



|| INTEGRITY®

  
**Cornerstone**  
Senior Marketing  
AN INTEGRITY || COMPANY

WE ARE  
**INTEGRITY**

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CODE OF CONDUCT  
For locations governed by CMS



## MESSAGE FROM **LEADERSHIP**

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Dear Colleagues,

Integrity... It's not just our name, it's who we are! It serves as the framework for all we do. We approach our business relationships with integrity and strive for the highest ethical standards in all aspects of our business. We wouldn't be where we are today without people like you, who take pride in what they do and hold themselves to high ethical standards and moral disciplines, and for that I would like to personally thank you!

Here at Integrity, we share five core values that best describe how we aspire to conduct ourselves and our business: Integrity, Family, Respect, Partnership, and Service. It's no surprise integrity is first on the list. To us, integrity means doing the right thing in a reliable and ethical manner, and it serves as the foundation for our other core values. Together, these core values define the fundamental principles expected of us in our day-to-day behaviors and decision-making. Please familiarize yourselves with them, and apply them in all you do on behalf of your organization and Integrity Marketing Group.

Our Code of Conduct is an important tool in guiding our behaviors and conduct. As we grow, we touch an ever-increasing number of lives. It is our responsibility to ensure those we do business with trust in what we do and what we stand for. Our business is rooted in offering world-class service, and we can't achieve that unless we do business ethically and with integrity. Please take time to read this Code of Conduct and your Policies & Procedures and apply them to all your business interactions.

Sincerely,

Bryan Adams

Co-Founder and CEO, Integrity Marketing Group



# KEY REQUIREMENTS



I am required to:	Where it's addressed:
Conduct business ethically and with Integrity	Page 6
Know organizational expectations	Page 6
Report and Conflicts of Interest	Page 8
Identify and Report any suspected or actual FWA	Page 9-11
Comply with all Laws and Regulations governing our industry	Page 11
Safeguard all Confidential Information I handle, access, or store	Page 13 & 16
Refrain from retaliating against Whistleblowers	Page 16



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# INTRODUCTION

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## About The Code

This Code of Conduct (the “Code”) is designed to promote honest, ethical, and lawful conduct by all employees, officers, directors, and business partners of Integrity Marketing Group that handle or access Medicare Advantage and Prescription Drug Plan business. Organizations that “handle” MA/PDP business are regulated by the Centers for Medicare and Medicaid Services (CMS). This Code is intended to facilitate understanding of Integrity’s standards of ethical business practices and to provide awareness of ethical and legal issues that may be encountered while carrying out your day-to-day responsibilities. All applicable employees are expected to read this Code, within 90 days of hire, upon revision, and annually thereafter.

Across the entire Integrity platform, we strive to do business with integrity and in the utmost ethical manner possible. By keeping our core values front of mind, we should never need to compromise our integrity or ethics in order to accomplish our mission.





## **Who is Integrity Marketing Group?**

Integrity is a shared services platform for a group of nationally recognized IMOs/FMOs.

The Integrity platform is comprised of industry leading organizations across the country. This consolidation allows us to bring better value, service, and training as we share best practices among ourselves to better serve Agencies and Agents. All of that translates to better support, personalized and segmented trainings and webinars, and an employee base that's ready to help deliver for our Agents.

## **Who are our Platform Partners?**

Our Partners include some of the biggest names in the Senior Market and have joined forces to become the nation's leading independent distributor of Life and Health Insurance products that focus on serving the Senior Market. One of the benefits of joining the Integrity Platform is having access to a robust and comprehensive Compliance Program that include Policies and Procedures and Code of Conduct. All employees, subcontractors and vendors of the Integrity Platform Partners are expected to adhere to these policies and to this Code of Conduct. A full list of the Integrity Partners can be provided upon request.



## Questions to ask yourself?

If confronted with a situation you're unsure how to handle, these questions might help:

- ▶ Am I following approved company practices or protocol?
- ▶ Am I causing harm to someone?
- ▶ Am I protecting the information of our clients, agents, associates, shareholders, etc.?
- ▶ Will my actions give the appearance of being illegal or unethical?
- ▶ Will my actions bring discredit to any co-workers, the company, insurance companies, or business associates?

## Does This Code Apply to Me?

**No matter what role you have, your decisions and actions affect the reputation and integrity of our Company.** Therefore, it is essential that each person take time to review this Code, understand it, and carry out its provisions.

## What is expected of me?

- Conduct business in an ethical manner with courtesy, trustworthiness, and dignity
- Respect those you work with by using high ethical standards in all business decisions
- Never make false or negligent statements or engage in activities that could damage or be detrimental to the image and/or integrity of our Company or its business affiliates
- Avoid conflicts between personal and professional interests
  - ▶ This includes a full disclosure to a responsible supervisor or your compliance department of any transaction or relationship that is, appears to be, or could become a conflict of interest
- Comply with all governmental rules and regulations that are applicable to our industry, including HIPAA Privacy & Security and CMS regulations
- Report violations of this Code to a supervisor or your compliance department.

