Dear Colleagues:

At Noridian Healthcare Solutions (Noridian) we are committed to conducting business ethically and with integrity, in full compliance with applicable laws, regulations, and contractual requirements. Every day we practice a culture of ethical behavior by putting our values into action while carrying out our daily responsibilities. To guide our behavior and work, the Noridian Code of Conduct (Code) provides value-based principles based on the laws, regulations, and company policies that affect us.

Who does the Code apply to? All of us.

The Code applies to all (employees, contingent workers, officers and board members). It applies equally to those who work on government program contracts and those who do not. We are all responsible to carefully read the Code and understand our obligation to conduct our work and business affairs lawfully, ethically, and with integrity.

It is not possible for any code of conduct to cover all possible circumstances or anticipate every situation. If confronted with a situation that is not specifically outlined in our Code, use its principles and concepts to consider the situation and respond. If you are still unsure, ask for help.

Thank you for your commitment to performing our business ethically and in accordance with the principles of our Code. Our continued success and our future depend on it.

Sincerely,

Paul Wilson
President and Chief Executive Officer
# Table of contents

## COMPLIANCE AND ETHICS
- Noridian Values and Behaviors
- Integrity
- Ethical Leadership and Accountability
- Risk Management and Internal Control
- Legal and Regulatory Compliance
- A Commitment to Compliance and Ethics
- Performing with Integrity

## REPORTING YOUR CONCERNS
- Why You Should Report
- Identifying and Addressing Concerns
- Speak Up
- Guide to Reporting
- Anonymity and Confidentiality
- Investigation of Reports
- No Retaliation Policy
- Reporting Outside of Noridian
- Disciplinary Actions

## CONFLICTS OF INTEREST
- Outside Employment or Activities
- Conflicts of Interest Disclosure Statement
- Use of Information or Assets
- Business Dealings
- Business Courtesies
- Entertainment of or by Non-government Personnel
- Internal Gift-Giving
- Prizes
- Honorariums
- Business Courtesies in Foreign Countries

## PROTECTING ASSETS AND INFORMATION
- Confidentiality and Data Security
- Proprietary Information
- Intellectual Property and Software Licensing Agreements
- Truthful and Accurate Reporting
- Anti-Fraud Program
- Records Management
- Audits

## POLITICAL ACTIVITIES AND CONTRIBUTIONS

## THE GOVERNMENT: A UNIQUE CUSTOMER
- Dealing with Excluded or Ineligible Persons
- Bidding on Government Contracts
- Avoidance of Organizational Conflicts of interest
- Purchasing Rules
- Contingent Fee Arrangements
- Payments to Agents and Consultants
- Subcontracting
- Submission of Claims, Statements and certifications
- Entertainment and Business Courtesies and Gifts for Personnel
- Bribes, Gratuities, and Kickbacks
- Cost Records, Price Estimates And Time Charging
- Unallowable Costs
- Self-Reporting and Disclosure Obligations
- Protection of Government Property
- Compliance with Antitrust Laws
- Government Investigations
- Employment of Former and Current Government Personnel

## SAFE AND RESPECTFUL WORKPLACE
- Notice to Employees Concerning Whistleblower Rights and Remedies under 41 U.S.C.§ 4712
- Background
- Policy
- Reporting to Federal Agency
- Reporting to Noridian
- Reporting Options
Section 1

COMPLIANCE AND ETHICS

NORIDIAN VALUES AND BEHAVIORS

Noridian’s purpose is to design and deliver solutions that enhance the administration of government healthcare programs. Noridian’s values and behaviors are at the heart of how we operate to achieve our mission and objectives. These values include:

- **Constant Innovation**
  We seize opportunities to advance progressive change.

- **Service Excellence**
  We provide value through quality service.

- **Responsible Stewardship**
  We manage all resources entrusted to us with efficiency and care.

- **Effective Collaboration**
  We work together toward a common purpose.

