts, and similar laws prohibit submitting a false claim or making a false record or statement in order to gain reimbursement from, and/or avoid an obligation to, a government-sponsored program, such as Medicare or Medicaid. We adhere to all applicable laws, regulations and program requirements when billing federal or state health care programs.

...the Company prohibits retaliation against anyone for raising a legal or ethical concern or cooperating with an investigation.

Ineligible Health Care Providers

The government has the authority to exclude individuals or entities that have engaged in abuse or fraud from participation in Medicare, Medicaid and other federal and state health care programs. Allina Health | Aetna will not employ or contract with any person or entity to furnish services or items reimbursable through a federal or state health care program if that person or entity has been excluded from a government-funded program or convicted of offenses that could result in exclusion.

Government Requests and Subpoenas

It is our policy to cooperate with reasonable requests for information from government agencies and regulators.

You should:

- Notify the Legal Department before responding to a subpoena, search warrant, request for an interview or other non-routine request for access to information related to Company matters;
- Always cooperate fully and be truthful in any information you provide to the government; and
- Never alter, withhold or destroy records related to an investigation.



Holding Ourselves Accountable

Colleague Responsibilities

As a colleague, you have certain responsibilities related to compliance and integrity.

All colleagues must:

- Report if you have been placed on any state or federal exclusion lists, including the U.S. Department of Health and Human Services Office of Inspector General (OIG) and/or General Services Administration (GSA); or if any of your employment-related professional licenses have expired, or been revoked and/or sanctioned.
- Immediately report any conviction of a criminal offense other than a minor traffic violation. For purposes of this reporting obligation, the term “conviction” includes:
(1) a finding of guilt against you; (2) a court’s acceptance of a plea of guilty or nolo contendere (no contest) from you; (3) your entrance into a pre-trial agreement to avoid conviction; or (4) your entrance into a First Offender, deferred adjudication, pardon program or other arrangement or program where a judgment of conviction has been withheld. However, the term “conviction” does not include: (1) arrests or charges that did not result in conviction; (2) convictions that have been judicially dismissed, expunged, erased or sealed; or (3) convictions that state law does not permit an employer to consider. Notwithstanding the above, please note that any convictions involving controlled substances, convictions involving Medicare, Medicaid or any state or federally funded program, and convictions that could result in exclusion from participation in any state or federal health care program must always be reported.
- Understand and follow the Code and Company policies and procedures.
- Conduct your work and professional activities ethically and in accordance with all applicable laws, regulations, Federal health care program requirements, corporate integrity agreements and court orders.
- Speak up and report any business activity that you believe may violate the law or the Code, using the resource that is most comfortable.
- Cooperate with investigations when requested and protect the integrity of the investigation by maintaining its confidentiality upon request by the investigator.
- Use resources to ask a question or get help when something is unclear or doesn’t feel right.
- Use good judgment in cases where there is no clear rule, law or policy.

Speak up and report any business activity that you believe may violate the law or the Code, using the resource that is most comfortable.

Leadership Responsibilities

While setting the tone at the top, Allina Health | Aetna leadership must “walk the talk” and demonstrate the Company’s values in all of their dealings on its behalf. Allina Health | Aetna leaders are responsible for making strategic business decisions that align with our ethical standards and with this Code.

Allina Health | Aetna leaders, including Managers and Supervisors, must also be knowledgeable about the content and operation of the Compliance Program. The leadership team plays an important role in building integrity, respect, credibility and long-term sustainability for the Company.

Because leadership sets an example for all colleagues, they must:

- Maintain a positive, ethical work environment;
- Make certain that colleagues understand what is expected of them both professionally and ethically;
- Maintain an open-door policy on a routine basis for colleagues to ask questions and raise concerns;
- Address issues raised by colleagues by listening and taking action, when appropriate;
- Ensure colleagues complete all training in a timely manner;
- Address all reports of misconduct and never ignore misconduct or retaliation;
- Reinforce this Code with colleagues;
- Communicate all policies and procedures;
- Be fair and objective; and
- Be a positive role model.

