



Code of Ethics

The Standards of Conduct for Employees, Board members, Providers, Vendors, and Business Partners of Affinity Health Plan, Inc.

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SECTION

1

Dear Fellow Employees, Board members, Providers, Vendors, and Business Partners:

Affinity Health Plan is committed to providing our Members with access to high quality medical care, while complying with ethical and professional business practices and all federal, state, and local laws and regulations. To ensure everyone has a shared understanding of what ethical, professional, and legal business practices are in the workplace, Affinity incorporates its Corporate Compliance Program and a Code of Ethics as guidance in our day to day operations.

The Code of Ethics is for all employees, regardless of position, as well as Board members, providers, vendors, and business partners who work at or with Affinity. The Code of Ethics, adopted by the Board of Directors, embodies our commitment to ethical, professional, and legal standards, and it helps us make the right choices when confronted with difficult decisions. Although the Code of Ethics may not address every situation, we rely on you to exercise good judgment to carry out the intent of this Code of Ethics. The Code of Ethics also identifies resources to help answer questions about appropriate conduct in the workplace. It is everyone's responsibility to act in an ethical, professional, and legal manner so your adherence to its spirit, as well as its specific provisions, is critical.

Please read the Code of Ethics carefully and completely. If you have any questions or concerns about the Code of Ethics, seek assistance from your supervisor, manager, director, Human Resources, the Operations Committee, the Compliance Officer or our external Ethics Line. You may reach the toll-free external Ethics Line at 1 (866) 528-1505.

On behalf of the Board of Directors and our Senior Leadership Team, I pledge that no retaliatory or intimidating actions will be taken against you for reporting a compliance concern, in good faith, or for your participation in any compliance investigation. We all have a personal obligation to identify issues and uphold the ethical, professional, and legal standards described in this Code of Ethics.

Thank you for your continued hard work and dedication.

Sincerely,

Michael Murphy
President - CEO

Affinity Health Plan is a not-for-profit, mission-driven organization. Our *Mission Statement* declares why the organization exists and what we are trying to accomplish. Our *Vision Statement* describes how we regard ourselves and how we want to be regarded by others. Our *Values Statement* expresses how we relate to each other, to the community and to the world. Our statement of *Success Principles* expresses how we translate our Values into action.

MISSION

The mission of Affinity Health Plan is to improve the health and well-being of its Members, their families, and their communities in collaboration with primary care providers.

VISION

Affinity strives to be the health plan of choice for its Members and its providers – known for assuring access to high quality, cost-effective care; delivering the best customer experience; and contributing significantly to achieving a patient-centered health care system.

VALUES

We recognize and accept the importance of shared personal values in achieving our mission, in increasing personal effectiveness, and in demonstrating our commitment to our Members, providers and employees.

The values that are most important to us are:

- Commitment to improving health and health care.
- Integrity and honesty in our dealings with others.
- Respect and caring for people.
- Partnership and collaboration with those who share our values and goals.
- Pride in our communities, our daily work, and our accomplishments.
- Pursuit of constructive change and innovation.
- Support and encouragement of personal and organizational achievements.

SUCCESS PRINCIPLES

Affinity's five principles for success are as follows:

1. **Commit** to our ongoing success.
2. **Respect** our customers; serve them well.
3. **Build** a performance-based culture.
4. **Deliver** on commitments to coworkers.
5. **Value** your personal health.

SECTION

2

Our Commitment to Ethics & Compliance

Integrity and honesty are core values of Affinity Health Plan. The purpose of the Compliance Program and Code of Ethics is to develop and continuously improve processes and behaviors that promote honest, ethical, safe and legal practices in all of our day-to-day operations.

The Code of Ethics is a resource to help guide each of us in handling both routine and unusual situations we may encounter in our workplace. Other resources that are available to answer specific technical questions and concerns include written policies and procedures, our supervisors, managers, directors and executives, the Human Resources Department, the Compliance Officer and the Ethics Line.

If you have a question or concern regarding a troubling workplace issue or practice, you should first try to resolve the concern through the existing chain of command starting with the person to whom you report. If necessary, you can bring the issue to higher levels of the organization or to the Human Resources Department. If you feel the problem is not resolved, at this level, or if you are not comfortable using these channels, you can contact Affinity's Compliance Officer at (718) 794-5729 or the external Ethics Line at 1 (866) 528-1505. The Ethics Line is a confidential service, available 24 hours a day, 7 days a week, staffed by trained professionals who are not Affinity employees. You may make your call anonymously, or, if you do identify yourself, your confidentiality will be maintained within the limits of the law.

