



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

PURPOSE:

Our Employee Code of Conduct policy outlines our expectations regarding employees' behavior towards our members, their colleagues, and overall organization. This code of conduct also outlines our obligation to the federal government and the laws governing the Medicare program.

POLICY:

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Health Policy

At Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services, we are building better healthcare for Medicare beneficiaries and are delivering on our promises to our members. Each of us must be committed to the highest standards of business conduct. We require all associates, officers, directors and our business partners to understand and follow these high standards while doing their jobs for Devoted. Although we are a very young company, we are built for the long term.

Our Code of Conduct reflects Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services core values. In fact, our Code, is at the very foundation of our core values:

- 1. We take pride in compliance with the letter of the law.**
- 2. We treat all our members as family. "Would you place the member in this program if the member was your family?"**
- 3. We will continue to be ultra-compliant in all markets.**

This document is your guide in understanding and following Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services high standards of business conduct.

Scope

This policy applies to all our employees, regardless of employment agreement or rank, business partners.

Policy Elements

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services employees are bound by our Code of Conduct while performing their duties in work and also outside the workplace. If you become aware of a violation of this Code, our policies, or the law and regulations, you have an obligation to report it right away. If you are ever in doubt about the right thing to do in reporting a violation or conducting business, ask for help!



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

Disciplinary Action

Whether you are an associate, leader, or officer, you may be disciplined or lose your job if you:

- Do not follow this Code of Conduct
- Break any laws or regulations that apply to Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services
- Tell an associate to violate the Code, or a law or a regulation
- Fail to share information, or provide false information in connection to an investigation
- Intimidate or retaliate against an associate who reports a suspected violation regardless of whether the report is made within Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services or to outside law enforcement or government agency
- Neglect to address or report a violation of the Code, or a law or regulation, committed by you, a colleague or someone you manage



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

How to report a potential violation of this Code, Compliance concern, or potential Fraud Waste and Abuse (FWA)

At Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services we want to hear any potential violations. Every employee has an obligation to report any concerns about a potential breach in the Code of Conduct, Compliance concern and potential FWA without fear of retaliation. We are a company built on openness and trust. There are multiple ways to report a violation:

- Call our Operations manager or any partner personal cell which is given to all employees
- Report it Directly to Human Resources - We have full time HR with Paychex in which all employees have access
- Report it to your Manager
- Email: panderson@sunshineSRservices.com, Jefrost@sunshineSRservices.com,
Randerson@sunshineSRservices.com, Jafrost@sunshineSRservices.com

Compliance with Federal, State Laws and Regulations

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services is a Medicare contractor. We must properly administer the contract and hold our relationship with the Federal government to the highest standard. We strive to conduct day-to-day business activities in a way that fully complies with all the laws, regulations and ethics rules that apply. The Federal government can impose substantial penalties for violations. Please refer to our Medicare Compliance plan, which outlines all the Laws and Regulations we must comply with as a Medicare contractor.

Fraud, Waste and Abuse Fraud

FWA isn't just harmful to Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services but also the Medicare Trust Fund and ultimately our members. We are all responsible for protecting our company, coworkers, customers and business partners from Fraud, Waste and Abuse. Please refer to our internal FWA plan. Any questions regarding potential FWA violations must be reported.



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

Safeguarding Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Information

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services keeps confidential and proprietary information about our organization, health plans, our members, associates, and all those who do business with us safe from inappropriate access, use or disclosure. Restricted information includes:

- Member information, including: Name, address, date of birth, gender, Social Security or ID number, member ID number, Medicare unique identifier, financial, health or other information about the member that is not public
- Proprietary and nonpublic information about Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services or its associates, customers, suppliers, and providers
- Any information that could help or harm our ability to meet our business goals
- System credentials (user ID and password).
- Confidential information about Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services that is nonpublic sensitive information. If you are unsure if information is not for public consumption or sensitive, ask your manager, owners of Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services or call Medicare Directly with questions,
- Comply with Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Information Security Policy and Standards

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services employees are responsible for protecting such information. To ensure the security of such information, we should:

- Access, use, view or send confidential information within Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services only if we are authorized and there is a valid and approved business reason to do so
- Do not reveal restricted, confidential or proprietary information to anyone outside Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services unless required for legitimate business reasons and approved by management.
- Share only the minimum information necessary to meet business needs
- Lock up paper documents when not in use
- Comply with Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Information Security Policy and Standards, per our employee handbook.
- Properly dispose of all information when information is no longer needed



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

Respect in the Workplace

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services is committed to a safe and supportive work environment in which all employees have the opportunity to participate and contribute to the success of the business. We value diversity and collaboration. Individuals are respected for their skills, experience, and unique perspectives. As such, we:

Provide equal opportunities for employees and applicants for employment without regard to race, color, religion, sex, pregnancy status, marital status, national origin, disability, age, sexual orientation, veteran status, genetic information, gender identity, gender expression, or any other factor prohibited by law. All employment is decided based on competencies, merits and business need.

