



AlohaCare

For a healthy Hawaii.

Business Conduct Guidelines

2014

Approved by Chief Executive Officer and Board of Directors

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AlohaCare's Code of Ethics

Integrity is the cornerstone of AlohaCare's reputation and an important asset. We build and retain our integrity through the ethical behavior of every AlohaCare employee in the true spirit of aloha. To help strengthen the foundation, this code of ethics identifies and explains the key standards we strive to meet.

Our conduct in the workplace

We recognize the diversity of fellow employees, job applicant customers, suppliers and other stakeholders. We refrain from gender or racial bias, creed, color, national origin, sexual or other discrimination or harassment. We treat each other as we want to be treated – with fairness, honesty and respect in the true spirit of aloha.

Maintaining confidentiality and security

We honor the privacy of members' and coworkers' or employees' personal information, whether medical or otherwise, just as we expect our privacy to be protected. We take appropriate precautions to protect the confidentiality and security of member, coworkers or employees and company information and transactions. We promise to protect trade secrets and confidential information, otherwise known as "intellectual property," that belongs to AlohaCare. We refrain from divulging information that could be harmful to AlohaCare or that could provide an advantage to our competitors.

Respecting company property and resources

We treat company property and resources as such both while working at AlohaCare and after leaving. We protect and preserve company property and refrain from using it for personal gain. We understand that company property includes, but is not limited to, AlohaCare's intellectual property, physical property and electronic communications systems.

Avoiding conflict of interest

AlohaCare encourages employee participation in non-profit activities. Representing oneself as an employee of AlohaCare through associations or activities that might conflict or appear to conflict with AlohaCare's interests is prohibited. We avoid doing business with competitors or other organizations that might conflict with the values at AlohaCare. We do not accept gifts from contractors or customers, or give gifts to them, if doing so might compromise, or give the appearance of compromising, our business decisions. We do not take advantage of our association with AlohaCare for personal gain.

Addressing health care resources

We strive to provide health plans, products, and services that are appropriate, efficient and cost effective. We apply proven scientific principles as we balance the needs of the many with the needs of the individual. We commit to working with providers and using our resources to continuously improve the health of our members.

Obeying the law

We always uphold the law while working at AlohaCare. We commit to obeying all federal, state and local regulations with regard to our health plans and all our business units. We do not condone the use of illegal substances, the abuse of legal substances, fraud, embezzlement or any other illegal activities.

Introduction

At AlohaCare, business conduct is as important as business performance. Our behavior – both as individual employees (coworkers, employees, temporary employees, consultants, and contractors) and collectively as a company – affects our success, shapes our reputation, and communicates our shared commitment to ethics, integrity and honesty in the spirit of aloha.

Our Compliance Program and the concept of aloha guide us in making business decisions in alignment with company mission, vision, and values. This program has multiple facets – ranging from internal monitoring to establishing ethics training and education. One of the program’s integral components is defining our expectations of each employee’s personal conduct and workplace behavior. To communicate these expectations, we have developed this Business Conduct Guidelines booklet.

This booklet is a quick reference guide on the standards of conduct that you must uphold as an AlohaCare employee or agent. It first introduces you to AlohaCare’s Code of Ethics, which includes six topics: (1) conduct in the workplace, (2) maintaining confidentiality and security, (3) respecting company property, (4) avoiding conflicts of interest, (5) addressing health care resources, and (6) obeying the law. It then describes the various elements within each of the six topics. These elements, which we refer to as our business conduct guidelines, define our standards of workplace behavior.

The information in this booklet focuses primarily on the code and guidelines. To expand your knowledge and understanding of expected behavior, we encourage you to review our company policies and procedures, which can be accessed on AlohaLines. For more detailed information on how to comply with AlohaCare’s requirements for workplace conduct, refer to company-level and department-level policies and procedures and/or talk to your supervisor or Human Resources representative.

Our reputation for integrity and the aloha spirit is an invaluable long-term competitive advantage. Fostering an ethical work environment that enhances AlohaCare’s reputation should be your call to action – your personal pledge to maintain the highest ethical standards as an AlohaCare employee.

Our conduct in the workplace

“We recognize the diversity of fellow employees, job applicant customers, suppliers and other stakeholders. We refrain from gender or racial bias, creed, color, national origin, sexual or other discrimination or harassment. We treat each other as we want to be treated – with fairness, honesty and respect in the true spirit of aloha.”