To protect Affinity's reputation – as well as your personal reputation – you must promptly report illegal or unethical conduct to an appropriate company representative or the Ethics Line. Failure to report such issues or concerns violates this Code of Ethics and can lead to disciplinary action, up to and including termination. Good faith reporting of compliance issues is based upon the reporter's motivation for reporting a compliance issue. "Good faith" generally describes an honesty of purpose, freedom from intent to defraud, and generally speaking being faithful to one's duty or obligation.

Our Responsibilities

This Code of Ethics reflects our Mission, Vision, Values and Operating Principles, and helps us to have a clear understanding of the business, professional and personal ethics that are expected of us in the workplace. It applies equally to everyone, whether serving on the Board of Directors, employed by Affinity (paid or unpaid, regardless of position including volunteers and interns), or holds a business relationship with Affinity. The fundamental elements of the Code of Ethics are also shared with and communicated to our vendors and other associates working with Affinity Health Plan. All of us are personally accountable for our decisions and actions. We each must conduct ourselves in a way that preserves and

enhances the integrity of the organization and Affinity's reputation in the community. To do so, it is critical that we understand the laws, company policies and contractual obligations that apply to our specific area. And, we should never misuse our authority, whether for personal interests or to the detriment of Affinity.

Affinity relies on the good judgment and values of our employees, Board members, providers, vendors, and business partners to help make the right decisions. When faced with a difficult situation, ask yourself:

- Are my actions legal and appropriate?
- Am I being truthful and accurate?
- Will my actions stand up under the scrutiny of others?
- How will I feel about myself afterward?
- How will it look in the newspaper?
- Will I sleep soundly tonight?

If, when faced with a difficult situation, you're not sure what to do, ask someone for help.

SECTION

3

Asking Questions & Reporting Concerns or Possible Violations

Affinity Health Plan encourages each employee, Board member, provider, vendor, or business partner to communicate directly about any compliance issues or other matters of interest to you. All reports of suspected violations will be treated in a confidential manner to the extent permitted by law.

How should you go about asking questions and reporting concerns or possible violations?

- ❑ **First, try the Chain of Command** – If you suspect that another employee (including those in management positions), has violated the Code of Ethics, company policies and procedures, or any applicable local, state or federal statute or regulation, you should immediately report your concern through the chain of command. The chain of command begins with the person to whom you report. If that person is not available or you are not comfortable approaching that person with your concern, you should move up the management chain, e.g., from your supervisor to the manager, department director and, if necessary, to the Executive who oversees your Division.
- ❑ **Contact the Human Resources Department** – If, for any reason, you feel that you cannot report through the management chain of command, you may bring your concerns to the Human Resources Department.
- ❑ **Contact the Facilities and Administrative Services Department** – If, for any reason, you identify unsafe conditions, workplace condition, hazards, or injuries, you may bring your concerns to the Facilities and Administrative Services Department.
- ❑ **OR...Contact the Compliance Officer** – If you feel that you cannot report a compliance concern through the management chain of command, contact Affinity's Compliance Officer at (718) 794-5729. The job of the Compliance Officer is to help assure that the company and its employees comply with all applicable laws, rules and regulations. The Compliance Officer will have the matter you report researched, while preserving confidentiality to the extent permitted by law.
- ❑ **OR...Use the Ethics Line** – Another resource available to you is the Ethics Line at 1 (866) 528-1505. The Ethics Line is an external source, staffed by individuals who are not Affinity employees. If you want, you can call the Ethics Line, anytime day or night, to report potential violations of law or ask questions about laws and regulations.

- ❑ **OR...Contact any Executive** – The Corporate Compliance Program is a critically important part of our operations. It provides a mechanism and set of procedures to help us assure the integrity of the organization and to protect all of us from the damaging effects of illegal or unethical conduct. The Corporate Compliance Program is actively endorsed and supported by the senior leadership of the company. Thus, if you are uncomfortable using any of the avenues listed above to report a concern or suspected violation; you may contact any executive, including the Chief Executive Officer.

