

# Ethics Every Day

for Contracted Health Care Providers and Business Partners



I am the key  
to integrity



**This document is reviewed annually and contains updates over the 2017 version.**

**It is important that I read this and, if I'm an administrator, provide this publication or an updated, materially similar document to all employees and business partners who support Humana's Medicare and/or Medicaid products as part of our relationship.**

## I have help

From my manager, my organization, Humana and the Ethics Help Line **1-877-5-THE-KEY**, I have the support I need if I encounter sticky situations.

## I know what to do

The guidelines in this book, along with Humana's policies and resources, help me understand and follow the rules.

## I am safe from retaliation

When I suspect a violation, I know I will not get in trouble for speaking up.

**Humana**®

# We are all the key to integrity



## Humana's dream is underscored by Humana's values

- Inspire health
- Cultivate uniqueness
- Rethink routine
- Pioneer simplicity
- Thrive together

We encourage your organization to consider these perspectives in its approach to the ongoing fulfillment of obligations to Humana.

Dear valued partner,

We appreciate all you do to maintain the highest ethical standards in your business interactions. Your actions enable us to do the same, while also contributing to our combined success.

Humana's dream is to help people achieve lifelong well-being. Part of realizing that dream is a steadfast commitment to achieve the highest ethical standards, something we have been doing since we were founded more than 50 years ago. The values and ethical principles we share help us deliver a perfect experience. It takes all of us working together, living our values, taking ownership of our actions, and following state and federal legal requirements that govern our industry to create that perfect experience.

In this spirit, we offer you, your employees and contracted business partners an important part of our Enterprise Compliance Program: Ethics Every Day for Contracted Health Care Providers and Business Partners. This document outlines our program's standards of conduct requirements for you.

Our Enterprise Compliance Program will help you with questions or concerns. If you prefer, you can reach out to your leader, another leader outside your team or the independently staffed Ethics Help Line (**1-877-5-THE-KEY** or **[www.ethicshelpline.com](http://www.ethicshelpline.com)**).

Thank you for your continued partnership. When we do the right thing in the right way for the right reasons, we thrive together.

Sincerely,



Kurt J. Hilzinger  
Chairman of the Board



Bruce Broussard  
President and  
Chief Executive Officer



J. Gregory Catron  
Vice President,  
Associate General Counsel  
and Chief Compliance Officer

# Staying on track



## Key requirements

The locations of the key requirements from each section of this document are listed below.

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## Notable changes (with page number)

This overview has been provided to list the key points of notable changes and the sections in which they are detailed. Page numbers have changed through the entire document.

### **I am the key to integrity (1)**

Clarified that this document is reviewed annually, contains updates over the 2017 version and either this publication or an updated, materially similar document must be distributed.

### **Fraud, waste and abuse (8)**

Clarified that providing inaccurate diagnosis codes to Humana is an example of FWA.

### **Gifts, favors, job opportunities and entertainment (9)**

Clarified that allowable gifts for Medicare or Medicaid beneficiaries have yearly limits.

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Humana is ultimately responsible for ensuring the actions of those who support Humana business, including the actions of contracted health care providers and business partners, are compliant with applicable laws, rules and regulations.

## Key terms

I will see the terms below throughout this document, and they are defined as follows:

**Associate** – A Humana employee.

**Compliance Policy** – The Compliance Policy for Contracted Health Care Providers and Business Partners, a detailed listing of Humana's compliance requirements for health care providers and business partners and how to meet them, along with overviews of, and links to, resources and applicable laws and regulations.

**Health care providers and business partners** – Any non-associate contracted, directly or indirectly, to perform a business function or provide goods or a service for or on our behalf. These may also be referred to as first tier, downstream and related entities (FDRs). Some examples of business partners are delegated and nondelegated health care providers, delegated entities, pharmacies, sales agents, sales agencies, vendors, suppliers, contractors and delegates.

- Vendors and suppliers of administrative goods and services are considered business partners.

**Humana (or the company)** – Refers to Humana Inc. and its wholly owned subsidiaries.

### Terms specific to fraud, waste and abuse (FWA):

**Abuse** – Includes any action(s) that may, directly or indirectly, result in one or more of the following:

- Unnecessary costs to the health care system, including the Medicare and Medicaid programs
- Improper payment
- Payment for services that fail to meet professionally recognized standards of care
- Services that are medically unnecessary

Abuse involves payment for items or services when there is no legal entitlement to that payment and the entity supporting Humana (e.g., a health care provider or supplier) has not knowingly and/or intentionally misrepresented facts to obtain payment.