Equal employment

AlohaCare believes in hiring, promoting and compensating employees without regard to race, color, national origin, age, gender, religious preference, marital status, sexual orientation, handicap or disability or any other characteristic protected by law. We are an equal opportunity employer committed to employment practices that comply with all laws, regulations and policies related to non-discrimination.

Freedom from harassment

AlohaCare is committed in all areas to providing a work environment that is free from any form of harassment or discrimination based on race, ethnicity, color, national origin, age, gender, religious preference, marital status, sexual orientation, handicap or disability or any other characteristic protected by law.

Because harassment means different things to different people, we must refrain from any behavior that can be construed as offensive or inappropriate. Examples of inappropriate and offensive behavior include degrading jokes, intimidation, slurs, and verbal or physical conduct of sexual nature harassment, including unwelcome sexual advances and requests for sexual favors. If an employee feels that he or she has been harassed they should immediately report the harassment to his or her supervisor, the supervisor’s supervisor, compliance or human resources. Reports will be promptly investigated, and employees found to be engaging in this behavior will be disciplined, up to and including termination of employment.

Safe environment

At AlohaCare, we are each responsible for creating a safe working environment. All employees are expected to work safely, utilizing available materials and devices. Employees are expected to report any of the following potential or actual problems to supervisors:

- Injuries or other illnesses;
- Hazards such as facilities and equipment malfunctions or dangers;
- Security violations or criminal activity on company premises; and
- Actual or threatened acts of violence or intimidation
- Violence or criminal activity should be reported to policy and building security immediately, regardless of the availability of a supervisor

Maintaining confidentiality and security

“We honor the privacy of members’ and coworkers’ or employees’ personal information, whether medical or otherwise, just as we expect our privacy to be protected. We take appropriate precautions to protect the confidentiality and security of member, coworkers or employees and company information and transactions. We promise to protect trade secrets and confidential information, otherwise known as “intellectual property,” that belongs to AlohaCare. We refrain from divulging information that could be harmful to AlohaCare or that could provide an advantage to our competitors.”

Confidentiality and security

To protect AlohaCare and our members and employees, we are committed to preserving the right of privacy and the confidentiality and security of information. The following information is confidential:

- Members’ protected health information, including diagnoses and treatments, personal data, billing and contact information;
- Employee information, including personnel files, evaluations, disciplinary matters and psychological assessments;
- Business information, including but not limited to, financial, marketing and statistical data; competitive information; budgets; processes; policies and procedures; techniques; mergers, acquisitions or significant reorganizations; bid proposals and contract negotiations; layoffs; research and development; and business reports and summaries. This company-specific information is referred to as “intellectual property.”

When using or sharing such information, you must secure all data (electronic or otherwise) and follow all applicable laws and company policies. Failure to maintain confidentiality and appropriate security of information could subject employee personally or AlohaCare to civil and/or criminal penalties, lawsuits, or give competitors an unfair advantage.

Insider Trading

As an employee of AlohaCare, you may have access to internal information concerning AlohaCare or its vendors and providers. For those companies AlohaCare works with that are publicly traded, employees may not buy or sell stock or engage in any other action to take advantage of material nonpublic information concerning any party or pass it on to others. In addition, employees may not discuss this information with anyone outside of AlohaCare, and are only permitted to discuss it internally with AlohaCare employees who absolutely have a need to know.

Information concerning AlohaCare and its vendors or providers is “material” if it is likely to affect the price of a company’s stock or would in some other way affect the investment or voting decisions of the average shareholder or investor. Examples include major new products or services, significant personnel changes, marketing strategies, mergers and acquisitions, financial results or other strategic plans. Information concerning AlohaCare is “nonpublic” if it has not been widely circulated to the public through major news services. In general, nonpublic information concerning AlohaCare or its vendors or

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providers does not become public until the close of trading on the third full day following the widespread public release of information.

In summary, if an employee learns something about a company working with AlohaCare, and the information is supposed to be private, employees can't use the information to buy or sell stock or give the information to someone else who might take advantage of the knowledge. Employees can assume the information is "nonpublic (secret)" if employees only know about it because the employee heard it as part of employees job, or if employee knows the companies are trying to limit who has the information. The only way to know for sure that it is not "insider information" is if it has been reported in the news media or a company press release more than three days ago.

