



**BENEFITS & CARE**  
INSURANCE BROKERS

# **CODE OF CONDUCT**



**OUR PRINCIPLES ARE THE HEART OF OUR FAMILY**

At Benefits & Care, our top priority is to provide optimal health insurance coverage for people of all ages. Our mission statement is centered around offering accurate and essential information to our members and potential clients, enabling them to make well-informed decisions. To achieve this goal, we are committed to upholding the highest level of ethical conduct and ensuring complete client satisfaction. Our code of conduct reflects the fundamental values that guide our organization.

**Purpose.**

Adhering to our code of conduct helps ensure that we act with integrity and professionalism in order to pursue the objectives of our organization while staying in compliance with applicable regulations and Federal laws. All employees should strive to maintain our high standards of ethical behavior, treating colleagues and members with care and respect. Any behavior contrary to these values, such as discrimination, harassment, or dishonesty must be promptly reported through appropriate channels. We aim for our family to treat each other with courtesy and sensitivity, maintaining a professional work environment that is free of harassment and discrimination.

**Policy & Scope.**

Our policy specifies what we expect from everyone in our organization in terms of how they should treat our members, their coworkers, and the organization as a whole. Our responsibilities to the federal government and the regulations governing the Medicare program are also outlined, and of utmost importance, in this code of conduct.

Our code of conduct entails important standards of behavior for everyone within our organization. All employees are expected to read the code and ensure that their conduct complies with the values expressed in it. This policy applies to all employees, regardless of the employment agreement or rank, to all business partners, and associates. Any violations of the code should be reported promptly following the procedures which will be discussed further in the paper so that corrective action can be taken by management.



**Our basic principles and fundamental values help us daily in our growth as a company and as the family that we are:**

- ◆ **Responsibility**

By ensuring we act with responsibility, integrity, and transparency in all interactions with our members, we build trust in our health insurance services. This means clearly communicating all applicable fees, coverage limits and exclusions before providing treatment.

We can also demonstrate responsibility by seeking continuous improvement. Regular internal reviews of our processes, performance metrics and member feedback help identify areas for progress. Suggestions from employees are welcomed and evaluated fairly. Acting on these opportunities to enhance the experience for our members shows we take our role seriously and are committed to delivering the best possible outcomes.

Through responsibility, we honor our mission at Benefits & Care - to provide essential information, options and support that enable better health decisions. This creates optimal value for members who depend on us, while also motivating our employees and strengthening relationships with providers. Most importantly, it allows us to fulfill our purpose of improving people's health and wellbeing through accessible and reliable insurance services.

- ◆ **Efficiency**

Efficiency is another important principle, enabling us to serve our members with the information, resources and tools to make better decisions. This means streamlining internal processes wherever feasible, in order to provide an exceptional service that enables members to find the maximum benefit out of their insurance plan while meeting their priorities and needs.

Through a sensible approach, efficiency supports - rather than undermines - our mission of delivering tailored healthcare solutions to individuals. We empower our employees to identify



opportunities for improvement with these guardrails in mind. Any changes proposed must enhance, not diminish, the experience for our members who rely on Benefits & Care to navigate complex healthcare options.

♦ **Teamwork**

Teamwork underpins everything we do at Benefits & Care. By working together towards our mission, we multiply our ability to serve members effectively. We seek diverse perspectives and backgrounds within our team, recognizing that a variety of ideas and experiences leads to the most creative and impactful solutions.

When disagreements arise, we approach them as opportunities for growth. We listen actively to understand each other's perspectives, and strive for the wisest course of action rather than a "winning" position. Compromise and adjustment are signs of maturity, not weakness, as we optimize outcomes of our work together.

In all our communications, we assume good faith and good intentions from our colleagues. Humor, when appropriate, helps foster goodwill and camaraderie. But we remain sensitive to potential misunderstandings and refrain from language that could offend.

Teamwork extends beyond any single interaction, department, or role. We recognize our interdependence across the entire organization to fulfill our mission. With open minds and generous spirits, we collaborate to provide the best possible experience and value. United by this shared purpose, we reach excellence in every edge of the organization through the combined efforts of a highly engaged and capable team.

♦ **Loyalty**

Loyalty is more than simply following procedures or avoiding conflicts. True loyalty means we embrace the spirit of our work at Benefits & Care, always acting in service of our mission and our members.



This requires discretion alongside dedication. When processes break down or changes are needed, we advocate for improvements with humility and respect. We give the benefit of the doubt to our colleagues, acknowledging that good faith underlies most actions and decisions.

Our loyalty lies first with our members and our mission. With this north star guiding us, we can productively critique policies or practices that fall short. We do so directly but diplomatically, focusing on outcomes rather than issues.

Above all, we remain steadfast in our commitment to helping members navigate health care with dignity, transparency and compassion. This higher purpose unites us, inspiring loyalty to each other that transcends any immediate disagreement. We recognize our roles are merely means to an end - providing the best healthcare solutions for those who count on us.