- Strictly prohibit unlawful discrimination and harassment of any kind, including sexual harassment, bullying and any other verbal, physical or visual acts that create an intimidating, hostile or offensive environment.
- Do not tolerate any threats, threatening language or any other acts of aggression or violence made toward or by any Devoted employee. Report any potentially dangerous situation to management immediately.
- Do not allow weapons of any kind on the premises.
- Do not tolerate any acts that substantially interfere with the ability of individuals to perform their job.
- Comply with all aspects of Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Policy Against Unlawful Discrimination and Harassment, per our employee handbook.
- Promptly investigate and resolve any complaints.
- While alcohol may be consumed on the premises or served at company events, we expect Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services employees to use good judgment and never drink to the point where their professional conduct or any aspect of our Code is compromised. Illegal substances also compromise safety and are not permitted for use or sale by employees.



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

Avoiding Conflicts of Interest

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services expects all employees to conduct themselves and company business with the highest ethical standards and in a manner that is not improperly influenced by personal incentives. You must avoid any real and potential conflicts of interests. If a situation arises where a personal interest or activity could interfere or appear to interfere with your judgment or work performance for Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services, you should avoid it.

While it is not possible to define all the circumstances and relationships that might create a conflict of interest, examples of areas to avoid include:

- Simultaneous employment - including Board seats and advisory roles, by another company that is a competitor, client-of or vendor-to Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services.
- Business relationships - carrying on Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services business with a company in which you, or a close relative, has a substantial ownership or interest; or holding a substantial interest in, or participating in the management of, a vendor to which Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services makes sales or from which it makes purchases.
- Civic duties - participating in activities in a manner that divulges confidential Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services information; voting/deliberating as an elected official on a decision affecting Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services.
- Borrowing money - from customers or firms, other than recognized loan institutions, from which Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services buys services or supplies.
- Accepting or giving substantial gifts (over \$50 cash value per individual) or excessive entertainment (over \$200) from/to an outside organization or agency.
- Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
- Misusing privileged information or revealing confidential data to outsiders.
- Using your position at Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services or knowledge of its affairs for personal gain.
- Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

Proper Use of Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Resources

Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services provides a wide array of company resources to employees for use in performing day-to-day business activities. We are also transparent in sharing company information to support employee work efforts. All employees must use these resources professionally and responsibly in the best interest of Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services.

- **Company Equipment and Communications** - Computers, including use of email and internet, as well as phones and cell phones, are for business use. While we recognize employees may use these tools occasionally for non-work out of convenience, we expect that you use your good judgment and that it never interferes with your ability to perform your job. Keep in mind that communications are not private and there should be no expectation of privacy.
- Any information (including personal information) on Company devices or systems is potentially recoverable by Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services in the event of legal action or investigations.
- All use of company-provided communications systems, including e-mail and internet use (includes social media), as well as any other information Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services employees create, transmit, or possess, must adhere to our Code of Conduct. This includes but is not limited to our policies of Unlawful Discrimination and Harassment; Restricted, Confidential and Proprietary Information; and Conflicts of Interest.
- **Social Media** - If you post something on your own blog, webpage, social networking, Twitter or similar site or on someone else's, and you mention Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services and also express either a political opinion or an opinion regarding Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services actions that could pose an actual or potential conflict of interest with the Company, you must include a disclaimer. You should specifically state that the opinion expressed is your personal opinion and not the Company's position. Content must adhere to our Code of Conduct.
- **Follow all IT Security Policies.** If you lose your laptop, cell phone or think IT Security is compromised in any way, immediately report it to IT, per our employee handbook
- **Follow the PHI and Office Security Policies** - Keep laptops and other company equipment secure. Adhere to building security entry process. You must properly handle PHI. Do not enter any protected health information in any system that is not approved by the company as HIPAA compliant. Immediately report any suspicious activity or potential breaches to the privacy officer.
- **Financial Integrity** - Use good judgment regarding company finances, including how you spend money, contracts you enter and adherence to internal Financial controls and Travel and Expense policies.



3320 Rue Royale-1, St. Charles, MO 63301 | 2685 Ulmerton Rd, Ste. 211, Clearwater, FL 33762
833-247-8283 727-228-8868

- All items such as Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services manuals, reports, records and statements are the property of the company and must be kept at the company, unless removal has been properly authorized. Paper business records should be avoided whenever possible and shredded as soon as no longer needed.
- To maintain building security and in connection with any investigation, Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services reserves the right to search company property such as desks, cabinets, or other storage areas and inspect items found inside such areas. Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services also reserves the right to inspect any and all packages entering and/or leaving our premises.

REFERENCED DOCUMENTATION:

- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Policy on Health Plan/Data Retention
- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services on Conflict of Interests
- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services on Compliance Violations, Reporting, Investigations
- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Policy on Compliance, Ethics, and Fraud Hotline
- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Policy on Non Compliance, and Fraud, Waste and Abuse
- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Policy on Non- Retaliation
- Bi-State Insurance Solutions, LLC / dba Sunshine Senior Services Policy on Investigation of Sales Complaints

ACRONYMS & DEFINITIONS:

- FWA - Fraud, Waste and Abuse
- PHI - Personal Health Information

Owners of Sunshine Senior Services:

Jess F. Frost, Jumeal Frost, Robert L. Anderson