Respecting company property and resources

“We treat company property and resources as such both while working at AlohaCare and after leaving. We protect and preserve company property and refrain from using it for personal gain. We understand that company property includes, but is not limited to, AlohaCare’s intellectual property, physical property and electronic communications systems.”

Use of resources

AlohaCare’s facilities, equipment, technology and resources are for business purposes – to help employees do their job. Employees must use AlohaCare’s company property in a professional, productive, and lawful manner. Employees must act responsibly, reasonably and maturely and use good judgment regarding all company-provided communications and computing devices, including, but not limited to:

- The Internet;
- All forms of printed and electronic media;
- Copying devices (scanners and copy machines);
- Telephones;
- Cell phones;
- Portable/wireless PDAs;
- Desktop and laptop computers; and
- Remote access hardware and software devices.

Employees must not use the computer to transmit, store or download material that includes, but is not limited to, harassing, threatening, maliciously false or obscene information. The computer should also not be used for any unauthorized activities.

Internal Controls

AlohaCare has established control standards and procedures to ensure that company property and equipment is protected and properly used. Control standards are also in place to ensure that financial records and reports are accurate and reliable. All employees of AlohaCare share the responsibility for maintaining and complying with required internal controls.

AlohaCare takes all necessary steps to keep our Information Systems secure and inaccessible to outside interference and attack. Employees receive guidance to help protect the integrity of the system and the data stored therein.

Travel and entertainment

Travel and entertainment expenses should be consistent with the employees’ duties and AlohaCare’s needs and resources. It is AlohaCare’s policy that an employee should not suffer a financial loss or gain as a result of business travel and entertainment. Employees are expected to exercise reasonable

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judgment in the use of AlohaCare's funds. Employees must comply with AlohaCare guidelines relating to all purchasing procedures, payment limits and travel and entertainment expense.

Avoiding conflicts of interest

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Activities and relationships beyond AlohaCare

As AlohaCare employees, we must make certain that our outside activities do not in any way conflict with, appear to conflict with, or pose a hazard to AlohaCare. To ensure that employees avoid conflicts of interest, follow these two simple guidelines:

- Avoid personal outside activities or associations that might influence your business decisions or your ability to do your job objectively; and
- Avoid doing business with competitors or making significant personal financial investments in competitors, suppliers or customers.

Entertainment, gifts and gratuities

AlohaCare understands that entertaining – including meals, social events or training and educational activities – is an overall excepted practice of most business, but at AlohaCare it is not. As a government contracted entity, we may not accept gifts or gratuities. If such are received, they may be donated to charities, made available to all employees, or returned to the sender with acknowledgement of their support and return of the item(s).

Refrain from giving or accepting gifts to or from vendors, customers and other business associates. It is the employee’s responsibility to report or seek counsel should the employee receive or give gifts. AlohaCare employees must never accept cash gifts from or give cash gifts to vendors, members or customers.

Procuring services from vendors and suppliers

As an AlohaCare employee, you must procure services or products consistent with applicable legal and regulatory requirements and AlohaCare policies and procedures. Employees must offer fair and equal opportunity to vendors and supplier seeking to do business with AlohaCare, and employees must negotiate and buy products and services without prejudice or favoritism. At AlohaCare employees should not procure services for personal gain or to enhance personal relationships.

Fundraising and solicitation activities

To avoid conflicts of interest and to ensure that required business activities are performed in an effective and efficient manner, AlohaCare does not permit employees to solicit goods, funds, services or

membership during working hours, even for a charity or to raise money for groups, like athletic teams or schools. Distributing leaflets, flyers, or other forms of printed or written materials during work time is also prohibited. For further direction as to the requirements for fundraising and solicitation activities please refer to the employee handbook or talk with a Human Resources representative.

Honoraria

With approval from the CEO, employees are encouraged to participate as faculty and speakers at educational programs and functions related to their work. For such activities performed during paid time, any honoraria or payments for such services must be given to AlohaCare. Activities outside of work hours, the individual may keep the honoraria but is subject to personal reporting of all taxes and liabilities from such.