Financial Leaders

Financial leaders have special responsibilities related to Sarbanes-Oxley requirements. They must establish, maintain, and periodically certify the adequacy of internal controls for financial reporting. These leaders are also responsible for reporting material deficiencies or weaknesses in the Company's internal control.

Resources

The resources listed in this document should be used when you need some help or want to report an issue. It is the responsibility of each colleague to use these resources for guidance, advice, information and/or reporting and to keep reports and other interaction with the Compliance Officer confidential.

These resources can help you with:

- Code issues;
- Ethical situations not specifically covered in this Code;
- Interpretation of Company policies and procedures;
- Internal control and/or accounting issues; and
- Fraud, waste and abuse questions or concerns, including concerns related to our Medicare or Medicaid participation.

Documents

These are the written resources to guide your decisions:

- Code of Conduct;
- Allina Health | Aetna Colleague Handbook; and
- Company policies and procedures.

People

Many people are available in the Company to help you with advice or information and for reporting concerns:

- Compliance Officer
- Legal contact
- Privacy Officer
- Your manager or someone else in your management chain

Or, to make complaints or report concerns directly to your Compliance Officer or the Allina Health | Aetna Board of Directors, you may send your communication addressed to the foregoing at:

AH|A Compliance Officer

1550 Utica Avenue South, Suite 250
St. Louis Park, MN 55416
Or

AH|A Board Chairman at the address above or in person

You may also write to the Audit Committee of the Aetna Board of Directors at: One CVS Drive, Woonsocket, RI 02895

Our subcontracted first tier, downstream and related entities can use these same resources to report possible violations or business conduct and integrity concerns.

Every reported compliance or fraud, waste and abuse concern will be thoroughly investigated and addressed or corrected, as appropriate. Rest assured that your reports are welcomed and encouraged. Our Company prohibits intimidating or retaliating against anyone who in good faith:

- Makes a complaint or reports a violation to the Company or any law enforcement or government agency;
- Collaborates or helps with a government or internal investigation; or
- Provides information to the government or Company about a breach of law or policy.

Remember to consult your manager or Compliance Officer if you are unsure whether you or your external business partner (e.g., contractor, supplier, first tier, downstream or related entity) are aware of all the compliance regulations that apply to the work you do for the Company. Nothing in the Code of Conduct or other Company policy is intended to prohibit you from reporting to, or responding to an inquiry from, a governmental authority about a suspected violation of state or federal law.

Ethics Line

The Ethics Line is a phone resource established to help our subcontracted first tier, downstream and related entities can use these same resources to report possible violations or business conduct and integrity concerns.

You may also call the Ethics Line any time toll free at (888) 516-3901.



The Ethics Line is available 24 hours per day, 7 days per week, 365 days per year. When you contact the Ethics Line, you will be treated with dignity and respect. All calls will be treated in a highly confidential manner. You do not have to identify yourself. Caller ID is not used and an independent third party handles all calls placed to the Ethics Line.

The Company is fully committed to its non-retaliation policy meaning that it prohibits retaliation against anyone for raising a legal or ethical concern in good faith or for cooperating with an investigation.

If you call the Ethics Line anonymously, you will be given a unique identification number so that you can call back for a status report on your call. The Company is committed to listening to all reports and investigating all good faith reports of wrongdoing. When necessary, the Company will intercede in perceived ethical or business conduct issues. In the event you identify yourself, but do not want your name revealed further, Allina Health | Aetna will protect your identity to the extent reasonably possible. As an alternative to calling, you may contact the Ethics Line in other ways:

- Confidential email address: Ethics.BusinessConduct@CVSHealth.com
- Use the web form found at: www.CVSHealth.com/EthicsLine
- Confidential fax: (847) 559-3835
- Confidential mailing address:
 - Ethics Concerns
 - One CVS Drive
 - Woonsocket, RI 02895

For further details and more specific direction, consult the Company's policies and procedures..

Privacy & Information Security Incidents

If you believe or know that any sort of improper or unauthorized access, use or disclosure of any personal information including Personally Identifiable Information (PII), Protected Health Information (PHI), or other information about an individual, you may speak confidentially to a Privacy Advisor/Investigator through one of the contacts below or please submit through the Ethics Line.