So long as we remain devoted to this purpose, we will find the wisdom and will to resolve tensions constructively. Our loyalty ultimately belongs to those we serve, and to the values that motivate our best work on their behalf.

♥ **Honesty**

Honesty remains the cornerstone of trust within our organization. We speak plainly and transparently with each other, in service of our common goals. This requires more than just avoiding lies - we actively cultivate an atmosphere of openness and truth-telling, of confidence in our team.

When mistakes occur, we own up to them quickly and directly. We focus our energies on fixing problems, not placing blame. We listen attentively to understand uncertainties or concerns, knowing that true honesty often reveals gaps in our knowledge as well as our strengths.



Above all, we value candor in the spirit of improvement. We recognize that honesty does not always mean harshness, but can instead involve difficult conversations handled with grace. With humility and good faith, we welcome critical feedback as an opportunity for growth.

We speak honestly not to wound others, but to strengthen the connections and trust that allow us to serve our mission well. Truth-telling, tempered by empathy and goodwill, cultivates a culture of psychological safety where we can learn and innovate together. This makes us more resilient as individuals and, collectively, as an organization dedicated to enabling better health decisions.

- ♦ **Equalitarian and non-discriminatory treatment**

We uphold a culture of equalitarian and non-discriminatory treatment, where all voices and perspectives are heard with empathy and respect. We do not tolerate insensitive language, derogatory jokes or stereotyping of any kind.

When evaluating candidates or making decisions that impact others, we consider only merit and qualifications relevant to the role. We recognize that diverse backgrounds and perspectives enrich our work, and we strive to cultivate an environment where uniqueness is embraced rather than feared.

As part of our commitment to inclusivity, we are willing to re-examine our own potential blind spots and biases. We welcome feedback that helps us foster a more just and equitable workspace.

Above all, we treat each individual with dignity - listening attentively, responding thoughtfully and assuming the best of intentions. Common courtesy, civility and good will form the foundation of our relationships, enabling us to achieve our shared goals.

## **Procedures**

The code of conduct will be distributed to all employees, business partners and associates at the time of hire or incorporation into the company, in order to foster a positive work environment,



effective communication and respectful behavior among peers. By maintaining a human, compassionate tone in all interactions, we can nurture the cooperative spirit vital to our company's growth and each employee's wellbeing.

Every year, CMS establishes new guidelines, standards and regulations that go into effect. As an organization regulated by Federal laws, we commit to listening carefully and responding appropriately to ensure our culture continuously improves while staying in compliance and fulfilling the responsibility we have with the government and our members. For such a reason, the management team reviews the code of conduct annually, makes relevant changes, and updates and distributes it within 30 days of hire for new employees, when such changes have been made and for annual training to all employees.

### **Consequences of Code violations or non-compliance issues.**

Employees should model appropriate behaviors for contractors, temporary workers, and interns. They must provide clear expectations for conduct and promptly address instances that do not align with our values. If, at any given time an employee, business partner, or associate fails to comply with the expected conduct, or violates the Federal and State standards in any of the following cases, disciplinary actions will take place and such individuals may face termination:

- **If you do not follow this code of conduct.**
- **If you deliberately fail to report a violation of this code.**
- **If you fail to share information during an investigation.**
- **If you share confidential information with an unauthorized third party.**
- **If you retaliate, manipulate, or take any form of reprisals against colleagues who report incidents of non-compliance, misconduct, or violations of the law.**

### **Ways to report.**

Even if you are unsure whether a situation violates our policies, we encourage you to report it so we can investigate further. Both within and outside of the office, employees, business partners, and associates have a responsibility to abide by our Code of Conduct. You have a duty to report



any violations of this Code, our policies, the law, or the rules as soon as you become aware of them. If in need to report a violation or possible violation there are multiple ways to file a report, you may choose the reporting option that feels most comfortable.

**You can use one of the following options to report unusual behavior:**

- ♦ **Call our anonymous customer service line, where representatives will take down your report without asking for any identifying information. #888-868-6894**
- ♦ **Send a confidential email to our designated Compliance Officer (Sandra Vengoechea) [sandra@benefitsandcare.com](mailto:sandra@benefitsandcare.com) , who will keep your report and identity private, honoring the trust you place in us.**
- ♦ **Discuss the issue with your manager, knowing you are protected from retaliation under our non-retaliation policy.**
- ♦ **Email [compliance@benefitsandcare.com](mailto:compliance@benefitsandcare.com)**

To safeguard the identity of the employees and prevent any retaliation, each request, report, or participation in an investigation will be managed with the utmost confidentiality. As we work to uphold these policies, we also find ways to create a culture of openness and trust where you feel protected and safeguarded for fulfilling your duty as an employee. When we share our struggles navigating these issues, we foster greater empathy and understanding across the team.