Participation on Boards of Directors/Trustees

Upon request, an employee shall disclose services as a member of the Board of Directors/Trustees of any organization. A director, officer, or other employee must obtain approval from the Chief Executive Officer prior to serving as a member of the Board of Directors/Trustees of any organization whose interests may conflict with those of AlohaCare. AlohaCare reserves the right to prohibit such membership where there might be a conflict or appearance of conflict. The Chief Executive Officer will consult with the Compliance Committee and/or legal counsel to determine if participation may conflict with the interests of AlohaCare.

Addressing health care resources

“We strive to provide health plans, products, and services that are appropriate, efficient and cost effective. We apply proven scientific principles as we balance the needs of the many with the needs of the individual. We commit to working with providers and using our resources to continuously improve the health of our members.”

Use of health care resources and quality improvement

AlohaCare constantly looks for ways to improve health outcomes for our members while effectively managing our resources in the true spirit of aloha. Our methods include applying scientific evidence, fairly administering benefits to members and educating members and providers. Our goal is to assure that members receive the right care at the right time in the right place.

We promote continuous quality improvement and are committed to complying with state and federal regulations regarding health care.

Fraud, waste, and abuse

AlohaCare is committed to ensuring that our employees, plan members, providers, suppliers, vendors, and anyone else doing business with or associated with AlohaCare complies with federal and state anti-fraud and abuse laws. The following are some examples of prohibited activities:

- Direct, indirect or disguised payments in exchange for the referral of potential members;
- Submitting false, fraudulent reports to any government entity to substantiate a request for payment to AlohaCare, including stating that services were provided that were not rendered, reports that characterize the service differently than the service actually rendered, or other submissions of information or data that does not otherwise comply with applicable program or contractual requirements;
- Submission by providers of claims for payment by AlohaCare for services that were not rendered, or substandard care or care that did not meet generally recognized standards of practice; and
- False representations by potential members in order to gain or retain participation in an AlohaCare program or to obtain payment for any service.

Obeying the law

“We always uphold the law while working at AlohaCare. We commit to obeying all federal, state and local regulations with regard to our health plans and all our business units. We do not condone the use of illegal substances, the abuse of legal substances, fraud, embezzlement or any other illegal activities.”

Regulatory obligations

As a consumer health service organization and a government contracted entity, AlohaCare is heavily regulated by federal, state and local agencies. Some of our regulated business practices include:

- Ensuring that medical services and business practices meet quality assurance standards and protect member rights and confidentiality;
- Managing provider networks and health care delivery systems to make certain they meet contractual requirements and are accessible to our members;
- Monitoring the appropriate utilization of health care resources and ensuring that most cost effective, medically necessary, covered services are not inappropriately denied;
- Providing for expeditious handling of members’ complaints and appeals;
- Processing claims accurately and promptly;
- Conducting sales and marketing activities ethically and within established regulations and guidelines;
- Ensuring accurate and timely administration of membership accounting, including enrollment, disenrollment, member status and other requirements;
- Promoting a work environment for employees that is safe, ethical and founded on principles of equal employment and non-discrimination; and
- Ensuring the accuracy of AlohaCare’s financial statements and business activities in general.

External audits and reviews

Frequently we will have outside parties on site to perform financial and regulatory audits and reviews of our financial statements, operations and business practices. These outside parties include independent auditors and federal and state government regulators and inspectors. It is AlohaCare’s policy to fully cooperate with these auditors and provide them with all necessary information.

Prior to and during these audits or inspections, you must:

- Never conceal, destroy or alter any documents;
- Never give any false or misleading statements to inspectors;
- Never provide inaccurate information; and
- Never obstruct, mislead or delay communication of information or records about a possible violation of law.

Illegal activities

AlohaCare and our employees must not engage, directly or indirectly, in any corrupt business practices or other illegal activities, including, among other things, fraud, embezzlement, kickback arrangements or drug use.

Fraud includes such things as falsifying documents or misappropriating company assets. Health care fraud occurs when someone uses false pretenses, representations, promises or other means to defraud or otherwise obtain money, service or property from any health care benefit program.

Embezzlement involves the attempt to take, for personal use, money or property, which has been entrusted to you by others without their knowledge or permission.

A kickback arrangement involves accepting or offering bribes or payoffs intended to induce, influence or reward actions of any person or entity in a position to benefit AlohaCare. Such persons or entities include customers, contractors, vendors and government personnel.