Resources for Addressing Concerns

Many types of problems or concerns can arise in the workplace. The following grid summarizes which Affinity personnel or departments you may contact to address specific issues.

Question or Concern...	Who you should contact
Workplace or employment related, including questions or concerns about your job, company policies and procedures, etc.	Your Chain-of-Command * Start with the person to whom you report.
Employment-related issues, or questions about Human Resources policies and procedures, compensation, labor relations, employment action, payroll policies, and benefits.	Human Resources * (718) 794-7120
Unsafe conditions, workplace conditions, hazards, or injuries.	Facilities & Administrative Services * (718) 794-5317
Questions about changes in law or regulations affecting your department or job.	Corporate Compliance * (718) 794-5731
HIPAA/HITECH or ways to safeguard any type of Protected Health Information (PHI) or other confidential and sensitive information, internally or externally	Chief Privacy Officer * (718) 794-5701 Information Security * (718)794-7528
Questions about the Code of Conduct, compliance policies and procedures, or to report suspected violations of the Code of Ethics, company policies and procedures, or the law.	Compliance Officer (718) 794-5729
Potential fraud, waste, or abuse activities related to employees, providers, members, or other business partners	Compliance Officer (718) 794-5729
<i>(NOTE: Additional options are listed in Section 7)</i>	
Any question or concern that you would prefer to report anonymously	The Ethics Line (866) 528-1505
* At any time, you may come directly to the Compliance Officer or other Compliance staff with your question or concern.	

Investigating Reports of Concerns or Possible Violations

Affinity ensures the prompt and thorough investigation of all reported concerns and possible violations. The Compliance Officer will coordinate appropriate follow-up action and resolution for any concern that was reported to management through the chain of command, or to the Compliance Officer or the Ethics Line. It is the responsibility of all employees, providers, vendors and business partners to cooperate with internal investigations to the best of their abilities. All investigations will be conducted following established procedures for confidentiality.

Non-Retaliation & Non-Intimidation

Affinity will not tolerate retaliation or intimidation against an employee, Board member, provider, vendor, or business partner for reporting a perceived or potential violation of the Code of Ethics, company policies or procedures, or laws and regulations. Furthermore, we will not tolerate retaliation against an employee, provider, vendor, or business partner for participating in the investigation of an alleged violation. Anyone who engages in retaliatory actions will be disciplined, up to and including termination of employment or termination of a business relationship.

- ❑ No disciplinary actions or other types of retaliation or intimidation tactics will be taken against any employees, Board members, providers, vendors, or business partners who, in good faith, reports a concern, issue, problem, violation of law, regulation or the Code of Ethics.
- ❑ Any employee, Board member, provider, vendor, or business partner who believes that he or she has suffered retaliation or intimidation for making a report should promptly contact the Compliance Officer.

Good Faith Reporting

Affinity Health Plan shall maintain an environment that promotes ongoing, open communication among directors, managers, supervisors and employees. Affinity encourages each employee to communicate directly and in good faith about any compliance issues or other matters of interest to an employee or Affinity.

- ❑ Affinity expects that employees, Board members, providers, vendors, or business partners who make reports will make them in good faith... This means that those who report a concern have an honesty of purpose, freedom from intent to defraud, and generally speaking being faithful to one's duty or obligation.

Accountability & Discipline

Affinity is confident that employees, Board members, providers, vendors, and business partners embody our commitment to ethical, professional, and legal standards. We rely on everyone to exercise good judgment to carry out the intent of the Code of Ethics.

- A violation of the standards described in the Code of Ethics can result in disciplinary action, up to and including termination of employment or termination of a business relationship.

Think about it...

Q: You overhear your Manager tell a co-worker that he is really going to get back at a Marketing Representative for reporting him to the Director...“He’ll have the worst sales territory!” he says. What should you do?

A: It is important that each of us take responsibility for building a culture of ethical behavior and integrity. It is our obligation to report suspected violations of the Code of Ethics. In this case, you may not feel comfortable speaking directly to your Manager since he/she is the subject of the suspected misconduct. You do, however, have many other resources available to you. You can move up the management chain of command to report the incident, or you can contact the Human Resources Department, the Compliance Officer, the Ethics Line or an Affinity Executive. In making your report, you can explain the conversation that you overheard without fear of retaliation.