- **Integrity**
  We do the right thing.

INTEGRITY

We have an unwavering commitment to integrity in all we do. The Code of Conduct defines what Noridian expects of us and is a resource you can rely on to figure out what is right when it comes to acting with integrity in the workplace. You can rely on the following principles of integrity as a path to what is proper in most work situations, regardless of the job at hand:

- Always strive to do the right thing and be accountable for our actions.

- Care not only for the end result, but also how we obtain it.

- Be trustworthy and honest. Observe all laws and regulations, but lawful behavior is not enough on its own.

- Value credibility in relationships with our customers, vendors, and business partners.

Did you know?

The Board of Directors has appointed Kara Kirkeby as Vice President of Compliance and Audit and Noridian’s Compliance Officer. As the Compliance Officer, Kara is responsible for overseeing and enforcing the Compliance and Ethics Program. You may contact Kara or the Compliance and Ethics Department with any questions or concerns you may have about compliance and ethics.
ETHICAL LEADERSHIP AND ACCOUNTABILITY

Noridian’s management is committed to living up to the high standards of ethical behavior. Ethical leadership at Noridian begins with the Board of Directors and senior leaders setting the ethical direction. By adopting integrity as one of Noridian’s core values, our leaders aspire to support a culture that embraces the principle of not only doing the right thing, but also doing things the right way.

Leaders, because of their positions of authority, have added responsibilities. An important part of a leader’s responsibility is to set the standard for outstanding business practices. We expect leaders to reflect Noridian’s commitment to integrity in both words and actions. As a leader, you should set the tone for integrity:

- Promote open and honest two-way communication.
- Be a role model who shows respect and consideration for everyone and actively promotes Noridian values.
- Create and maintain an environment where everyone feels comfortable asking questions and reporting concerns.
- Encourage everyone to ask questions, make suggestions, and report compliance and ethics concerns without fear of retaliation.
- Help everyone understand how the Code of Conduct applies to their positions and everyday behavior.

RISK MANAGEMENT AND INTERNAL CONTROLS

We share a responsibility to identify and properly manage business risks. We manage risks by implementing and supporting internal controls to ensure that our operations are conducted consistently with Noridian’s values, objectives, and obligations.

Internal controls is a system of planned actions that are built into our business processes and executed to provide reasonable, but not absolute, assurance regarding the achievement of our business objectives. Internal controls is meant to:

- Promote the effectiveness and efficiency of operations.
- Ensure reliability of financial and operational reporting.
- Maintain compliance with applicable laws and regulations.

Safeguarding assets, meeting contractual requirements, including Medicare program requirements, and complying with internal policies and procedures are included within these three objectives.

Management is responsible for implementing and monitoring internal controls. We are all expected to know and follow the internal controls that impact our day-to-day responsibilities.

“Integrity is not the absence of lying. Rather, it is telling the whole truth, so that we can gather together the best people in the company to solve the problem.”

-Bill George, author

To report a violation of the Code, call 888-264-2227.
LEGAL AND REGULATORY COMPLIANCE

Noridian is subject to a wide variety of federal, state, and local laws and regulations including special rules that apply to Noridian because we are a government contractor. We are all expected to follow these laws and the company policies that apply to our work.

We are each responsible for asking questions when we are uncertain about the legality or correctness of particular conduct. If you are ever in doubt about any action, be sure to seek guidance from your manager or the Compliance and Ethics Department or through the Compliance and Ethics Hotline.

No instruction, excuse, or pressure justifies breaking the law or encouraging someone else to do so. No one should ever believe breaking the law to help Noridian, its customers, business partners, or vendors is the right thing to do. Anyone who violates the Code will be subject to disciplinary action, up to and including termination. Violations of laws and regulations can expose associates and/or Noridian to criminal, civil and/or administrative sanctions.

A COMMITMENT TO COMPLIANCE AND ETHICS

The Compliance and Ethics Program is an important part of Noridian’s governance structure. It shows our Board of Directors’ commitment to the highest standards of compliance and ethics.