Abuse cannot always be easily identified, because what is "abuse" vs. "fraud" depends on specific facts and circumstances, intent and prior knowledge, and available evidence, among other factors.

**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 (18 U.S.C. § 1347).

**Waste** – Overutilization of services or other practices that, directly or indirectly, results in unnecessary costs to the health care system, including the Medicare and Medicaid programs. Waste is not generally considered to be caused by criminally negligent actions, but by the misuse of resources.

# Our expectations



These principles are intended as guides that reflect the collective good judgment and common sense of us all, not a comprehensive set of rules or legal advice.

**Q: What should I do if my supervisor or manager asks me to do something I think violates this document or related policies or is illegal?**

A: Immediately report the request to a level of management above your supervisor or manager, Humana's Ethics Office or the Ethics Help Line. The matter will be investigated promptly so you receive proper guidance.



## The bottom line

Leaders must foster an ethical and compliant culture.

## Who should read this document

This document is for everyone who performs a business function or provides a service for or on our behalf. It is not limited to those who define themselves as health care providers or business partners, but includes their employed and contracted staff and organizations serving them.

## Our principles

This document is closely aligned to the standards of conduct (Ethics Every Day) distributed to associates and available on Humana's website:

**<http://phx.corporate-ir.net/External>**

**File?item=UGFyZW50SUQ9MTg5MjY0fENoaWxkSUQ9LTF8VHlwZT0z&t=1**

Both versions reaffirm our commitment to integrity as the cornerstone of behavior for anyone who acts on our behalf. This means anyone from a member of the board of directors to the CEO to the part-time temporary worker, regardless of whether the person is an employee.

The guidelines in this document are meant to help all of us better understand what we believe to be in the best interest of our constituencies, including customers, members, patients, clients, associates, shareholders, those with whom we do business and the public at large. As a result, we will provide value, service and guidance to become the role model for the health care industry.

Therefore, it's important to conduct ourselves in an ethical, legal and above-board manner. The quality of health care providers' and business partners' products and services affects the quality of Humana's products and services. Understanding this commitment and willingness to raise ethical concerns are essential to the well-being of Humana's customers, members, patients and clients, as well as the success of both your organization and Humana.

## Keep in mind

No matter what the situation:

- Remember the ripple effect—your actions have an impact on everyone around you
- Don't forget it's OK to ask—if something doesn't feel right, use the resources identified in this policy to share your concerns

Our ethical principles are the framework for the Compliance Policy, which also integrates requirements outlined in the Medicare Managed Care Manual, Chapter 21, and Prescription Drug Benefit Manual, Chapter 9 guidelines published by the Centers for Medicare & Medicaid Services (CMS). Please refer to the Compliance Policy for how to align ethical behavior with compliance requirements.

## Leaders' responsibility

We expect leaders to set the example:

- Provide sufficient information to those supporting your organization to comply with laws, rules and regulations to meet obligations to Humana
- Foster a culture that encourages everyone to communicate concerns when they arise
- Never sacrifice ethical and compliant behavior in the pursuit of business objectives
- Have business ethics requirements for your organization, including a formal program for ethics, compliance and ongoing related training; you also may adopt this document



# I know what to do

## Four powerful principles steer us away from mistakes we never intended to make

- 1. Honesty and respect to all.** Act fairly and honestly with those who are affected by your actions, and respect and value those you serve by treating them the way you and they would want to be treated.
- 2. Compliance with laws and focus on quality.** Comply not only with the letter of all applicable laws, regulations and regulatory guidance, but also with the spirit of the law, regulation or regulatory guidance. Act in such a manner that the full disclosure of all facts related to any activity would reflect favorably on the company or you. Ensure everything is done right the first time and every time.
- 3. Responsibility for actions.** Adhere to the highest ethical standards of conduct in all business activities and act in a manner that enhances Humana's standing as a corporate citizen and ethical competitor within the business community. Pursue no business opportunity that requires violation of these principles. Communicate openly, place customers' needs first and act appropriately, according to Humana's values.
- 4. Responsibility for reporting violations.** All of us are responsible for reporting suspected ethical or compliance violations and issues. Humana promotes relationships based on mutual trust and respect and provides an environment in which a company practice can be questioned without fear of adverse consequences.