 **INTEGRITY**



# CONFLICTS OF INTEREST

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A conflict of interest occurs when an individual's private interests, activities, or relationships make it difficult to perform your duties objectively and effectively. Even the appearance of a conflict of interest can be damaging to our reputation. We expect all employees, officers, and directors to exercise good judgment and the highest ethical standards in their business activities as well as in their private activities. Avoiding real or apparent conflicts of interest is critical to the integrity of our company because they can become a conduit for other illegal or unethical behavior.



## Examples of Conflicts of Interest:

*If you, a family member, or a member of your household:*

- Has an outside job or interest that interferes with your ability to do your job
- Uses company time or assets for personal use or outside activities
- Benefits personally from opportunities or resources that came to you as a result of your work
- Has a financial interest in any business, nonprofit, or government entity that is a customer of Integrity, or that otherwise does business with Integrity.
- Works for or manages (directly or indirectly) someone with whom there is a close personal relationship (for example, spouse, family member, close friend or significant other)

Having a conflict of interest is not necessarily a policy violation, but failing to disclose the conflict is a violation. If you believe you have a conflict of interest or are unsure about it, report it to your supervisor and seek guidance from your local compliance department.

**BOTTOM LINE:** Do not make business decisions based on personal interests or relationships.







# FRAUD, WASTE, & ABUSE

We are committed to detecting and preventing Fraud, Waste and Abuse (FWA) as it pertains to the Federal Medicare Programs. The Federal False Claims Act (“FCA”) and similar state laws prohibit knowing submission of false or fraudulent claims or the making of a false record or statement in order to secure payment from a government sponsored program. Employees of the Company have an obligation to report any ethical misconduct, including concerns about potential false claims, to the Compliance Officer or other appropriate authority. As set forth elsewhere in this Code any retaliation against any individual making a report of a violation of the Code is prohibited.

## What is FWA?

### FRAUD:

Intentionally submitting false information to the Government or a Government contractor to get money or a benefit. With Fraud, there is intent and knowledge of the wrongdoing.

### WASTE:

Practices that, directly or indirectly, result in unnecessary costs to the Medicare Program, such as overuse of services. Waste is generally not considered to be caused by criminally negligent actions but rather by the misuse or overuse of resources.

### ABUSE:

Abuse involves paying for items or services when there is no legal entitlement to that payment, and the provider has not knowingly or intentionally misrepresented facts to obtain payment. Abuse directly or indirectly results in unnecessary costs, improper payments, and payments for services that are medically unnecessary.

Though fraud and abuse may seem similar, the main difference between the two is that fraud is committed knowingly and willfully. For abuse, prior knowledge and intent are not necessarily required. Waste is the overuse of services or other practices that result in unnecessary costs to the healthcare system. Waste is not normally the result of criminally negligent or willful actions.





### **Examples of Medicare Fraud, Waste, and Abuse:**

- Defrauding or attempting to defraud the health care system
- Lying, using false pretenses, or making false statements or promises to get money from the health care system
- Using the identity of another person to defraud the health care system
- Misusing resources or services, which results in unnecessary costs to the health care system
- Taking any action that leads to a payment from the health care system that is improper for substandard care or for medically unnecessary services

**Everyone has a responsibility to report any suspected or actual FWA. Reporting of FWA may be done using the hotlines or methods listed in the Reporting section of this document.**



#### **BOTTOM LINE:**

If you suspect the actions of colleagues, agents, providers, pharmacies, etc. might constitute Fraud, Waste, or Abuse, it is your responsibility to report it.



# COMPLIANCE WITH MEDICARE **LAWS, RULES & REGULATIONS**

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All employees are required to comply with all the applicable laws, rules, and regulations that govern the Medicare industry. It is your responsibility to know and adhere to the applicable laws and regulations that impact our line of work; and also to understand them well enough to be aware of potential violations and when to seek advice. It is the duty of the employee to follow these guidelines and notify the proper authorities of any violations. These CMS regulations include but are not limited to:

## **ANTI-KICKBACK LAWS:**

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Prohibits the exchange, or offer to exchange, anything of value, in an effort to induce or reward the referral of business pertaining to the federal health care program.

## **FALSE CLAIMS ACT:**

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Imposes liability on persons and companies who defraud government programs by knowingly presenting a false or fraudulent claim for payment.

## **STARK LAW:**

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Prohibits physicians of a Medicare or Medicaid patient from making a referral to an entity providing designated health services if the physician (or an immediate family member of the physician) has a financial relationship with that entity.

## **WHISTLEBLOWERS:**

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Someone who reports suspected or detected misconduct that would be considered a breach of state or federal law, rules, or regulations; or is a violation against company policy. Federal laws protect whistleblowers from retaliation.