The Compliance and Ethics Program includes several processes that are designed to help fulfill the Board of Directors’ commitment to compliance and ethics.

These include:

- The Code and other company policies and procedures.
- Training and communications.
- Investigations of alleged wrongdoing.
- Disciplinary measures for violations of company policies.

To show your commitment to the Compliance and Ethics Program, you should complete Compliance trainings and assignments in a timely manner.

PERFORMING WITH INTEGRITY

Everyone is expected to maintain high ethical standards, conduct Noridian business with integrity, and work in compliance with Noridian policies and the law. We must uphold Noridian’s commitment to fostering a culture of ethical behavior:

- Read, understand, and comply with the Code, applicable laws and regulations, and Noridian policies.
- If uncertain about how to proceed, seek guidance to resolve your ethics and compliance questions and concerns.
- Report violations of the Code, policies, and laws and regulations.
- Be truthful and cooperate fully in any investigation or audit.
- Complete annual training on the Code and attest to your understanding and commitment to the Code. Failure to read or attest to the Code does not excuse anyone from the responsibility to comply.
Section 2
REPORTING YOUR CONCERNS

WHY YOU SHOULD REPORT

We each have a role to play and are accountable to each other to help Noridian fulfill its obligation to offer its products and services to its customers by following applicable laws, contractual terms, and the highest ethical standards.

We’ve all seen situations when people knew something was wrong but did not want to get involved. As a result, the situation was never fixed. You should report a potential compliance concern so the Compliance and Ethics Department can address it. Speak up immediately and report to your supervisor or management if you see or suspect activity that may be a violation of Noridian’s Code of Conduct, company policies, law, regulation, or contractual requirements. You ensure the continued success of Noridian by making certain your actions support our culture and you expect the same of those around you.

If the Company’s attorneys believe the Company is in violation of any state or federal law or breach of fiduciary duties, they will address those concerns. The Company’s attorneys should report the material violation to the Chief Legal Officer, Chief Executive Officer, and/or Compliance Officer.

As a federal government contractor, Noridian also has an obligation to report if it has credible evidence of violations of certain federal laws or identifies a breach in security or confidentiality. Noridian can only address problems and errors and meet these obligations through open communication.

Did you know?

The purpose of reporting concerns to the Compliance and Ethics Department is not to cast blame. Indeed, many reports to the Compliance and Ethics Department are from individuals who self-report an honest mistake that may constitute a violation of law.

This reporting is appropriate and expected. The Compliance and Ethics Department’s primary objectives are to educate, ensure corrective actions are taken, and reduce risks to the Company, not place blame on individuals.
IDENTIFYING AND ADDRESSING CONCERNS

The Company does not expect each of us to have the answer to every ethical question, but it does expect each of us to know when to ask for help and where to go for help.

If you’re ever faced with a difficult situation and are unclear about the right decision or unsure if it complies with the Code, ask yourself:

- Is it legal?
- Is the action consistent with our values, the Code, contractual requirements and/or other Noridian policies?
- Would I feel comfortable if this information appeared on the front page of the local newspaper?

If the answer to these questions is “yes,” the decision to move forward is okay, but if the answer to any questions is “no” or “I’m not sure,” stop and speak up.

SPEAK UP

If you are aware of actual or suspected noncompliance with laws, regulations, contractual requirements, the Code and/or other Noridian policies, report your concern. It is important to report concerns immediately so that an effective evaluation can be conducted.

If a member or manager receives a report or otherwise becomes aware of actual or suspected noncompliance, that manager must report the information to the Compliance and Ethics Department.

Any attempt to prevent or otherwise interfere with a person’s efforts to report an incident is prohibited.

Discuss with your immediate supervisor: Discuss the concern with an immediate supervisor and give them a chance to solve the problem.

Discuss with a higher level of department management: Discuss the concern with a higher level of department management.