It is important to report to Humana any questionable activity because ethical violations are not always the result of an intentional disregard of ethical standards.

## Questions to ask yourself

If you're confronted with a situation that you're unsure how to handle, use these questions to guide your actions:

- Am I following approved company practices?
- Am I causing harm to someone?
- Can I defend my actions to my leader, co-workers, associates and the public?
- Am I appropriately protecting information about the company from disclosure to external or internal parties?
- Am I protecting the information of our customers, members, patients, clients, associates and shareholders?
- Am I living up to my personal code of behavior?
- Will my actions give the appearance of being illegal or unethical?
- Will my actions bring discredit to any co-workers, associate or the company if disclosed to the public?



### The bottom line

I must make ethical decisions and report suspected noncompliance.

### Phrases you hear, read or think may signal a problem

"It's just between you and me ..."

"Well, maybe just this once ..."

"Nobody will ever know."

"It doesn't matter how it gets done as long as it gets done."

"Everyone does it."

"What's in it for me?"

"Don't contact the Ethics Help Line."

"Remember, we didn't have this conversation."

"If they don't ask, don't tell."

# I have help



I can choose the option I feel most comfortable using.



**An abundance of resources is available to make you feel comfortable speaking up.**

Sometimes it's hard to report concerns or admit you don't know something. That's why Humana makes it easy to be heard.

## Resources

For raising issues, asking questions and reporting suspected violations:

- **Leader:** Ask your leader for advice
- **Other leadership:** Speak to the next level of leadership
- **Humana's Ethics Office:** Contact via email at [ethics@humana.com](mailto:ethics@humana.com)
- **Ethics Help Line:** Call **1-877-5-THE-KEY (1-877-584-3539)** or visit [www.ethicshelpline.com](http://www.ethicshelpline.com)
  - Available 24 hours a day, seven days a week
  - Calls are confidential and can be made anonymously
  - Calls will not be traced or otherwise identified
  - Staffed by trained, external non-Humana representatives
  - Reports are documented and forwarded to Humana's Ethics Office for review and determination of action, including referrals to internal departments for investigation
- **Special investigations referral:** Report suspected incidents of fraud, waste and abuse to SIU: **1-800-614-4126**, [siureferrals@humana.com](mailto:siureferrals@humana.com), or fax **920-339-3613** or contact the Ethics Help Line

## Privacy or security breaches\*

A Humana business partner with a signed Business Associate Agreement with Humana that identifies improper disclosure of or access to information or systems related to Humana, including, but not limited to, beneficiary or member information, must report it to Humana within five days of discovery. All information that should be included in the breach report is outlined in the Business Associate Agreement.

### Mail

Humana Inc.  
Privacy Office  
500 W. Main St.  
Louisville, Kentucky 40202

### Fax

**502-508-3700**

### Email

[privacyoffice@humana.com](mailto:privacyoffice@humana.com)

\*Due to the nature of these issues, reporting them anonymously is not an option.



## The bottom line

I must report suspected noncompliance.

# Fraud, waste and abuse (FWA)

**Humana has zero tolerance for any activity that constitutes fraud, waste or abuse.**

For more information on FWA, including additional examples, use the link below to access CMS' Medicare Parts C and D Fraud, Waste, and Abuse Training and Medicare Parts C and D General Compliance Training.\*

**[www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/ProviderCompliance.html](http://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/ProviderCompliance.html)**

\*As with all concepts discussed in this document, the CMS training also applies to Humana's Medicaid line of business.

The detection, correction and prevention of FWA are essential to maintaining a health care system that is affordable for everyone. State and federal law enforcement agencies are increasingly focused on investigating health care FWA.

**Examples of FWA include but are not limited to:**

- 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 identifying information of another person to defraud the health care system
- Misusing resources or services, which results in unnecessary costs to the health care system
- Providing inaccurate diagnosis codes to Humana
- Taking any action that leads to a payment from the health care system that is improper, for substandard care or for medically unnecessary services

Even if you don't intentionally lie or misrepresent facts, you could still be committing fraud, waste and abuse if you are paid by the health care system but are not actually entitled to the money.

**Requirement to report FWA**

Everyone who performs a function that in some way supports Humana business is required to report suspected FWA to one of the designated contacts in the "I have help" section on the previous page.