SECTION

4

Compliance with Laws & Regulations

Affinity Health Plan operates in accordance with all applicable laws and regulations, conducts business ethically and honestly, and acts in a manner that improves our standing in the community.

- ❑ We shall not knowingly and/or willfully offer, pay, solicit, or receive money, goods, or services from a potential referral source to induce the referral of business that is reimbursable under a federal or New York State health care program.
- ❑ We shall not request or encourage Members to disenroll from any programs offered by Affinity, except as permitted by contract, to avoid high cost medical services that the Member is to receive for which Affinity bears financial responsibility.
- ❑ We shall use marketing materials that accurately describe the services Affinity provides.
- ❑ We shall adhere to all marketing practices and standards of behavior as required by company policies, local, State, and Federal regulations and guidelines.
- ❑ We shall comply with the regulatory requirements and company policies governing the creation, management, retention and destruction of records.
- ❑ We shall submit timely, accurate, and truthful information to the federal government, New York State and other regulatory authorities. If any errors in the data are recognized, we shall notify the other party and work cooperatively with that party to re-submit accurate data as soon as possible.
- ❑ We shall issue and maintain financial reports, accounting records, expense accounts, time sheets and other documents that are accurate, complete, and properly reflect the actual transaction or recorded event.
- ❑ We shall not participate with competitors or others in any activities that may illegally limit competition.
- ❑ We shall review all invoices, purchase orders and other expense items for accuracy prior to seeking approval for payment.
- ❑ We shall attend training and other activities to increase our knowledge of laws, regulations and guidelines.

- We shall initiate improvement activities and corrective actions as needed, based on information received through continuous quality improvement and risk management activities.
- We shall abide by the Fraud and Abuse Prevention Program and other State and Federal laws requiring the detection and prevention of fraud, waste, and abuse in the healthcare system.
- We shall report any violation or potential violation of laws, rules, safety standards or this Code of Ethics, following the management chain of command and other resources (e.g., the Compliance Officer or the Ethics Line) described in this Code of Ethics.

Think about it...

Q: You work in the same locations as some of our competitors. You often hear the competitors asking potential Members about their health history. This may seem to be a smart sales strategy because it could be used to avoid signing up people who will need costly health care services, right?

A: Wrong! This sales strategy not only violates federal and State rules, it also violates Affinity's mission and operating principles. It is our mission to use our health care coverage programs to improve the health of underserved populations. It is unethical and illegal to exclude or discriminate against applicants based on their health status or types of services they might require. We do not discriminate against Members for any reason, and we offer our services to all who are eligible.

SECTION

5

Conflicts of Interest

Affinity Health Plan respects the privacy of every employee while conducting his or her personal affairs on his or her personal time. Affinity, however, will not tolerate employees, Board members, providers, vendors, and business partners engaging in any activity that may conflict with the interests of Affinity. This includes, but is not limited to outside employment, participation in outside organizations, owning a financial interest in Affinity competitors, vendors, and clients, use of company assets for personal gain or advantage, and employment of relatives. Therefore, all of us must avoid business relationships and actions that could potentially or actually interfere with, or be perceived to interfere with, our business decisions.

Performance Responsibilities

- ❑ We will not take part in any conduct that is disloyal or damaging to Affinity.
- ❑ We will devote all of our work time and our abilities to our assigned job responsibilities.
- ❑ We will not participate in any outside activities that keep us from doing our job properly.
- ❑ We will not enroll ourselves, or members of our immediate family, or other Affinity employees and their family members in Affinity's subsidized health care programs.
- ❑ We will disclose all potential or actual conflicts of interest prior to the conflict or immediately upon detection, whichever is sooner, to appropriate management personnel, or Human Resources and the Compliance Officer.

Vendor/Business Relationships

- ❑ We will not contract for services with vendors, with whom we, or members of our immediate family, have a financial relationship, unless that relationship is known and approved by senior management, including the Executive of your Division.
- ❑ We will always act in the best interest of Affinity when dealing with vendors, government agencies and customers.
- ❑ We will always make purchasing decisions are based upon criteria such as price, quality, timely delivery, service and adequate supply.

- ❑ We will not involve ourselves in any business venture that competes with Affinity as this may influence our work decisions inappropriately.
- ❑ We will not do business with individuals or organizations that have been debarred, suspended or otherwise excluded from participating in federal and state programs.