**Conflict of interest.**

As members of this organization, we must be vigilant about potential conflicts of interest that could compromise our ethical standards. A conflict of interest arises when an employee's interests or obligations interfere with their ability to act in the best interest of the organization. To maintain our commitment to integrity and transparency, we must disclose any potential conflicts of interest and take appropriate steps to mitigate them.

Here are some examples of potential conflicts of interest:





- **Financial interests:** When an employee has a financial interest in a company with which the organization does business, it could create a conflict of interest. For example, if an employee owns stock in a company that is bidding for a contract with our organization, they should disclose this conflict of interest and recuse themselves from any decision-making related to the contract.
- **Personal relationships:** When an employee has a personal relationship with someone who is in a higher hierarchical range or does business with the organization, it could create a conflict of interest. For example, if an employee's spouse works for a supplier to our organization, they should disclose this conflict of interest and recuse themselves from any decision-making related to the supplier.
- **Outside activities:** When an employee has outside activities that could interfere with their ability to perform their job duties objectively, it could create a conflict of interest. For example, if an employee serves on the board of a nonprofit organization that receives funding from our organization, they should disclose this conflict of interest and recuse themselves from any decision-making related to the funding.

To mitigate potential conflicts of interest, we must:

- Disclose any potential conflicts of interest to our supervisor or Compliance Officer.
- Recuse ourselves from any decision-making related to the potential conflict of interest.
- Seek guidance from our supervisor or Compliance Officer if we are unsure whether a potential conflict of interest exists.
- By taking these steps, we can maintain our commitment to ethical conduct and ensure that we act in the best interest of the organization at all times.



**Fraud Waste and Abuse (FWA):**

As an organization committed to upholding the highest standards of ethics and transparency, we must remain vigilant in identifying and reporting any instances of fraud, waste, and abuse (FWA) that may occur.

**Fraud:** Medicare fraud refers to the act of knowingly and willfully devised a scheme or artifice to defraud any health care benefit program or to obtain money or property using false or fraudulent pretenses, representations, or promises.

**Waste:** Medicare Waste refers to practices that lead to unnecessary costs for the Medicare Program, such as the excessive use of services. Waste is usually not attributed to criminal negligence, but rather the misuse of resources.

**Abuse:** Medicare Abuse refers to actions that have the potential to cause unnecessary expenses to the Medicare Program, either directly or indirectly.

It is our utmost priority to combat any instances of fraud, waste, and abuse (FWA). We recognize that these three factors can significantly undermine the trust that our valued customers and stakeholders have placed in us. Therefore, we are fully committed to taking every possible measure to prevent such occurrences and maintain the integrity of our company. We firmly believe that by working together, we can uphold our reputation for accountability and ethical conduct.

**To prevent FWA, we must:**

- Develop and implement policies and procedures that clearly define acceptable behavior and provide guidance on how to report suspected FWA.
- Train employees on how to identify and report suspected FWA.
- Encourage open communication and a culture of transparency where employees feel comfortable reporting suspected FWA without fear of retaliation.



- Regularly monitor and audit organizational activities to identify and address potential FWA.

If you suspect FWA is occurring, it is important to report it immediately. You can report suspected FWA through the following options:

- Call our anonymous customer service line, where representatives will take down your report without asking for any identifying information. #888-868-6894
- Send a confidential email to our designated Compliance Officer (Sandra Vengoechea), who will keep your report and identity private, honoring the trust you place in us.
- Discuss the issue with your manager, knowing you are protected from retaliation under our non-retaliation policy.

By remaining vigilant and committed to preventing FWA, we can maintain the trust and confidence of our stakeholders and ensure the continued success of our organization.



**Love what you do & work with transparency.**

Overall, by staying in compliance with this code of conduct we aim to uphold the highest standards of integrity through accountability, transparency, and ethical behavior at all levels of the organization. This will help us strengthen our bond as a family, provide a positive work environment that brings out the best in our employees and maintain the trust of our members, government agencies, and the public at large.

Although reporting misconduct is necessary, we should handle such issues with sensitivity and respect for all parties involved. With adherence to our code of conduct, we can continue to operate ethically, lawfully, and in service of the common good.

Let these values guide us as we improve our policies and practices on an ongoing basis. With a spirit of cooperation and a commitment to governmental laws, we will sustain an environment where all employees feel secure in reporting issues, and where patrons feel secure in our services. We must progress intentionally and carefully, always to protect the rights and well-being of employees, clients, and the wider public alike.



By signing this document, I confirm that I have thoroughly reviewed the Code of Conduct for Benefits & Care LLC. I understand all the terms and conditions outlined in the document and agree to comply with them. I acknowledge my responsibility to adhere to the Code of Conduct and commit to fully complying with all the stipulations set forth in the document.

X \_\_\_\_\_

**Print Name:** \_\_\_\_\_

**Sign date:** \_\_\_\_\_