## The bottom line

I must be familiar with FWA concepts.

# Ineligible parties

The government requires us to refrain from contracting with or employing those who have engaged in certain types of activities. Such parties include health care providers and business partners, their employees and those they contract with to perform functions to meet obligations to Humana that have been or are:

- Convicted of a criminal offense related to health care
- Listed as excluded or otherwise ineligible for participation in federal health care programs\*
- Identified and listed on the Executive Order 13224 – Blocking Property and Prohibiting Transactions with Persons Who Commit, Threaten to Commit, or Support Terrorism
- Listed on either the Department of Health and Human Services' Office of Inspector General or the General Services Administration exclusion list\*
- Convicted of any felony involving dishonesty or a breach of trust (Violent Crime Control and Law Enforcement Act of 1994)

These individuals and their employees and those they contract with to perform functions to meet obligations to Humana are ineligible for any contractual relationship with Humana.

\*There may be instances where some person or entity was previously listed as excluded, but that status has been removed. In such a case, Humana should be contacted so it can determine whether the involved party(s) may support Humana.



## The bottom line

Those in leadership roles must not employ or contract with ineligible parties.



# Conflicts of interest

Having a conflict of interest is not necessarily a violation of this document, but failing to disclose the conflict to your organization is a violation. Humana's healthcare providers and business partners and those supporting them must disclose any conflicts of interest annually and if their status changes. If you are unsure of whether a relationship is a potential conflict of interest, you should disclose it so that it may be evaluated.

## Possible conflicts of interest

Personal, familial or business relationships that could interfere with your organization's ability to meet contractual obligations to Humana may be conflicts of interest.

Additionally, Humana associates must not engage in activities that compete with any of Humana's lines of business nor invest in entities they select, manage or evaluate as an entity supporting Humana. Health care providers and business partners must be sensitive to these relationships and avoid creating situations that could encourage a Humana associate to violate these policies.

A good general rule is to avoid any action or association that would be embarrassing to you, your organization or Humana if it were disclosed to the public, or that would be perceived as a potential conflict of interest or appear as improper.



### The bottom line

I must not make business decisions motivated by personal considerations or relationships.

# Gifts, favors, job opportunities and entertainment

## Health care providers and business partners:

- Should never offer or provide, directly or indirectly, anything of value—such as a job, cash, bribes or kickbacks—to any Humana associate, representative, customer or government employee.
- Are expected to understand Humana's business entertainment policies before offering or providing any Humana associate or representative any business entertainment. Business entertainment should never be offered to a Humana associate or representative under circumstances that create an appearance of impropriety.

Accepting or giving gifts, favors, travel and entertainment may create a conflict of interest with your obligations to Humana and may constitute a violation of law.

Gift giving or receiving that involves health care providers or business partners, is limited to \$50 fair market value or less in a year. Giving gifts to Medicare or Medicaid beneficiaries has stricter guidelines and limitations outlined in Humana policies. This also includes, but is not limited to, meals, favors, travel, tickets or entertainment, prizes, drawings, raffle winnings, gratuities and awards. These policies incorporate restrictions established by the government.

Gifts of money or cash equivalent are never permissible.



### The bottom line

I must refrain from discussing, giving or offering anything of value, including employment, to anyone on Humana's behalf, unless permitted by law or Humana policy.

Please refer to the Compliance Policy for anti-kickback and anti-inducement provisions that outline the kinds of items that can be given away, their value limits and to whom.

Email the Ethics Office at [ethics@humana.com](mailto:ethics@humana.com) with questions about gift cards and gift limits, including on a state or local level.

# Working with Humana customers



## Cultural competency

Health care providers and business partners who interact with Humana customers, including beneficiaries, must do so in a culturally competent manner. This includes:

- Understanding cultural differences and economic disparities in the populations you work with as part of your responsibilities for Humana
- Being knowledgeable about how to work with people from a variety of cultural and economic backgrounds and sensitive to any ongoing clinical challenges that may be in addition to the reason for their seeking treatment or guidance
- Being aware of your own cultural biases

To access interpretation services for Humana beneficiaries, call Humana or request the member provide the phone number listed on the member's Humana identification card.