Discuss with Compliance: You may discuss the concern with the Compliance Officer or another member of the Compliance and Ethics Department. Contact Compliance and Ethics Personnel:

- By telephone
- By e-mail (noridiancompliance@noridian.com)
- In-person

Report Anonymously: If you are not comfortable talking to Compliance and Ethics personnel directly, you may use one of the following anonymous reporting mechanisms:

- Openboard e-reports (www.openboard.info/nmic)
- Compliance Post Office Box: Compliance, PO Box 242, West Fargo, ND 58078-0242
- Interoffice mail router
- Drop-box (Fargo only)
- Compliance Hotline 888-264-2227

GUIDE TO REPORTING

- Describe the situation in detail and include the business area and people involved.
- Identify dates when events occurred.
- Let us know if you saw this directly or if someone told you about it.
- Tell us how the situation occurred (e.g. Was a policy not followed? Was someone told to do something inappropriate? Describe any relevant documents or other references that could be helpful.)

Noridian has contracted with a vendor to support the Compliance Hotline and web form. The vendor receives calls made to the Compliance Hotline, records the message, and distorts the caller’s voice to protect his or her identity. The vendor provides Compliance with the distorted message.

You will receive a 14 to 16-digit code when you make a report through the vendor. Compliance personnel may use the vendor’s secured website to leave messages for you, and you may respond using the

Kara Kirkeby
(701) 282-1498
Kara.Kirkeby@noridian.com

You should always feel comfortable raising any compliance or ethics-related question or concern with the Compliance Officer. Although you have the option to first discuss the concern or question with your supervisor or management, you are always entitled to speak directly to the Compliance Officer.

To report a violation of the Code, call 888-264-2227.
same website and your 14 to 16-digit code. Sometimes it may seem easier to look the other way when you notice what appears to be a violation but doing nothing can result in serious consequences. When you speak up about unethical or illegal behavior, you are saying an honest and ethical workplace matters to you.

For more information on reporting, visit the Compliance, Privacy, and Ethics SharePoint site.

ANONYMITY AND CONFIDENTIALITY
You may remain anonymous when making a report. The Compliance and Ethics Department encourages you to give your name in case we need to obtain more information to fully investigate the report. If we do not have enough information, we may not be able to act. If you choose to remain anonymous when making a report you should provide as much detail as possible, including a full description of the situation, business area, and people involved, as well as how the situation occurred and identification of any relevant or helpful documents.

Use the Compliance Hotline, web form (www.whistleblowerservices.com/nmic), PO Box, Compliance drop boxes, or interoffice mail routers to report anonymously.

We keep communications confidential to the extent possible; however, there may be limited situations where we are not able to do this based on the nature of the allegations or the outcome of an investigation. It may be necessary to advise senior management and our contracts may require us to contact law enforcement officials or regulatory agencies.

INVESTIGATION OF REPORTS
When you contact the Compliance and Ethics Department, we will address your concern promptly and fairly. Staff in the Compliance and Ethics Department are authorized to investigate reports and make sure there is a proper resolution. For confidentiality reasons, we may not be able to inform you of the outcome of the investigation. We will contact you, when possible, to advise the investigation is closed. Everyone should cooperate with the investigation of an alleged violation of the Code of Conduct, company policy, or the Compliance and Ethics Program.

The Compliance and Ethics Department can refer reports or investigate in collaboration with staff from Legal, Human Resources, and Security.

NO RETALIATION POLICY
Noridian maintains a strict No Retaliation Policy. Open communication of issues and concerns, without fear of retaliation, is vital to the success of our Compliance and Ethics Program. Anyone who reports a potential violation or cooperates with an investigation is protected from retaliation (e.g. intimidation, harassment, unwarranted demotion, termination, etc.).

No individual’s position or influence is more important than the core value of institutional integrity.