**BOTTOM LINE:** Obey the law and make ethical business decisions! If you suspect illegal or unethical activity report it.



# EXCLUDED & INELIGIBLE PARTIES

Carriers that hold contracts with the Federal government (i.e. MA/PDP Carriers), prohibit Integrity from employing or contracting with any persons or entities that have been excluded from doing business with the Federal government. Therefore, anyone handling or accessing MA/PDP business or client information will be screened against the Office of Inspector General (OIG) and General Services Administration System for Award Management (GSA/SAM) exclusion lists, as well as all applicable State exclusion lists. Exclusion lists are searched upon hire and monthly thereafter.

**BOTTOM LINE:** If you or anyone you know, that is employed or contracted by Integrity, are excluded from the Federal programs, you must disclose that information as soon as you are aware of it.





## Proper Use of Company

# RESOURCES & ASSETS



Resources and assets provided by your organization are intended for business use only and include tangible assets, such as products, equipment, and facilities; as well as intangible assets, such as corporate opportunities, intellectual property, trade secrets, and business information (including any nonpublic information learned as an employee, officer, or director of the Company).

Integrity and your organization have the right to monitor or review any information on an employee's computer or electronic device. Internet activity, email, and other electronic communication is also subject to monitoring and review. These tools may not be used to commit illegal acts or break company policies.

### Confidential Information

Through the nature of our business, you may have access to sensitive and/or confidential information. It is everyone's duty to guard against the inappropriate use, access, or disclosure of any sensitive or confidential information. We are considered a Business Associate under the Health Insurance Portability and Accountability Act (HIPAA), so therefore, we must comply with the regulations imposed therein. Please see your Partner's Policy and Procedure documents to learn more about HIPAA and your responsibilities concerning the protection of sensitive and confidential information.

**BOTTOM LINE:** Use company resources for business purposes only and protect the sensitive and confidential information you handle.



# Safe, Healthy & Affirmative **WORKPLACE**

We have a commitment to maintain a work environment free of sexual, racial, or other harassment and from acts or threats of violence. Our policies are designed to promote fairness and respect for all individuals and to value diversity and inclusion. Discrimination, harassment, or retaliation will not be tolerated. We are also committed to a drug free work environment. Unlawful possession or consumption of any drug or controlled substance is strictly prohibited and is not allowed on company property.

**BOTTOM LINE:**

Treat co-workers and customers with respect and refrain from discrimination, harassment, or retaliation.







# REPORTING CONCERNS

## How Do I Report Concerns?

- Go to your Supervisor
- Contact your local Compliance Department (ex: [compliance@businessunit.com](mailto:compliance@businessunit.com))
- You can also report anonymously through Lighthouse:
  - ▶ 833-860-0011
  - ▶ [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)
  - ▶ [www.lighthouse-services.com/integritymarketing](http://www.lighthouse-services.com/integritymarketing)

**Reporting concerns can be made by any of these methods 24 hours a day, 7 days a week.**

**FWA concerns can be directly and anonymously reported to:**

### Medicare Fraud Tip Line:

1-800-447-8477 (1-800-HHS-TIPS)

TTY Users: 1-877-486-2048

### Report FWA online:

<https://www.cms.gov/About-CMS/Components/CPI/CPIReportingFraud>





# CONFIDENTIALITY & NON-RETALIATION

You may be reluctant to report a violation of this Code, we get it! Rest assured that reports are welcomed and encouraged. Reporting your concerns reflects our collective commitment to open, honest communication. We are committed to protecting your privacy to the best of our ability if you report a violation, raise a concern, or are involved in a complaint or investigation.

## **Integrity and all its platform partners prohibit intimidating or retaliating against anyone who, in good faith:**

- Makes a complaint or reports a violation to Integrity or any law enforcement or governmental agency
- Cooperates or helps with a government or internal investigation
- Conduct self-evaluations, audits, remedial actions or other activities in support of our compliance program
- Provides information to the government or Integrity about a breach of law or related policy

### **BOTTOM LINE:**

Do not retaliate against those who report compliance concerns or are helping with investigations into compliance matters.



# DISCIPLINARY STANDARDS

## What can happen if this Code isn't followed?

Failure to follow this Code, as well as to comply with Federal, State, and local laws, as well as Integrity's or Integrity Partner's policies and procedures may result in punishment up to and including termination of employment.

## What types of actions could warrant disciplinary action?

- Not following the guidelines in the Code or Policies and Procedures.
- Breaking a law or regulation applying to Integrity or Integrity Partner business
- Failure to report violations of this Code, other laws and regulations, or policy
- Providing false information in connection with an investigation
- Intimidation or retaliation against an associate who reports suspected violations

**BOTTOM LINE:** Disciplinary actions will be taken when warranted.