## Safety and welfare

Health care providers and business partners must make every effort to protect the health, safety and welfare of the customer. This includes being aware of the signs and symptoms of the following:

- **Abuse** – e.g., physical, sexual or emotional
- **Neglect** – e.g., conduct that could or does result in serious physical or emotional injury
- **Exploitation** – e.g., use of a position of trust to knowingly deceive or intimidate, or deprive of resources, funds or assets

Certain populations, such as the elderly and disabled, are at increased risk for these situations.

## Reporting suspected abuse, neglect or exploitation

If a Humana customer is ever in immediate danger, call 911 or local police.

States may require me to immediately report suspected abuse, neglect and exploitation directly to the appropriate state agency(s). Additionally, any signs of the above must be reported to the Humana care manager, who will determine the appropriate next steps.



### The bottom line

I must treat Humana customers with respect and make every effort to protect their health, safety and welfare.

# I am safe from retaliation

We strictly prohibit intimidation and/or retaliation against any associate or health care provider or business partner who, in good faith:

- Reports an actual or suspected violation of ethical standards, Humana policies or procedures and applicable laws, rules or regulations
- or**
- Participates in the investigation of a suspected or detected violation

If you suspect such behavior, you must report it to the Ethics Help Line.

## Investigation of suspected violations

Humana promptly investigates any reported issues suspected of being violations of this document, Humana policies or procedures, or applicable laws, rules or regulations. All reported issues are treated as confidentially as possible, yet you may be contacted to provide additional information if you provided your name at the time of reporting. If contacted, you are expected to cooperate fully in any investigation of an alleged violation. If you want to remain anonymous when reporting an issue, please provide as much information as possible, at the time of reporting, to allow Humana to thoroughly investigate the issue.

When Humana determines it is appropriate, Humana will report any violations of the requirements in this document or Humana policies, Medicare program noncompliance, Medicaid program noncompliance, violations of law, criminal misconduct, any instances of abuse, neglect or exploitation, or FWA to the Centers for Medicare & Medicaid Services (CMS), CMS designees, other regulatory agencies, including state Medicaid agencies and/or law enforcement, as applicable.



### The bottom line

I must not intimidate or retaliate against anyone I interact with in performing my role for Humana. Suspected violations will be investigated.

# Disciplinary standards

Violation of this document and other policies and procedures could compromise Humana's integrity and reputation, and result in criminal or monetary penalties or disciplinary action. This disciplinary action may include, but is not limited to, retraining, issuance of a corrective action plan that is tracked to completion or termination of your organization's contract and, based on the violation, the matter being reported to the appropriate authorities.

Health care providers and business partners should promptly take appropriate disciplinary actions for employees and business partners found to be in violation, up to and including termination of contract or employment, and report such action to Humana. Humana may take additional action if deemed necessary.

### Examples of conduct that may result in disciplinary action

- Authorization or participation in actions that violate this document or Humana policies
- Failure to report a suspected violation of this document or Humana policies
- Refusal to report a suspected violation of this document or Humana policies
- Refusal to cooperate in an investigation of an alleged violation of this document or Humana policies
- Failure by a violator's supervisor or manager to detect and report a violation of this document or Humana policies, if such failure reflects inadequate supervision or lack of oversight
- Intimidation of, or retaliation against, an individual for reporting or participating in the investigation of a violation or suspected violation of this document or Humana policies
- Intentionally making a false accusation



### The bottom line

Disciplinary actions will be taken when violations occur.

# Integrity of company information



Health care providers and business partners must safeguard Humana information.

For those having a BAA with Humana, please refer to the separate **Humana Privacy and Security Policy Guidance** document that is provided with the BAA for more information on this topic.

## We are committed to

- Safeguarding information used to perform functions for or related to Humana. This includes following the privacy and security rules of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the more recent Health Information Technology for Economics and Clinical Health Act (HITECH), as should Humana health care providers and business partners. Links to these regulations are in the Compliance Policy.
- Providing accurate and truthful information in any transaction—it is required.
  - Of particular note, health care providers are responsible for submitting truthful, complete and accurate risk adjustment data, to Humana
  - For instance, when you submit risk adjustment data to Humana, Humana expects that it is always truthful, complete and accurate and that all diagnoses are appropriately documented in the medical record

## Policies and procedures

This commitment is reinforced by internal controls and procedures designed to detect and prevent, report, investigate and track inappropriate usage and disclosure of information, as well as illegal activities, in compliance with the Foreign Corrupt Practices Act.