Financial Reporting

All financial reports, accounting records, research reports, expense accounts, time sheets and other documents accurately and clearly represent the relevant facts or the true nature of a transaction. Improper or fraudulent accounting, documentation or financial reporting is contrary to the policy of AlohaCare and may be in violation of applicable laws. AlohaCare abides by all relevant tax laws and files reports in a manner consistent with applicable laws and regulations.

Antitrust and unfair competition

Antitrust laws help to ensure that competition between companies is fair. These laws protect the public against business competitors who band together or “collude” to set prices unfairly.

You should be particularly sensitive to antitrust rules if you participate in trade associations or other meetings where competitors are likely to be present. You could be breaking these laws if you discuss any of the following with competitors:

- Pricing;
- Terms and conditions of sales; or
- Dealings with customers, suppliers or other competitors.

Our competitors include other managed care organizations and health insurance companies that operate in our markets.

Contact Legal Counsel if you are uncertain whether discussions with competitors put you at risk of violating anti-trust laws. Work with you manager or supervisor for approval and legal contact information.

Political and lobbying activities

Officers, directors, and general employees are restricted from engaging in activities that may jeopardize the tax exempt status of AlohaCare, including participation in various lobbying or political activities.

Individuals shall not make agreements to contribute monies, property, or services of any officer or employee at AlohaCare's expense to any political candidate, party, organization, committee or individual in violation of any law. Officers, directors, and employees are not restricted from personally participating in and contributing to political organizations or campaigns, but must not do so under the AlohaCare name or use AlohaCare funds.

AlohaCare has many contacts and dealings with governmental bodies and officials. Such contacts and transactions are expected to be conducted in an honest and ethical manner. Any attempt to influence decision-making processes of governmental bodies or officials by an improper offer of any benefit is prohibited. Any requests or demands by any governmental representative for a payment or other improper favor should be reported immediately through AlohaLines or directly to the Compliance Officer or any member of the Compliance Committee.

Sales, marketing and advertising standards

We are committed to growing our Medicare Advantage membership through a well-trained, highly professional sales staff, including our workforce and independent brokers. All AlohaCare sales representatives are committed to fair, forthright and legally compliant sales and marketing practices. We adhere to any state regulations that require sales representatives to be licensed.

We do not engage in corrupt marketing practices, including misrepresentation of our covered services or "redlining," which refers to the practice of avoiding sales in specific geographic areas or neighborhoods.

When advertising our products and services, we present only truthful, non-deceptive information. In many cases, advertising and marketing materials require approval from regulatory agencies prior to distribution. When required, AlohaCare submits materials to agencies and ensures their full compliance with applicable regulations.

Copyright laws

AlohaCare complies with state, federal and foreign laws pertaining to copyright protection. Our compliance includes, but is not limited to, laws that prohibit duplication of print materials, licensed computer software and other copyright-protected works.

We expect compliance with all copyright protections, including refraining from using company property to display, copy, play, store, transfer, transmit, download music or other sound recording (including CDs and MP3 or similar file formats), copyrighted pictures or images, motion pictures, clips (including AVI, Mpeg, DVDs or other similar formats), or other non-business-related materials (e.g., games, screensavers).

Relationships with foreign business and governments

As we take advantage of global business opportunities, AlohaCare will comply with applicable laws and regulations governing relationships with business on foreign soil and their respective governments. For example, we will comply with the Foreign Corrupt Practices Act, anti-bribery laws and money laundering laws as applicable.

Medicaid, Medicare Advantage, and Medicare Part D Prescription Benefit Plan

AlohaCare employees are required to follow the legal and regulatory requirements pertaining to our relationship as a government contracted entity servicing Medicaid (known as QUEST), Medicare Advantage, and Medicare Part D benefits. The requirements for these agencies are outlined in the QUEST request for proposal and established in the Centers for Medicare and Medicaid Services regulatory manuals.

As a government contracted entity, AlohaCare is obligated to abide by federal, state and local laws pertaining to that relationship. Penalties for breaking government contract laws and regulations can be severe and negatively impact AlohaCare, its business, and reputation.

Excluded parties

AlohaCare takes steps to ensure that it does not engage in relationships with or make any payments to individuals or entities that are debarred, suspended, or otherwise excluded from participating in state or federally funded programs. This applies to the Board of Directors or any board subcommittee, employees, contractors, consultants, providers, delegated entities, and vendors.