Privacy Office (Legal Department)
One CVS Drive
Woonsocket, RI 02895
(866) 443-0933
PrivacyOffice@CVSHealth.com

Investigations

The Company investigates all good faith reports of wrongdoing. If you are asked to participate in an internal investigation of misconduct or unethical behavior, you are required to cooperate.

To adequately review an allegation, investigations can sometimes be lengthy. Be patient if you do not get an immediate response from the Compliance Department.



Ethics Line

(888) 516-3901

Ethics.BusinessConduct@CVSHealth.com

Information Governance & Privacy Operations

(866) 443-0933

PrivacyOffice@CVSHealth.com

Consequences of Wrongdoing

On and off the job, Allina Health | Aetna expects all colleagues to comply with the law and treat other people with respect, honesty and courtesy. Disruptive, unproductive, immoral, unethical or illegal actions are NOT acceptable at Allina Health | Aetna. A failure by any colleague to comply with laws or regulations governing Allina Health | Aetna business, this Code or any other Allina Health | Aetna policy or requirement, may subject Allina Health | Aetna and the colleague(s) involved to civil and criminal penalties or prosecution. Non-compliance includes failure to properly supervise subordinates to prevent and detect misconduct. It also includes knowing about violations but failing to report them.

Allina Health | Aetna sanctions colleagues at all levels of the organization for participating in, encouraging, directing, facilitating or permitting non-compliant activities. The Company is committed to consistently undertaking appropriate disciplinary action to address non-compliance and deter future violations, and to that end, compliance-related disciplinary actions are fairly and firmly enforced. Disciplinary action may be in any form, up to and including termination of employment, and if warranted, legal proceedings.

The following are examples of some, but not all, forms of rule violations or misconduct that may result in discipline up to and including termination of employment:

- Theft or inappropriate removal or possession of Company property;
- Falsification of timekeeping records or other Company records;
- Possession or working under the influence of alcohol or illegal or non-prescribed drugs;
- Insubordination;

- Engaging in or threatening violence against colleagues, customers, vendors or others a colleague may interact with on behalf of the Company;
- Conduct that violates Equal Employment Opportunity, Affirmative Action, Anti-Discrimination, Anti-Harassment, and Anti-Retaliation laws;
- Excessive absenteeism or tardiness;
- Unauthorized use of telephones, Company communication services and equipment or other Company-owned equipment;
- Negligent or improper conduct leading to damage of property, harm to others or safety hazards;
- Possession of dangerous or unauthorized materials such as explosives, firearms or weapons in the workplace;
- Failing to comply with the rules and limitations regarding gifts and solicitation from those with whom Allina Health | Aetna does business as described in the Company's policies and this Code
- Unauthorized use or disclosure of confidential and proprietary Company information, confidential customer information or member information; and
- Violation of Compliance policies or procedures resulting in non-compliant behavior.

... Allina Health | Aetna expects all colleagues to comply with the law and treat other people with respect, honesty and courtesy.



APPENDIX

Appendix A

Avoiding Conflicts of Interest

When making business decisions, we must always consider what's in the Company's best interest. A conflict of interest may exist if your personal interests, activities, or relationships make it hard to perform your duties for The Company objectively and effectively. Even the appearance of a conflict of interest may damage the Company's reputation. We expect our employees, officers and directors to avoid real or apparent conflicts of interest.

Examples of conflicts of interest

You may have a conflict of interest if you, a family member, or a member of your household:

- Has a financial interest in any business, nonprofit, or government entity that is a customer or supplier, or that otherwise does business with our Company, or is one of our Company's competitors.
- Performs work (as an employee, officer, director, consultant or agent) for any of the above entities.
- Works, or serves as an officer, director or advisor, for a nonprofit or political organization with interests that intersect with our Company's businesses or with our position on a public policy.
- Benefits personally from opportunities or resources that came to you as a result of your work at our Company.
- Uses company time or assets for personal use or outside activities.
- Has an outside job or interest that interferes with your ability to do your job.
- Acquires a significant ownership interest (more than one percent [1%]) in any business other than a privately held family business.
- Works for or manages (directly or indirectly) someone with whom there is a close personal relationship (e.g., spouse, family member, close friend or significant other).
- Holds, or is running for, public office.

