

# **Code of Conduct: Our Principles of Ethics & Integrity**



# Introduction

- The Applied General Agency (AGA) Code of Conduct: Our Principles of Ethics & Integrity (“The Code”) is a core element of AGA’s compliance program and provides guidelines that help us achieve the highest standards of ethical behavior.
- This course will introduce you to our new Code of Conduct. This course serves as your official acknowledgement that you have read the entire Code and that you will abide by its provisions and associated policies. At the end of the course, you will be required to attest that you have reviewed and will abide by the Code.
- In order to have the course marked complete you must select “I Agree” on the attestation page at the end of the course. This attestation is **REQUIRED** to be completed by all employees of AGA.

# Our Principles of Ethics & Integrity

## About the Code of Conduct

- **Complying with the Code** – You must comply with this Code and all policies that apply to you. If you are uncertain as to how this Code or any policies apply, or if you have questions, contact your supervisor or the Compliance Department. Compliance Contact information is available on the AGA Department Contact List, which can also be found on the Agent Portal under the forms library.
- **Reporting Misconduct** – If you encounter what you believe to be a potential Code or policy violation, speak up. Speaking up is not only the right thing to do, it's required by Company policy
- **Violations of the Code of Conduct & Policies** – Violating this Code of Conduct, Company policies, laws and regulations and/or contractual obligations not only have potential legal and regulatory consequences, but also compromises Applied General Agency's reputation. Unethical or illegal acts can never be justified.

# Integrity

At AGA, we hold ourselves to the highest standards of personal and institutional integrity in our interactions with customers, members, employees, agents, contractors, partners, and other stakeholders, including governments and the public. We recognize that appearances matter when it comes to integrity.

## Act with Integrity

- Recognize and address conflicts of interest.
- Do not buy or sell any stock based on material, non-public information you have received.
- Do not use Company property, information or your position for personal gain, or to compete with AGA.
- Each director, employee, agent or contractor involved in AGA's disclosure processes, including representations to independent auditors, government regulators, and self-regulatory organizations, is responsible for the accuracy and completeness of facts regarding the Company.

# Accountability

At AGA, we are each personally responsible for our actions

## Be Accountable

- Hold yourself accountable for your decisions and actions.
- Cooperate with all investigations.
- Prompt reporting of suspected Code or policy violations and potentially illegal or unethical conduct to an appropriate Company representative requires the courage to acknowledge our mistakes, and enables us to do whatever is needed to address them. **Failing to report suspected violations or to cooperate with an investigation is itself a violation of Company policy and can lead to discipline up to and including termination.**
- **Retaliation in any form against an individual who, in good faith, reports a suspected violation of this Code or provides information related to such reports, Company policies, the law or contractual obligations, is prohibited.** You should immediately report any suspected retaliation to the AGA Compliance Officer or your supervisor. A complete listing of Compliance Contacts is located on the AGA Department Contact List, which can also be found on the Agent Portal under the forms library. Making malicious or purposely false reports also violates Company policy and will result in disciplinary action up to and including termination.

# Fair Competition and Fair Dealing

AGA's success is founded on honest competition.

## Comply with Fair Competition Laws and Company Policy

- Many laws and regulations define and promote fair business practices to protect the competitive environment. To comply with these laws, each employee, director, agent and contractor must deal fairly with the Company's customers, agents, service providers, suppliers, competitors and employees. **No employee, director or contractor should take unfair advantage of anyone through unfair-dealing practices.**
- Avoid discussions with competitors that may appear to unreasonably restrain competition.
- Exercise caution at industry seminars and conferences.
- Exercise caution when participating in collaborative projects involving competitors, even when such projects appear to serve the public interest.
- Ask your Legal Representative if you have any questions about potential anti-trust concerns.

# Privacy and Information Security

Maintaining the privacy and security of personal information that we collect, use or that is entrusted to our care is an essential, supportive component of AGA's mission and its commitment to integrity and ethical behavior.

## **Protect Personal Information**

- Managing an individual's personal information respectfully, responsibly and in accordance with all applicable domestic and international laws builds trust individual-by-individual, serves our business objectives and fosters enduring relationships with our stakeholders.