Gifts

- ❑ We will not accept or request any cash gifts or cash equivalent gifts (such as gift certificates) from any vendor, supplier or their agents that do business with Affinity.
- ❑ We will not accept or request any gifts of value exceeding \$50 from any vendor, supplier or their agents that do business with Affinity, since such gifts may influence or be perceived to influence our ability to be objective. We shall report receipt of any gift in excess of \$50 through the management chain of command to evaluate if the receipt of such a gift is considered inappropriate. Some gifts, especially things like flowers or chocolate, don't last very long, and may be impractical to return. Rather than returning this kind of gift you may usually accept it as a gift to the Company, as long as it is made available for the enjoyment of everyone at the office. As with all gifts, items such as flowers and chocolates received from a vendor should be reported to the Compliance Officer.
- ❑ We do not offer payment, bribes, kickbacks, political contributions, or other incentives to Members or potential Members, physicians, US and foreign government officials, government employees, or others to encourage the use of our services.

Solicitations

- ❑ We will not solicit our Members or Members' families and friends or our co-workers for work favors, distribution of religious or political materials, personal interaction or sexual activity, selling of products/services, or charitable activities.

Think about it...

Q: A vendor invites you and your guest to a local sporting event. When you arrive, you notice that selected employees from other departments are there as well. Is there a problem that you accepted the tickets?

A: The Conflicts of Interest section provides more specifics about gifts. If you are concerned that a vendor is offering gifts in an attempt to solicit Affinity's business, if you think this gift is an attempt to influence your decision making, or if you think others might perceive that you have a conflict of interest, report the matter up the management chain of command before you accept the tickets. Remember: If in doubt, point it out.

SECTION

6

Confidentiality & Privacy

As employees, Board members, providers, vendors, and business partners of Affinity Health Plan, we may have access to confidential or proprietary information. This includes, but is not limited to, information related to its operations, information systems, technology and business systems.

Examples of confidential information include, but are not limited to:

- Member claims details and other protected health information (PHI)
(Refer to Section 8 for additional information relating to Medical Privacy)
- Financial, marketing, and statistical data
- Competitive information
- Budgets
- Processes
- Techniques
- Bid proposals, contract negotiations, and contracts
- Research and development
- Business reports and summaries
- Provider and customer information
- Information systems and technology
- Business strategies and plans

We are committed to protecting individuals' right to privacy and the confidentiality of corporate information, in accordance with applicable laws and regulations.

- ❑ We respect the privacy of our former and current applicants, Members, providers, and colleagues. We understand that we have access to the information about them, and will share that information with others on a "need to know" basis in accordance with our assigned responsibilities.
- ❑ We take reasonable steps to limit the use of, disclosure of, and requests for health information to the minimum necessary to accomplish the intended purpose, unless otherwise permitted by law.
- ❑ We do not reveal medical, clinical or business information unless such release is supported by a legitimate clinical or business purpose, client authorization or acknowledgement, or court or agency order, and is in compliance with applicable laws, rules, regulations, as well as Affinity policies and procedures.

- ❑ We treat individual salary, benefits, payroll, personnel files and information on disciplinary matters as confidential information.
- ❑ We allow the release of confidential information by appropriate staff to third parties only if the disclosure is allowed by law and/or the individual has completed appropriate authorization forms, if required.
- ❑ We do not give confidential or commercially sensitive information to competitors, suppliers, contractors, anyone outside of Affinity, or to Affinity employees who do not need such information for a job-related purpose.
- ❑ We use social media, an important communication tool, responsibly. We use good judgment when posting content on blogs, social-networking sites, and other user-generated media such as Facebook, LinkedIn, Twitter, Wikipedia, etc.
- ❑ We maintain security of the information stored on paper and electronically, or transmitted on our computer systems. Data is securely transferred when releasing PHI or business confidential information by using encryption, Virtual Private Network, or other secure transmission tools.
- ❑ We do not use non-company email accounts for company business. And, we use company email and other computer resources for business purposes, with limited exceptions.
- ❑ We report confidentiality violations through the management chain of command or to the Human Resources Department, the Compliance Officer, the Ethics Line or to another member of management who can properly assess and resolve the issue.

Think about it...

Q: You work in the Human Resources Department and overhear a co-worker requesting a leave of absence for personal reasons. You have access to her records so you look her up just to make sure she is okay. If she is sick, you want to make sure you send her flowers. You have good intentions so it is okay to look at her record, right?