If you believe you have an actual or possible conflict of interests, report it to your manager and seek guidance from your Compliance Officer to determine whether you should report the situation by updating your Code of Conduct Acknowledgment Form with the information and forwarding it to your Compliance Officer. Your

disclosure will be reviewed by trained compliance personnel, and you will receive appropriate guidance.

Directors/Officers should report possible conflicts to Compliance or legal contact. They will consult with the Chairman of the Board or other members of the Board of Directors, as appropriate.

No employee may assume a position as a director, officer or related position with a for-profit business without prior approval. Before seeking or accepting such a position, you must report the proposed affiliation to your Compliance Officer.

As a Director, you may have a conflict of interest if you, a family member, or a member of your household:

- Takes an action or has an interest that makes it hard to perform your duties for The Company objectively and effectively.
- Receives improper personal benefits because of your board position.

The Secretary of the Board must review for possible conflict situations such as:

- Any proposed director or other affiliation with a for-profit organization.
- Any proposed transaction involving the Company or a subsidiary where a director has a direct or indirect material interest.

Disclosure to customers

Working with brokers and other producers may lead to situations that could create real or apparent conflicts of interest. We believe it is best for our customers, producers and the Company when our customers understand our financial arrangements with producers. Ask your Compliance Officer or legal contact if you have questions.

Understand and follow the Code and Company policies and procedures.

Loans and guarantees of obligations

The Company may not make loans to, or guarantees of obligations of, directors, executive officers and their families.

Loans to, or guarantees of obligations by the Company of, other officers and employees may create conflicts of interest. They must be approved in advance by the CEO, or someone appointed by the CEO.

Q&A

My uncle owns a maintenance company that does excellent work at a very fair price. May I recommend his company to work for us?

You may recommend that your relative's company be considered, but you must disclose your relationship at the time you make the recommendation. Normal bidding procedures must be followed. If your job would involve negotiating or administering the contract involving your relative, you may not recommend him or use your influence to have his company chosen for a job; nor may you be involved in any way in the negotiation process.

My wife is an employee benefits manager for a Company customer. I am a customer service representative. Is this a conflict of interest?

It could be. Report the relationship to your manager and Compliance Officer. To avoid the appearance of a conflict, you should not be involved in matters related to your wife's company, and you should never discuss company confidential information with your wife.

I am a claims processor. I have a job offer to help a health care provider keep records on weekends. Can I accept the job?

Since you process claims for us and your weekend work may include submitting claims or handling claim files, there is a good chance of a real or apparent conflict of interest. Report the job offer to your manager and Compliance Officer.

Even if it is determined that accepting the outside position is not prohibited, you must consult with Compliance to avoid even the appearance of a conflict of interest. Compliance will share appropriate guidelines to help you out. And, if you do accept the position, you also must enter this information in your Code of Conduct Acknowledgement Form.

Appendix B

Gifts, Hospitality and Entertainment

Giving and receiving business gifts have long been considered part of good business etiquette. Of course, we want to project a positive image in the marketplace. However, we also need to make sure that our decisions are not influenced by favoritism or other inappropriate motives.

Never give or take a gift that could be perceived as a bribe or an attempt to influence business decisions. Bribery is illegal and prohibited by policy. See the 'Bribes and other illegal payments' section of this Code for more details.

The safest course of action is not to give or receive any gifts at all. However, circumstances may arise where that's not possible. If you must give or receive a gift, inexpensive or promotional items are appropriate if the item is widely available to others and if the exchange is legal. Even inexpensive gifts should not be given or accepted if they are intended as, or could be perceived to be, a bribe or an attempt to influence business decisions. Ask your Compliance Officer or legal contact for help any time you are unsure about giving or receiving a gift.



Generally, gifts valued at more than \$50.00 to or from one person are not appropriate. Group gifts –those meant for, or received on behalf of, multiple people, e.g., a unit, office, department, etc. —can exceed this limit but must be reasonable in relation to the size of the group and purpose for the gift. Also, we cannot accept or give gift cards, cash, or cash equivalents, regardless of the amount. If you are offered or receive an expensive or inappropriate gift, politely refuse by explaining our Company's policy on accepting gifts.