REPORTING OUTSIDE OF NORIDIAN
In certain circumstances, we may be required to report legal and contract violations to our customers, business partners, and/or the appropriate regulatory or oversight authorities. This obligation increases the importance of immediately reporting concerns of wrongdoing.

DISCIPLINARY ACTIONS
Disciplinary actions for violations of the Code or other Noridian policies will be applied in accordance with the Employee Handbook.

To report a violation of the Code, call 888-264-2227.
Section 3

CONFLICTS OF INTEREST

Noridian respects your right to manage your affairs and investments and recognizes you may take part in financial, business, and other activities outside of your job. The principles described in this and throughout the Code are intended to ensure decisions are objectively based on what is best for Noridian and are not influenced by personal interests.

A conflict of interest occurs when a personal situation may compete with the interests of Noridian and our customers, including the federal government. For example, personal interests may arise through family and/or financial relationships, especially relationships involving individuals or entities that compete with or may do business with Noridian. We should not put ourselves into situations where questions may arise about our objectivity or ability to be unbiased, as even the appearance of a conflict of interest is prohibited in federal contracting.

If you think you or someone else has a conflict of interest, or there is the appearance of one, the most important thing to do is to tell your supervisor and/or the Compliance and Ethics Department so we can review and document the circumstances. In most circumstances the potential conflict can be resolved.

We are required to report certain conflicts of interests as part of our contract requirements.

OUTSIDE EMPLOYMENT OR ACTIVITIES

You must avoid outside employment or activities that would have a negative impact on the performance of your job, conflict with your obligations to Noridian, or in any way negatively affect Noridian or its reputation in the community.

Activities relating to outside employment cannot be conducted during working hours. Outside employment that Noridian determines to be in conflict with the business interests of the Company, in violation of the Code, or inconsistent with the duties of an associate's position with Noridian, can lead to disciplinary action, including termination of employment.

If you have questions on outside employment or activities, talk with your supervisor or the Compliance and Ethics Department before you accept the outside employment or activity.
SCENARIO | SOLUTION

**Q:** I work as a claims processor, and I need some extra income. I have the opportunity to work part-time (on weekends) for a physician’s office doing medical billing. Is it OK for me to pursue this type of employment?

**A:** This type employment raises at least the appearance of a conflict of interest. It may put you in a position to submit claims to the Medicare program on behalf of the physician’s office. Because Noridian pays Medicare claims, you may be in a position at Noridian to influence the payment of the physician’s claims. The Compliance and Ethics Department would need to evaluate your current work duties at Noridian and compare them to your work duties at the physician’s office. Compliance staff would work with your supervisor in this evaluation. Depending on the outcome of the evaluation, you may need to decline the outside job or agree to abide by a mitigation plan.

USE OF INFORMATION OR ASSETS

We may not use information we learn in our jobs for personal investment or gain, nor may we provide this type of information to family members or others. We are all responsible for making sure that Noridian assets are used only for valid business purposes. Noridian assets include not only equipment, inventory, corporate funds, and office supplies, but also concepts, business strategies and plans, financial data, beneficiary and provider information, intellectual property rights, and other business information.

Electronic communication systems, including phones, voicemail, fax machines, and email must be safeguarded against abuse or unauthorized access. Noridian owns these systems, and associates have no expectation of privacy when using these systems. We may not use Noridian systems to access, store, download, or distribute unauthorized or personal materials, such as software and music or materials that are threatening or malicious, criminal or sexually explicit.

BUSINESS DEALINGS

Noridian strives to maintain the highest standards of integrity and objectivity in its business dealings with vendors and service providers. Relationships with vendors and service providers are based on the cost and quality of the products and/or services they provide, rather than on our own personal interests. An associate, officer or board member that has or may appear to have a personal interest in the outcome of a Noridian decision should be excused from the decision-making process relative to his or her personal interest.

Our Purchasing Policy sets forth standards relating to competitive bids and other purchases. The review and acceptance of such bids should be made by those who are free from conflicts of interest.