Health care providers and business partners are expected to have policies and procedures in place to affirm the integrity of their organizations' information. Examples include:

- Privacy and security training program for employees and business partners
- Confidentiality agreements, where applicable
- A procedure for the required return/destruction of protected health information (PHI) if an agreement involving the support of Humana is terminated
- A procedure for restricting the marketing of PHI

If asked, health care providers and business partners have an obligation to provide accurate and complete information to auditors about the status of financial, operational and compliance risks and controls related to their business with Humana.

## Your concerns

Health care providers and business partners, or those who perform functions for them, who believe they have been asked to withhold information from auditors, or question the accuracy of any information, are required to immediately call the Ethics Help Line at **1-877-5-THE-KEY** or report their concern at **[www.ethicshelpline.com](http://www.ethicshelpline.com)**.

## Unauthorized disclosure

Humana's written approval must be acquired by organizations designated as business associates before any confidential Humana information may be provided to any contractor, including subcontractor and independent contractor, outside of the United States. Unauthorized disclosure of, or access to, confidential information, within or outside of an organization, may result in termination of contract and also may result in civil and criminal penalties.

## Reporting a privacy or security breach\*

If I am a Humana business partner with a signed Business Associate Agreement (BAA) with Humana, any identified breach by my organization must be reported to Humana within five days of discovery via one of the methods outlined in the "I have help" section on page 7. All information that should be included in the breach report is outlined in the BAA.

\*Due to the nature of these issues, reporting them anonymously is not an option.



### The bottom line

I must protect  
Humana information.

# Applicable laws and regulations

Humana's Compliance Policy provides more information on applicable laws and regulations that impact the relationship that my organization and I have with Humana.

Direct clarification requests to:  
**[compliance@humana.com](mailto:compliance@humana.com)**

## Corporate social responsibility

Our proactive commitment extends beyond compliance, as we are dedicated to making business decisions to improve the health and well-being of our members, our associates, the communities we serve and our planet.

For more information:  
**[Humana.com/about/corporate](https://www.humana.com/about/corporate)**

## Overview

There are many laws and regulations that impact Humana's operations that you and your organization should be familiar with to sufficiently fulfill contractual obligations to Humana. They involve but are not limited to:

- Prohibitions on inducing referrals or recommendations related to an item, service or plan enrollment paid for in whole or in part under a federal or state health care program. This could take many forms, such as gifts, rebates, etc.
- Filing or conspiring to file false claims.
- Retaliating against someone who reports suspected misconduct.
- Improperly using cash value options of a covered product to facilitate money laundering or finance terrorist activity.
- Requirements and restrictions regarding doing business with the government, with accrediting agencies, and foreign governments, contractors or consultants.
- Receiving contractor bid or proposal information that would give Humana an unfair competitive advantage.
- Giving, discussing or offering anything of value, including employment, to a procurement official.

Humana's compliance department should be informed of any allegation of a violation or citations alleging a violation from a governmental regulatory agency. The person receiving the notification should direct the request to Humana's Compliance department. This requirement also applies to health care providers and business partners if a violation occurs that involves Humana business. Email the applicable information to **[compliance@humana.com](mailto:compliance@humana.com)**.

Health care providers and business partners, their employees and those they contract with to perform functions to meet obligations to Humana must never:

- Destroy or alter any document or record in anticipation of a request for the document or record by a government agency or court
- Lie or make false or misleading statements to any government investigator
- Persuade or attempt to persuade anyone to provide false or misleading information to a government investigator

Humana's policy is to avoid even the appearance of impropriety. Related violations committed by health care providers, their employees or those they contract with to perform functions to meet obligations to Humana are punishable by fines and imprisonment, loss of government contracts and/or suspension or exclusion from participating in federal procurement opportunities.

## Environmental commitment

Humana is committed to conducting its business operations in an environmentally responsible manner and in compliance with all applicable laws and regulations. Health care providers and business partners are expected to support this commitment by:

- Operating in full compliance with both the letter and spirit of environmental, health and safety laws and regulations applicable to their businesses, including the integration of sound environmental, health and safety practices into their everyday activities
- Reporting any environmental, health and safety concerns in connection with their Humana business dealings
- Identifying opportunities to improve their environmental, health and safety programs
- Implementing emergency preparedness plans, if necessary



## The bottom line

I must follow all applicable laws, rules and regulations.



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**We stay** in the know and understand the consequences of our actions.

**We expect** our leaders to set the example.

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