Any gifts given must be accurately and fully disclosed in the appropriate expense report with enough detail to reflect the true nature of the expense and the full names and business affiliations of those involved.

If you use a Company supplier or contractor for personal purposes, you must pay full market value for the services and materials. You may not accept discounts or preferential treatment offered to you because of your position at the Company unless the same treatment is offered openly to all of our employees.

Special rules apply to exchange of gifts, travel and entertainment with government employees and public officials. These rules are very restrictive and are explained more fully in **Appendix C**, Government Contracts.

Even inexpensive gifts should not be accepted if they might be seen as a bribe or an attempt to influence business decisions.

Examples of Business Gifts

Generally Acceptable	Generally, Not Acceptable
Logo mugs, t-shirts, pens, calendars	Jackets, wristwatches, electronics, jewelry
Flowers or gift baskets to be shared with other employees	\$100 bottle of wine

Examples of Business Hospitality and Entertainment

Generally Acceptable	Generally, Not Acceptable
Inexpensive general admission tickets to regular season sporting events with supplier if business will be discussed.	Expensive, hard to obtain tickets to playoff tournaments or series.
A round of golf with supplier if business will be discussed.	All expenses paid vacation at a golf resort
Travel expenses in connection with a speaking engagement	Payment for the speaking engagement
Sharing a taxi to a trade show	Using a supplier's ski chalet for the weekend
Dinner and a show provided to all presenters at a conference	Tickets to the theater for you and your partner

Business hospitality, entertainment, travel and meals

The Company pays your travel and related expenses, as permitted by our Travel Policy, outlined in the Employee Handbook. In general, others should not pay for these costs.

You may occasionally offer or accept meals or entertainment offered in conjunction with meetings to discuss Company business. At least one employee must be present at each such event. Lavish, expensive, or exclusive meals and entertainment are not acceptable because they may be perceived by others as a bribe or an attempt to influence business decisions. Consult with your Compliance Officer or legal contact, if you have questions.

The Company will pay for business-related hospitality offered to others if permitted by our policies, and anti-bribery or other laws. Any such expense must be recorded accurately and with enough detail to reflect the true nature of the expense and the full names and business affiliations of those involved.

On occasion, it may be acceptable to host or attend a celebratory dinner or function with business partners to mark the end of a project or a deal; however, the celebration must be a one-time event, reasonable and appropriate to the occasion and occur shortly after the project or deal concludes. For example, it would be acceptable for Company personnel to attend a celebratory dinner sponsored by a business partner two weeks after the successful completion of a project or transaction.

Generally, it is not acceptable for either the Company or an outside party to pay for travel, accommodations or related expenses for a spouse, family member or other companion in connection with your business travel.

Special rules apply to exchange of gifts, travel and entertainment with government employees and public officials. These rules are very restrictive and are explained more fully in **Appendix C**, "Government Contracts."

Never give or take a gift that could be perceived as a bribe or an attempt to influence business decisions. Even inexpensive gifts should not be given or accepted if they may appear to be an attempt to influence business decisions.



Honoraria and fees from others

Our employees may be asked to participate in professional activities, professional forums or surveys that are related to the Company or our business interests. For example, you may be asked to serve on a committee or make a speech. You may not be paid a fee (often referred to as an honorarium) for this work. In general, you may accept an offer to cover reasonable travel and lodging costs as long as other committee members or speakers who are not Company employees are treated equally.

Q&A

May I give a supplier a gift basket with fruit and cookies to celebrate the end of a project?

The best approach is to give no gift at all. If business custom and the circumstances are such that you feel you must give a gift, be sure it's just a token (i.e., something with a value less than \$50). You may give this type of gift so long as giving it does not violate any laws or policies, including the policies of the supplier's company. You should get approval for this gift from your manager before you present it. Be sure that its expense is disclosed accurately and fully in your expense report.

A company that I use to arrange events offered me a discount on catering services for my family party. May I accept the discount?

