

# Code of Conduct

Do the right thing.  
Compliance begins with you.

# Table of Contents

## Introduction

CEO Statement of Compliance Commitment.....	3
---	---

## Code of Conduct

About the Code of Conduct .....	4
Complying with the Code of Conduct .....	4
Acknowledgment and Availability .....	4

## Reporting Violations

How to Report .....	5
Nonretaliation.....	5
Policies and Procedures .....	5

# Introduction

## CEO Statement of Compliance Commitment



Quartz is committed to conducting business with the highest levels of ethics, integrity, and compliance. The Code of Conduct (the “Code”), which has been adopted and approved by our Board of Directors, reflects this commitment and is available for reference at any time on our intranet. The Code sets forth Quartz’s high ethical standards and core values and is designed to guide your conduct when performing your daily work.

As we continue to grow and build our culture, it is our duty to demonstrate the highest standards of ethical conduct, integrity, and compliance in all that we do. As employees, we all have a duty to uphold the Code, our company policies, laws, and regulations by performing our jobs with integrity. The reputation and continued success of Quartz depend largely on our commitment to compliance. Doing things the right way – ethically, with integrity, and in full compliance with the law – is not just a policy of Quartz; it is part of our culture. Please ask questions and seek guidance from the Compliance department when you are unsure of what to do.

All workforce members, including temporary, contracted employees, and Board members, are obligated to read the Code, understand it, and report any known or suspected violations to the Compliance department. Reporting can be done by email, phone, mail, or in person.

Do your part by familiarizing yourself with the Code and how to report compliance concerns and make sure to report any issues that come to your attention. Thank you for joining me in your dedication to our compliance responsibility.

**Christine Senty, J.D.**  
**President and CEO**

## Code of Conduct

All individuals and entities are expected to cooperate fully and completely with any compliance program policies, procedures, or initiatives instituted by Quartz. Quartz will act in accordance with all pertinent federal and state laws. It will take reasonable steps to ensure that all employees, volunteers, temporary employees, board members, contractors, subcontractors, and first-tier, downstream, and related entities (FDRs) act in conformity with relevant laws and regulations. The following is the Code of Conduct that Quartz has adopted.

### **About the Code of Conduct**

This Code of Conduct governs the business operations of Quartz Health Plan Corporation, Quartz Health Plan MN Corporation, Quartz Health Benefit Plans Corporation, Quartz Health Insurance Corporation, and Quartz Health Solutions, which are collectively referred to hereafter as “Quartz.”

It applies to:

- All employees, including our CEO, CFO, and other officers
- All members of the Board of Directors
- All volunteers and temporary employees
- All contractors, subcontractors, and FDRs of Quartz

All are expected to understand the laws, regulations, policies, procedures, and contractual obligations and abide by the requirements in the Code of Conduct. It is a requirement to comply with the Code of Conduct articulated herein. This document is intended to describe those responsibilities.

### **Complying with the Code of Conduct**

Each employee, volunteer, temporary employee, board member, contractor, subcontractor, and FDR is responsible for ensuring their conduct conforms to the Code of Conduct, as well as any other company policy and any applicable federal and state laws and regulations. This document cannot address every situation you may encounter. As such, Quartz relies on your good judgment and values to uphold the intent of this document. If you are unsure about what to do, discuss your questions with your manager or a member of the Compliance team.

Employees in leadership positions have an added responsibility to be an example of ethical behavior and a resource for employees with questions. Leaders must reinforce the importance of ethical and compliant behavior in all we do. This includes creating an environment where direct reports are comfortable raising concerns, ensuring direct reports complete training in a timely fashion, and assisting direct reports when they have questions or concerns. It is also important to assist co-workers across Quartz in maintaining compliant and ethical behavior and business practices.

The failure to comply with all statutes, regulations, and guidelines applicable to federal and state health care programs and company policies and procedures, or the failure to report non-compliance, can result in civil and criminal liability, sanctions, and penalties. Employees may also be subject to disciplinary actions up to and including termination of employment.

If you have a question as to whether or not a procedure or action conforms to the Code of Conduct, you should speak with your immediate supervisor. If you do not feel comfortable discussing the matter with them, or if you are still unsure about the appropriate conduct, contact the Compliance department.

### **Acknowledgment and Availability**

All employees are required to read, understand, and acknowledge the Code of Conduct on an annual basis. Acknowledgments are collected electronically during annual Compliance Education. If there is anything you do not understand in this Code, you should speak with your manager or contact the Compliance department. You can always find the latest version of the Code of Conduct on the Quartz intranet.

# Reporting Violations

Persons who become aware of violations of the Code of Conduct are obligated to report them to their manager/director, the Compliance Officer, or the Compliance department. Alternatively, such concerns may be communicated to the Compliance Hotline via the following methods.

## How to Report

- Local phone number: **(608) 644-3495**
- Toll-free number: **(844) 492-2996**
- Email: **Compliance.Hotline@QuartzBenefits.com**
- Find the **Compliance Incident Reporting Form** on the Compliance Prism site
- Mail (anonymous method): 2650 Novation Parkway, Fitchburg WI 53713

All hotline communications will be kept strictly confidential to the fullest extent possible, consistent with any reporting requirements or other obligations or needs of Quartz. You have the right to report issues anonymously. If you choose to identify yourself, understand that there may be an occasional instance where the identity of the reporting individual may be disclosed.

## Nonretaliation

Reports of suspected or actual non-compliance made in good faith are confidential and will not be subject to retaliation. Any retaliatory actions against any individual or entity that reports suspected or actual non-compliance are subject to disciplinary action, up to and including termination of employment. Details can be found in the Nonretaliation policy.

## Policies and Procedures

Compliance maintains departmental policies and procedures, a Compliance Plan, and this Code of Conduct, which are available at all times on the Quartz intranet. Details on company topics such as conflicts of interest, privacy, and confidentiality, discipline, record retention, new regulations, etc., can be found in company policies on the Quartz intranet P&Ps page. All policies and procedures are to be developed, formatted, approved, issued, and maintained consistently, with the engagement of appropriate organizational stakeholders, and be made widely available to the workforce.

## Revision documentation

Date	Action	Name	Title	Date of Board/Committee Approval (if needed)
3/1/2022	Revised	Jessica Stanton	Compliance Analyst	Approved 5/12/2022
4/18/2023	Revised	Jessica Stanton	Sr. Compliance Analyst	Approved 4/20/2023
1/17/2024	Revised	Jessica Stanton	Sr. Compliance Analyst	Non-material changes only