SCENARIO | SOLUTION

**Q:** My family member had a job change that could be a conflict with my job. Do I report it right away or wait for the annual disclosure process?

**A:** Report these types of changes to your supervisor and the Compliance and Ethics Department right away.
A: Yes, but only if you are not involved in the decision-making process and those who are objectively making the decision determine that doing business with this new supplier is in the best interest of Noridian. If Noridian starts doing business with this supplier, you must remove yourself from making decisions about or performing work related to the vendor.

If you have questions, contact the Compliance and Ethics Department.

BUSINESS COURTESIES

A business courtesy is a gift or favor for which we pay less than fair market value or nothing at all. It may include the following items:

- Gifts, including travel
- Transportation
- Discounts
- Tickets
- Passes
- Promotional items
- Use of a giver’s time, materials or equipment

Business courtesies offered to or received from individuals and entities with which we do business, or may do business, can create the appearance that our business decisions were influenced by these business courtesies. Therefore, we must carefully evaluate the circumstances in which business courtesies are offered and received.

We may never offer or accept gifts or business courtesies that could be construed as kickbacks or bribes. Kickbacks and bribes can take many forms and are not limited to direct cash payments or credits. In general, if you or your family could gain personally through the transaction or the offer is made for the purpose of improperly obtaining or rewarding favorable treatment in connection with a purchase or sale of goods and services or the award of business, it is prohibited. These practices are not only unethical, but in many cases they are illegal.

Examples of kickbacks or bribes may include fees, commissions, rebates, gratuities, gifts, or any other items of value.

Kickbacks could be disguised as:

- An offer for a large discount on electrical work at a personal home for contracting with an electrician for Noridian.

- Use of XYZ’s company condominium in Florida for a weeklong vacation after renewing XYZ’s group.

- A free night’s stay at a hotel for booking a convention on behalf of Noridian.

Non-monetary business courtesies are common in the commercial market. Business courtesies of nominal value (those with a fair market value of $50 or less) are generally acceptable as long as they are infrequent and not seen to threaten our objectivity when making decisions. Examples include promotional items, trinkets, candy, nuts or other food items. To help maintain our objectivity, we are each limited to no more than $150 in nominal business courtesies annually from a single vendor.

SCENARIO | SOLUTION

Q: For years my department has notified vendors when we are having our annual divisional outing so the vendor could donate prizes. Is this OK?

A: No, we are not allowed to solicit business courtesies from a vendor we do business with or seek to do business with.

SCENARIO | SOLUTION

Q: What if a vendor offers me multiple gifts, where each individual gift is nominal (fair market value of $50 or less)?

A: If the vendor offers you multiple nominal gifts in one offer, these gifts would not be considered “nominal” if the collective value of the gifts exceeds $50. If the offer of nominal gifts occurs over multiple offers (e.g. on three separate occasions during the year), you may be permitted to accept these gifts; however, the value of what you receive annually from this vendor cannot exceed $150.

If there are circumstances where you wish to accept or offer a more substantial business courtesy (fair market value over $50), you should report the matter to the Compliance Officer for consideration in light of protocol or other special circumstances. Remember, even if a business courtesy has a value of less than $50, it should not be offered or accepted if it appears to be intended to influence a business decision or to gain favor.

To report a violation of the Code, call 888-264-2227.
SCENARIO | SOLUTION

Q: The consulting firm that recently assisted us in completing an important project has presented us with commemorative engraved pen and pencil sets with a value of less than $50. May we accept them?

A: Yes. The business courtesies are considered “nominal” in value and would not reasonably appear to be intended to influence a business decision or gain favor.

ENTERTAINMENT OF OR BY NON-GOVERNMENT PERSONNEL

Entertainment includes meals, recreation, sporting events, music events and other forms of entertainment. We may not encourage or solicit entertainment from any individual or company with whom we do business. We do not offer or accept entertainment that is intended to gain favor or influence actions.