Personal discounts that are offered to you because of your position with the Company are considered gifts and must be refused. However, if this discount is available to all of our employees, it may be acceptable. Talk to your manager, Compliance Officer, or legal contact if you need help on a specific case.

A supplier offered me tickets to a World Cup game. May I accept the tickets?

No. Whether the tickets were offered for your personal use or in conjunction with a business meeting, this type of offer is expensive and may be viewed by others as an attempt to influence business decisions. Consult your Compliance Officer or legal contact to determine whether it would be OK for you to pay the supplier the fair market value for the tickets.

I have been offered a fee of \$1,500 to speak at an upcoming conference. The conference sponsor also offered to pay for my travel and hotel expenses. The same offers have been made to all the speakers. May I accept these offers?

You may accept the offer of travel and hotel expenses, but you may not accept the fee.

Alternatively, you might suggest that the conference sponsor donate that money in the sponsor's name to a charitable organization.

Regulators will be on site doing their annual inspection of our books and records. Can we offer to take them to lunch or have lunch brought into the office?

There are often special rules in the U.S. and other countries regarding gifts and hospitality for government employees and public officials. In certain instances, offering even a modest lunch could be illegal. Therefore, to be safe, contact your Compliance Officer or legal contact.

The decision maker from a prospective self-insured customer asked if we would fly him to our office so that he could meet team members, view our facilities, and learn about our processes. Can we pay for his plane ticket?

Generally, this would be permissible since there is a legitimate business purpose for the visit that is directly related to promoting, demonstrating or explaining the Company's products or services and is unlikely to be viewed as a bribe (e.g., to gain or retain business or give the Company an advantage). The expenses covered may include reasonable lodging and incidental meals, but should not include entertainment, meals or other activity not directly related to the business purpose. There are more stringent rules relating to Government and International customers. For additional information, consult with your Compliance Officer or legal contact.

Appendix C

Government Contracts

Our Company is a responsible and reputable government contractor. We work hard to properly administer the contracts we earn.

We strive to conduct these activities in a way that fully complies with all applicable federal and state laws, regulations and ethics rules that apply. We hold ourselves to high standards of business conduct and integrity. We hold any subcontractors involved in supporting our government contracts to the same standards.

U.S. federal and state laws impose stringent rules with substantial penalties for violations.

One of these sets of rules, the False Claims Act (FCA), imposes liability on any person or organization that knowingly submits a false or fraudulent claim for payment to the federal government or retains federal funds to which they are not entitled.

As a health care company, we must comply with the FCA. If you question the accuracy or completeness of data sent to any government, believe that our Company may have been overpaid by a government agency, or have any concern about any of our government business policies, practices or processes, promptly raise this concern to your manager, Compliance Officer or legal contact.

For other issues involving U.S. federal, state, local or municipal government, work with your Compliance Officer or legal contact.

Government contracts often include special rules that we must follow. If you work in an area that contracts with a government or supports a government contract, it is your responsibility to understand and abide by these rules.

Guidelines for government contracts

- We follow all laws that apply to government contracting and procurement. This includes all employment laws that apply to contractors, as well as anti-corruption laws such as the U.S. Foreign Corrupt

Practices Act. Laws, regulations and ethics rules vary by locality. Consult your Compliance Officer or legal contact with questions.

- We provide current, complete and accurate information for all government contracts. You and the Company may be liable for false, incomplete or misleading documents or statements.
- We never give or agree to give anything of value to government customers, employees or third parties to influence the award or renewal of a government contract. If you are uncertain about how to apply the law in your situation, contact your Compliance Officer or legal contact..
- Some government contracts require us to certify that we did not violate procurement laws or regulations in winning the contract. If you are asked to sign a certificate or disclosure related to a government contract, contact your Compliance Officer or legal contact before signing.
- Promptly contact your Compliance Officer or legal contact if any part of a government, including a U.S. state insurance department, contacts you on a new situation or matter.
- We comply with all requirements — often referred to as “revolving door” rules — for hiring former government officials. Contact your Compliance Officer or legal contact before making an offer to hire a current or former government employee, as the situation must be analyzed, and a decision reached on what restrictions may apply.
- No gifts, entertainment, meals, lodging or travel may be provided to a government official or employee without prior approval from your Compliance Officer or legal contact.
- Rewards, incentives or promotional programs for Allina Health|Aetna Medicaid or Medicare Advantage or Prescription Drug Plan members are only permissible if they meet certain CMS requirements. Consult your Compliance Officer, or legal contact regarding questions on these CMS requirements.