Document Retention

AlohaCare maintains a record retention process that supports the retention requirements of law, regulation, and policies and procedures. Should AlohaCare or anyone associated with AlohaCare be involved in any litigation activities, AlohaCare will not alter, destroy or throw away information that may be related to the dispute. All employees are required to abide by this requirement.

Government requests or requests for information

AlohaCare employees should notify their supervisor and the Compliance Officer (or any member of the Compliance Committee) if they are approached by an agent or official of the state or federal government, and asked to provide information, records, documents or answer questions if the request is not related to a routine report or workforce activity, or was not scheduled in advance.

Should you receive a subpoenas, court orders, notification of legal action (or threat thereof), or become aware of fraud and abuse investigations, or requests for information from third parties, you are requested to forward such communication to the compliance department for handling and response.

Responsibilities & consequences

AlohaCare's guidelines and policies cannot address every potential situation or issue that employees may encounter. Employees must have a thorough understanding of AlohaCare's code of ethics, guidelines and policies and procedures so he or she can effectively evaluate the specific situations.

Employee responsibilities

AlohaCare provides employees with training so they are knowledgeable about our ethics and compliance initiatives. In return, we rely on the employee to help ensure that those initiatives remain a priority. We expect the employee to uphold all of the standards outlined in these guidelines and to report known or suspected violations of those standards.

Reporting suspected violations

Take responsibility for safeguarding AlohaCare's integrity. If you observe potential violations of law or the company code of ethics, report them. Failure to do so could pose a risk to AlohaCare or, in the case of illegal activities or regulatory violations, a risk to you, co-workers or members.

Resolution and non-retaliation

Once a problem or suspected violation has been reported, AlohaCare will take appropriate action to review the reported matter. We will not retaliate against you for reporting ethics or compliance violations in good faith. Anyone who engages in retaliatory activity is subject to disciplinary action, up to and including termination.

Consequences of violations

AlohaCare will be thorough in our review of possible ethics or compliance violations. Employees may be subject to appropriate disciplinary action, up to and including termination, for engaging in activities such as, but not limited to:

- Authorizing or participating in actions that violate AlohaCare guidelines, policies and procedure;
- Failure to report a possible violation of AlohaCare guidelines, policies and procedures;
- Refusing to cooperate with a compliance investigation;
- Disclosing confidential information to any unauthorized person, company, organization or government agency about an inquiry without authorization;
- Retaliating against someone for reporting misconduct or violations; or
- Filing intentional false reports of misconduct or violations.

The degree of disciplinary action will be determined by the nature and surrounding circumstances of the violation.

Where to find answers to your questions and report issues

Ethics and compliance resources

Business Conduct Guidelines are meant to provide an overview of AlohaCare's policies on ethics, compliance and conduct-related issues. This publication is a living document and is subject to change as we refine our policies and procedures, and as government agencies and regulators modify their rules.

If you need more information or if you have an ethics or compliance-related question, the best thing to do is to talk with your supervisor or Human Resource Representative. Employees may also contact the Compliance Officer directly. These individuals are the best sources for helping you understand the laws, regulations and practices that affect your work.

In addition, we encourage you to explore the following resources:

AlohaCare's employee handbook

The handbook covers various topics, including employment, benefits, performance reviews, wage and salary information, and employee relations subjects such as dress code, workplace conduct, counseling, and health and safety issues. The employee handbook also directs you to the appropriate policies and procedures for each topic.

AlohaCare's AlohaLines

This site contains extensive information on company policies, procedures and standards that affect your work.

Where to report issues

If you have an ethics or compliance question or concern, you have the following options:

- Talk with your supervisor. He or she is familiar with you and the issues in your workplace.
- Contact your Human Resource representative.
- Send a report using AlohaLines Compliance Reporting Form.
- Contact the Compliance Officer.

The AlohaLines Compliance Reporting Form allows employees to communicate violations or concerns anonymously without retaliation. If you report an issue through this method or other confidential reporting mechanism and choose to remain anonymous, be prepared to provide the location and enough information about the incident or circumstances to allow for the initiation of a review.

AlohaCare's policy is to preserve the confidentiality of individuals who communicate suspected violations who are questioned in an investigation, subject to limits imposed by law. To the extent possible, all reported issues are treated as confidential and no attempt is made to identify the submitter from which the information was received.