



CODE OF CONDUCT

DO THE RIGHT THING. COMPLIANCE BEGINS WITH YOU.

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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 by our Board of Directors, reflects this commitment and is available for reference on WeKnow. 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 employees, we all have a duty to uphold the Code, 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. No success is meaningful if it’s not achieved by doing the right thing.

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. You are encouraged to ask questions and seek guidance from the Compliance department when you are unsure of what to do.

The entire workforce, 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, or in person.

Ethics, integrity, and compliance are vital to the success of Quartz. Do your part by familiarizing yourself with the Code and how to report compliance concerns and report any issues that come to your attention. Thank you for joining me in recognizing our compliance responsibility.

Dr. Mark Selna
President and CEO

MISSION, VISION, AND VALUES

Mission Statement – What We Are

We create value and earn trust by providing outstanding experiences and access to innovative, high-quality, and affordably priced health plan solutions.

Vision – Where We Are Going

We will transform health care locally and nationally by working with our customers and partners to promote the health and well-being of the people in the communities we serve.

Values – How We Achieve Our Goals

Respect, Responsibility, and Relationships.

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 and 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 healthcare programs and with company policies and procedures, or the failure to report noncompliance, 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 him or her, or if you are still unsure as to 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 WeKnow Compliance Department page.

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(s), 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
- WeKnow Compliance Incident Reporting Form
- Mail (anonymous method): 840 Carolina Street, Sauk City WI 53583

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 noncompliance 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 noncompliance 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 WeKnow. Details on company topics such as conflicts of interest, privacy, and confidentiality, discipline, record retention, new regulations, etc. can be found in company policies found on the WeKnow 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.