A: Wrong! We all have an obligation to respect each other's privacy. You are in a department that has access to a lot of private personal information. This information should only be accessed on a need to know basis to carry out your job functions. You do not have a right to access information for any other purpose, no matter how well intentioned. The best way to handle this situation is to say nothing to your co-worker. If the person wants you to know the reason for her absence, she will tell you.

Fraud, Waste & Abuse

Affinity Health Plan has a Fraud and Abuse Prevention Program to prevent, identify, investigate, correct, report on, and prosecute instances of fraud, waste, and abuse (FWA) in the managed care environment.

Affinity strives to protect:

- ❑ Members from inadequate, inappropriate, or unnecessary services;
- ❑ Providers from the risks involved in caring for patients who have been ill served by others either by under- or over- utilization of services;
- ❑ Affinity from inappropriate financial burdens; and
- ❑ New York State and the Federal government from the costs associated with fraudulent, wasteful, and/or abusive utilization of services.

As an employee, Board member, provider, vendor, or business partner you have a responsibility to report any suspected health care fraud, waste, and abuse. If you have knowledge or information that any such activity may be or has taken place, please contact our Special Investigations Unit.

Reporting fraud, waste or abuse can be made anonymously or directly to Affinity.

*Options for reporting **anonymously**:*

- Call the Ethics Line at **1-866-528-1505** and follow the appropriate menu option for reporting fraud, waste, or abuse.
- Go to Affinity's website at www.AffinityPlan.org and click the Ethics Line hyper link.
- Send a written report to:
Affinity Health Plan
Attn: Special Investigations Unit
Metro Center Atrium
1776 Eastchester Road
Bronx, NY 10461

*Options for reporting **directly**:*

- Call the Compliance Officer at (718) 794-5729.
- Email a report to Compliance@AffinityPlan.org.
- Fax a report to 718-536-3391.

When you report fraud, waste, or abuse, please give as many details as you can, including names and phone numbers. You may remain *anonymous*, but if you do, we will not be able to call you back for more information. Your reports will be kept *confidential* to the extent permitted by law.

Member Rights

Affinity Health Plan respects Members' rights, as detailed in our Member Handbooks, and assures that health information is safeguarded and covered services are accessible to our Members.

Access and Availability

- ❑ Our Members receive medical advice from their physicians and clinicians regarding their health status and treatment options without interference from Affinity. We do not discriminate against any applicant or Member based upon that person's degree of risk for costly or prolonged treatment.
- ❑ We answer Members' questions regarding enrollment and disenrollment in accordance with state and federal policies, rules, and guidelines.
- ❑ We do not require a hospital to receive prior authorization for emergency services and we provide coverage for such emergency services in accordance with the contractual agreement between Affinity and the hospital, or in accordance with State and Federal rules and guidelines.
- ❑ We process appeals and denials in accordance with federal and state guidelines. We provide Members with necessary information regarding their appeal and denial rights.

Medical Privacy

- ❑ We ensure the privacy of information we collect, create, and maintain about our Members as outlined in Affinity's Medical Privacy Policy. Affinity's Medical Privacy Policy is posted at www.AffinityPlan.org.
- ❑ We provide notice to our Members regarding how Affinity uses and discloses health information as well as describe the rights Members have relating to the privacy of health information.

Employment Practices

Affinity Health Plan's employees are our greatest strength. We are committed to treating each other with respect, dignity and courtesy.

Equal Employment Opportunity and Freedom from Harassment

- ❑ We recruit, hire, train, and promote employees on the basis of their skills, experience, and performance without regard to gender, age, race, color, religion, sex, age, national origin, citizenship, marital status, sexual orientation, disability, military status, or any other characteristic protected by applicable federal, state, or local laws.
- ❑ We do not tolerate any type of unlawful workplace harassment.
- ❑ If we believe we have been unlawfully discriminated against, we immediately report the facts of the incident to the Human Resources Department, the Compliance Officer, or the Ethics Line.

Pre-Employment Screening

- ❑ We screen employees, Board members, providers, vendors, or business partners to determine the adequacy of their training, experience and competence to perform the job duties for which they are being hired.
- ❑ We screen employees, Board members, providers, vendors, or business partners to avoid hiring or engaging any who are currently excluded, suspended, debarred, or otherwise ineligible to participate in federal or state health care programs.

