



Administrative Policy: Ethics

PURPOSE.

The purpose of the New Hampshire Individual Health Plan Benefit Association, known as the New Hampshire Health Plan ("NHHP"), Ethics Policy (the "Policy") is to promote and establish guidelines for:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Responsible stewardship of NHHP resources;
- Compliance with applicable governmental laws, rules and regulations;
- Commitment to excellence and to maintaining the public trust;
- The prompt internal reporting of violations of the Policy to appropriate persons of authority within NHHP; and
- Accountability for adherence to the Policy.

POLICY

It is the policy of NHHP that all directors, officers, committee members, third party administrators and contractors of NHHP shall, to the best of their knowledge and ability, adhere to, comply with and advocate the principles set out in this Policy governing their professional and ethical conduct in the fulfillment of their responsibilities. The Policy embodies principles to which all directors, officers, committee members, third party administrators and contractors are expected to adhere and advocate.

A. *Standards of Conduct.* All directors, officers, committee members and third-party administrators and contractors of NHHP will:

1. Act with honesty, integrity and in the best interests of NHHP, avoiding actual or apparent conflicts between personal and private interests and the interests of NHHP, including refraining from receiving improper personal benefits as a result of holding a particular position with NHHP;
2. Not solicit or accept, for personal or other benefit, business or similar opportunities that conflict with NHHP's interests (via direct or indirect competition or otherwise) or that could reasonably be expected to otherwise accrue to the benefit of NHHP;
3. Use NHHP assets entrusted to them in a responsible manner and refrain from using information or opportunities obtained in connection with his position with NHHP for personal gain, and protect corporate assets from loss, theft, misuse and waste;

4. Exercise prudence in incurring and approving budgets, and work to minimize expenses to ensure that they are reasonable and serve NHHP's interests;
5. Where applicable, provide the New Hampshire Insurance Commissioner and the public with reports and information that is full, fair, accurate, timely and understandable;
6. Endeavor to comply with applicable laws and regulations of local and federal government and government agencies having jurisdiction over NHHP;
7. Act in good faith, responsibly with due care and diligence and without misrepresentation or omission of material facts and strive to maintain independent judgment in the performance and fulfillment of their duties and responsibilities;
8. Engage in fair dealing with NHHP's members, insureds and providers;
9. Respect the confidentiality of information acquired or obtained in the course of performance of their responsibilities, never use confidential information for personal advantage, and disclose confidential information of NHHP or third parties only when such disclosure is legally required or is otherwise authorized;
10. Not fraudulently influence, coerce, manipulate or mislead any auditor engaged in the performance of an audit for the purpose of rendering financial statements materially misleading;
11. Comply faithfully with other policies and procedures of NHHP as applicable, including without limitation the NHHP Plans of Operation, Grievance Procedures, Conflict of Interest Policy, Privacy Policy, Document Retention Policy and Whistleblower Policy; and
12. Conduct NHHP business in accordance with recognized industry standards.

- B. *Compliance and Reporting.* NHHP expects each director, officer, committee member and third-party administrator and contractor to take all reasonable steps to prevent a violation of the Policy, to identify and raise potential issues before they lead to problems, and to seek additional guidance when necessary. Any violations of the Policy may result in disciplinary action, up to and including termination or removal, as applicable.

It is the duty of each director, officer, committee member, third party administrator and contractor of NHHP to report violations or suspected violations of the Policy promptly to the attention of the those persons identified, and in accordance with the procedures outlined, in NHHP's Whistleblower Policy, which are incorporated herein by reference..

Any waiver of this Ethics Policy may be made only by NHHP's Board.

If the Board believes that standards for compliance with the Policy are not objective, or that the process for determining violations is not fair or that the Policy is not conducive to prompt and consistent enforcement, or that the protection for persons reporting questionable behavior pursuant to the Policy is inadequate (either under the Policy or under NHHP's Whistleblower Policy), the Board shall adopt appropriate changes to the Policy or other NHHP policies.