## **Protect Privacy, Ensure Security**

- Understand the rules regarding personal information that you use and have access to in your day-to-day responsibilities.
- Fulfill the obligations of your job. When accessing or using personal information in your job, take care of it! Use only the minimum amount of information you need to do your job.
- Keep it private; keep it secure.

# Our Assets and the Environment

Stewardship is the careful and responsible management of something entrusted to your care. As AGA employees, agents and contractors, we are entrusted with the Company's assets, including equipment, supplies, data, financial information, confidential company information and intellectual property.

## Be a Steward of our Assets and the Environment

- Limit use of AGA assets or resources for personal reasons.
- Protect AGA's confidential and proprietary information.
- Use AGA intellectual property, such as trademarks, logos and brand identity only in ways that advance the Company's interests and be vigilant for signs of misuse.
- Maintain business and administrative records in accordance with AGA's document retention schedule.
- Strive to act in an environmentally responsible manner in your AGA role and in our communities.

# Government Interactions

AGA engages with government agencies and officials on many levels – as our legislators, regulators and customers – and our business dealings with federal, state and local governments are very closely scrutinized.

## **Ensure Appropriate Interactions with Government Officials**

- Involve your business segment's Legal Representative or Compliance Officer in the government- procurement process.
- Follow local jurisdictions' rules on interactions with government officials.
- Understand the impact of your personal political activity on AGA's business.
- Ensure the accuracy and truthfulness of all public statements, claims and other related documents presented to the government, our members, customers and counterparts.
- AGA employees, agents and contractors may not make payments or gifts to obtain or retain business or other business advantage to domestic or foreign government officials, or any other individual, including customers and vendors, covered by the U.S. Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act and all anti-bribery laws.

# Communications

AGA's reputation comes from the relationships it maintains with the public and all who are touched by our Company.

## **Communicate Effectively and Appropriately**

- We must present information in a clear, truthful and professional manner. Our business environment is incredibly dynamic, and our communications should positively reflect our commitment to make health care work for everyone.
- Refer members of the media to the Head of the Sales and Marketing Departments.
- Do not act as a Company spokesperson unless you have coordinated with the Head of the Sales and Marketing Departments.
- If you are asked to speak at a conference, do not speak on behalf of the Company unless you are authorized to do so by the appropriate Applied General Agency business unit.

# A Safe and Supportive Working Environment

AGA strives to provide a safe and supportive working environment for all employees.

## Promote a Safe and Supportive Working Environment

- Report all threats, attempted violence or actual violence against employees, customers, agents or third parties that occurs in the AGA workplace to the appropriate contact.
- If you are under the influence of any intoxicant, you may not work or be present on Company sites, in Company vehicles or acting on the Company's behalf.
- Immediately report accidents, injuries, or unsafe practices occurring on AGA's grounds.
- Notify the appropriate contact if you experience or witness discriminatory conduct or harassment in your workplace, or retaliation for reporting discrimination or harassment.
- Contact Information:
  - Employees should contact Human Resources Directly.
  - Agents should report incidents to your AGA Representative or the Compliance Department. Compliance Contact information is available on the Agent Portal under the forms library.

# Attestation to Abide by the Applied General Agency Code of Conduct

I attest that I have read, understand and will abide by Applied General Agency's Code of Conduct: Our Principles of Ethics and Integrity, which includes Applied General Agency's Conflict of Interest policy on page seven.

I understand that it is my obligation to comply with the law, this Code and all applicable Company policies and contractual obligations.

I further understand that I have an affirmative duty to report all suspected illegal or unethical conduct, including violations of law, this Code, Company policies and contractual obligations, or any concerns about accounting, internal controls, auditing matters, or suspected fraud and abuse. The Company maintains a strict non-retaliation policy for good-faith reporting of actual or potential illegal or unethical conduct.

I will carry out my responsibilities for Applied General Agency in accordance with this Code, the applicable laws and regulations and the Company's policies and contracts.

By signing this form, I acknowledge that I have reviewed and understand the statements above.

Name (please print) \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Department \_\_\_\_\_

*Attestations must be recorded within 90 days of employment and annually thereafter.*