Open-Door Policy and Non-Retaliation and Non-Intimidation

- ❑ We foster a work environment in which all concerns can be raised without fear of retaliation or intimidation.
- ❑ We do not tolerate any act of retaliation or intimidation against employees, Board members, providers, vendors, or business partners who, in good faith, report a valid concern and/or a suspected violation of a law, regulation, policy, or the Code of Ethics.
- ❑ We follow the appropriate disciplinary action when a violation of this policy occurs.

Other Concerns

- ❑ We may refer to the Employee Policy Manual or contact the Human Resources Department for further information regarding Human Resources Policies.
- ❑ We may raise questions, issues or concerns regarding the Human Resources Policies and Procedures, labor relations, compensation, employment actions, payroll policies, and benefits to the Human Resources Department. We may call the Compliance Officer or the Ethics Line if we feel our questions or concerns were not addressed adequately by the Human Resources Department.

Safe & Healthy Environment

Affinity Health Plan is committed to providing a comfortable and productive work environment that is free from harassment, illegal drugs and alcohol, and hazardous conditions.

- ❑ We are committed to the safety and security of Members, employees, Board members, providers, vendors, or business partners in all of our activities.
- ❑ We implement policies and procedures to keep our facilities and vehicles safe.
- ❑ We are familiar with and follow emergency and safety plans and procedures.
- ❑ We understand and adhere to applicable laws, rules, and regulations of the U.S. Occupational Safety and Health Administration (OSHA) and related state agencies.
- ❑ We report any possible violation of Affinity's safety policies and procedures, laws, regulations or standards through the management chain of command. If we are not satisfied that the issue has been addressed, we notify the Facilities and Administrative Services Department or the Compliance Officer.
- ❑ We are committed to maintaining a work environment free of tobacco, alcohol and illegal drugs.
- ❑ We do not tolerate threatening or abusive behavior, sexual or other forms of illegal harassment, or discrimination.
- ❑ We immediately report to the Facilities and Administrative Services Department any accident or occurrence that we are involved in or witness that may cause injury to a fellow employee, a Member or other visitor.
- ❑ We do not tolerate any form of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at a Member, co-worker, employer, or vendor, terrorism, and hate crimes committed by Members, vendors, or current or former employees.

- ❑ We strictly prohibit possession of firearms, other weapons, explosive devices or other dangerous materials on any Affinity property, including all vehicles.
- ❑ We do not tolerate staff or other people engaging in sexual activity in the workplace, on any Affinity vehicles or other properties at any time.

Think about it...

Q: You are responsible for van and mobile unit maintenance. One of your co-workers is out sick one day and you run short on time to complete the van maintenance checklist. You had just checked this vehicle last week so you think it does not matter. Does it matter?

A: Yes it does. Affinity Health Plan uses a large number and variety of vehicles to support our marketing, outreach, and recertification efforts. Appropriate vehicle maintenance ensures the safety of all of our employees as well as the Members who might be sitting in them. Our safety procedures provide detailed instructions. Any concerns regarding vehicle maintenance should be reported to the Director of Facilities and Administrative Services, to the Compliance Officer, or the Ethics Line immediately.

Resource Management

Affinity Health Plan is committed to protecting company property, equipment, and other resources against loss, theft, or misuse.

- ❑ We believe the practice of selling, trading, transferring or scrapping of property without the appropriate approval is considered a misuse of assets.
- ❑ We safeguard Affinity's property, equipment, supplies, services and other assets. We have systems within our areas of responsibility to protect these items from theft or misuse.
- ❑ We respect and protect the intellectual property rights of individuals and companies with which we do business. We follow applicable copyright, patent, trademark, and marketing laws and license agreements when we use computer software and printed publications.
- ❑ We do not install, share, or copy software programs or perform any other acts that would be in violation of vendor software license agreements or Affinity policies and procedures.
- ❑ We report all hours worked properly and accurately in accordance with our time and attendance policies and procedures.
- ❑ We acknowledge all company equipment, materials, and reports used to perform a job functions is considered Affinity property. Affinity property also includes any work output, including but not limited to, paperwork, emails, computer files, other database information, customer calls, or records of other interactions. These items must be safeguarded and returned or destroyed upon separation from Affinity.

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