Guidelines for government contracts

- We are committed to having an effective Medicare Compliance Program which is based upon Centers for Medicare & Medicaid Services (CMS) guidance and the Federal Sentencing Guidelines. This program is prescribed within our Medicare Compliance Plan and associated Medicare Business policies and procedures. In addition, Medicare Compliance policies and procedures are distributed to our Medicare first tier, downstream and related entities (FDR) through FDR training. We expect you to participate in and support this program as necessary. This Code is the underlying framework for our Medicare Compliance Program and associated policies and procedures. For our government contracts (e.g., Medicare, Medicaid), we are prohibited from employing or contracting with

persons or entities that have been excluded from doing business with the Federal Government. If you are on either of these lists, you should report it immediately to your Compliance Officer or the Ethics Line. Our Medicare products are governed by various regulations, including Title XVIII of the Social Security Act; Code of Federal Regulations sections 42CFR 422 and 423; and sub-regulatory guidance released by CMS (e.g., HPMS memos, manuals). comply with the sanction and debarment screenings of the U.S. Department of Health & Human Services Office of Inspector General (OIG) and General Services Administration (GSA) Systems of Award Management (SAM).

U.S. federal government contracts

Follow the laws, rules, regulations and requirements of contractor conduct in the Federal Employees Health Benefits Program (FEHBP), Medicare, Medicaid and other U.S. government programs.

- All employees who directly or indirectly administer and/or deliver Medicare-related services must complete mandatory annual training and initial training.
- Follow the rules on recruiting and hiring current or former federal workers. Your legal contact or Compliance Officer must give approval before you talk to such individuals about working at the Company.
- Notify your legal contact Compliance Officer right away if you have been debarred, excluded or suspended from working with any government sponsored program. This includes Medicare and Medicaid. You must also tell them if you know of any other reason why you might not be permitted to perform work related directly or indirectly to a government sponsored program, or if you know of anyone who works for or is affiliated with the Company who is in this situation.

Q&A

One of my municipal customers has asked that we contribute to a local charity event to benefit the town's firefighters. Is there any reason we can't do that?

There might be and, therefore, you need to check with your Compliance Officer or legal contact. Government plans are often subject to very broad restrictions about

soliciting or receiving payments from suppliers, particularly payments that might be seen as influencing the award or renewal of business. Our Company strongly supports community involvement. However, any donation to or at the request of a government customer or prospect should be reviewed by your Compliance Officer or legal contact to determine whether it is allowable.

We are going to hire a former public sector person to help us respond to a state RFP and pay her a fixed fee with success bonus if we get the business. Is this okay?

Increasingly, former government officials are subject to "revolving door" restrictions related to dealings with their prior employer. Therefore, it must be determined if and how these rules apply to your prospective hire prior to engagement. Also, it is Company policy not to engage procurement consultants on a contingency fee basis. Consult with your Compliance Officer or legal contact before engaging any procurement consultant to work in the public sector.

I have an appointment to meet with an official from the federal government agency we are seeking to do business with. May I take her to lunch after the meeting? Can I leave her with a logo pen to keep us fresh in her mind?

Generally, government entities have specific rules around accepting gifts (of any size or significance) from a supplier.

So, before you extend the luncheon invitation or give the logo pen, consult with your Compliance Officer or legal contact.

The RFP for a potential government customer includes one required item that we cannot accommodate. I hate to have this one item jeopardize our chances to win this account. Can I just indicate in the RFP that we are able to provide the item and worry about the consequences later?

No. We should never make a commitment that we cannot meet and must be diligent, thorough, and honest in all of our business dealings. Failure to do so is not only unethical; it might also be considered a violation of the False Claims Act. Possible consequences for violation of this law include civil and criminal penalties.