



WVP HEALTH AUTHORITY CODE OF CONDUCT

WVP Health Authority, and its subsidiary business entities, conducts its business in compliance with all federal, state, and local laws, rules and regulations in a manner consistent with the highest standards of business and professional ethics.

WVP Health Authority, and its business subsidiaries, has expectations of employees and first tier entities, downstream entities, and related entities involved with its business to act in an ethical and compliant manner.

WVP Health Authority operates in a heavily regulated environment in which there are a variety of areas that may be considered at risk. An effective compliance program seeks to mitigate these risks while providing a high standard of quality care and service to the beneficiaries that we serve.

The various policies and procedures that describe Plan operations represent our response to ensure that the day to day operational activity fully complies with our legal, regulatory ethical and professional responsibilities. Business subsidiaries, employees, as well as, first tier entities, downstream entities, and related entities are mandated to report any suspected fraud, waste and/or abuse to any member of management, the Compliance Officer, the Compliance Committee, the Board and/or the Fraud and Abuse Hotline. If Management receives the information, the Compliance Officer should be notified immediately for investigation. Failure to comply with the Code of Conduct may result in disciplinary action up to and including termination of employment or contract.

The code of conduct encourages the subsidiaries, employees, management, board members, first tier entities, downstream entities, and related entities and/or other governing body members to report violations of law and policy to the Plan, Center for Medicare and Medicaid Services (CMS), Division of Medical Assistance Programs (DMAP), the Insurance Commissioner and/or to law enforcement.

The written code of conduct specifies the disciplinary actions that can be imposed for non-compliance, including oral or written warnings or reprimands, suspensions, terminations, and financial penalties.

The Code of Conduct is approved by the WVP Health Authority Board and the Compliance Committee. The code of conduct is reviewed annually and validated by senior management, the WVP Health Authority Board and Compliance Committee. Standards of Conduct.

In order to ensure company compliance with this code, WVP Health Authority offers this guidance to all business subsidiaries, employees, as well as first tier entities, downstream entities, and related entities. WVP Health Authority recognizes that the successful administration of the Plans relies upon the continued competence and integrity of its employees and that all policies and processes are committed to full compliance with all federal and state rules and regulations. The Code and Standards of Conduct are the products of this commitment and will provide guidelines that encourage and promote a working environment of legal, ethical and professional standards.

These guidelines are for all business subsidiaries, employees, as well as, first tier entities, downstream entities, and related entities to follow while acting and representing WVP Health Authority in any capacity. These standards do not outline individual job responsibilities but provide a framework in which one may operate. Obviously, no one standard can be written to cover every possible business situation which may arise in the complex regulatory environment in which we operate. However the use of available resources, including all state and federal regulations and guidance, honest behavior, personal integrity, common sense and good judgment will help to identify appropriate action. If there are any doubts or concerns, the business subsidiaries, employees, as well as, first tier entities, downstream entities, and related entities may contact any member of management or the Compliance Officer.

All business subsidiaries, employees, as well as, first tier entities, downstream entities, and related entities are asked to review this information carefully. If anyone is directed to do something that is or believed to be contrary to the ethical and legal presentations of this code, they are required to report the incident to the Compliance Officer, any member of management or directly to the Compliance Committee or to the Board of Directors. Failure of the corporation to adhere to these standards can result in criminal and civil penalties.

Actions found to defraud local, state and federal health care programs may cause the Plan to be excluded from participation in these programs.

WVP Health Authority is committed to the prevention and identification of unethical or illegal conduct. WVP Health Authority requires complete honesty and integrity in all business practices in compliance with all applicable federal and state standards.