Occasionally, we may provide or accept entertainment, but only if the entertainment is:

- Reasonable in kind
- Occurs infrequently
- Does not involve lavish or extravagant expenditures

SCENARIO | SOLUTION

Q: All attendees at a work-related conference were invited to dinner hosted and paid by the conference organizer. May I accept the invitation?

A: If offered to all attendees at no additional cost, the dinner would be considered legitimate business activities and may be accepted provided it does not involve lavish or extravagant expenses or otherwise present a risk of influencing Noridian decisions.

INTERNAL GIFT-GIVING

We generally discourage anyone giving gifts to their direct or indirect supervisors.

SCENARIO | SOLUTION

Q: The Company is very interested in a vendor’s products. I was invited to a trip to San Diego for a training class to learn more about the products. The vendor has offered to pay for my hotel and airfare. May I accept their offer?

A: Each situation is different, so you should always consult with your management and the Compliance Officer. In this scenario, it appears attending the training class would be in the best interest of the Company. It would be appropriate to attend, but only if the Company pays for the travel and hotel expenses. Allowing the vendor to pay for the trip may create the appearance of a conflict of interest and could adversely affect the Company’s reputation. We cannot let vendors pay for travel expenses without prior approval from the Compliance Officer.
Tickets to sporting and music events generally should not be accepted. Requests to accept tickets to sporting or music events must be submitted to the Compliance Officer, who will evaluate the requests in light of the circumstances.

For more information regarding entertainment of Government personnel, turn to Section 6.

**SCENARIO | SOLUTION**

**Q:** A vendor has offered me four tickets to the ball game. May I accept this gift?

**A:** Before accepting an offer like this, consult with the Compliance Officer, who will assess the offer in light of the legitimate business purpose, if any, and other factors.

**PRIZES**

Generally, prizes are not considered business courtesies and may be accepted. However, those of more than a nominal value (fair market value over $50) must be reported to the Compliance Officer for review.

As with business courtesies, prizes of any value must be declined if they could reasonably be perceived as primarily intended to influence a business decision. **Factors considered may include, for example, the value and nature of the prize and whether the associate has decision-making authority to potentially engage the entity that offered the prize.**

**SCENARIO | SOLUTION**

**Q:** At a work-related conference, my name was entered in a random drawing and I won an iPod Touch, valued at $295. May I keep this prize?

**A:** You will most likely be able to keep the prize. However, you need to report this prize to the Compliance Officer. The Compliance Officer will review the circumstances under which you won the prize and confirm whether or not you may keep it.

**HONORARIUMS**

We may be asked to participate in external forums, conferences or advisory boards. Invitations to participate in such capacities often include honorariums such as the payment of registration, travel and/or lodging expenses. If there is no actual or potential conflict of interest, we generally permit associates, subject to supervisor approval, to accept such offers. If more than a nominal (fair market value over $50) honorarium is involved, you must contact the Compliance Officer for review and prior approval of the circumstances.

**BUSINESS COURTESIES IN FOREIGN COUNTRIES**

Our commitment to compliance extends to all international requirements as well. Noridian is subject to the Foreign Corrupt Practices Act, which generally prohibits us from offering, promising, making, or authorizing payment of anything of value to a foreign official for the purpose of obtaining or retaining business. There is no minimum value to trigger the Foreign Corrupt Practices Act—any payment made for wrongful purposes can be a violation. Associates are therefore prohibited from offering, giving, promising to give, or authorizing gifts of payments to foreign officials.

In certain circumstances, Noridian may be permitted to provide nominal business courtesies to foreign officials. The Legal Department must review and approve any business courtesy to a foreign official in advance and in writing.

**Report any honorariums over $50 to the Compliance and Ethics Department**

To report a violation of the Code, call 888-264-2227.
CONFIDENTIALITY AND DATA SECURITY

Confidential information is one of the most valuable assets entrusted to us. We must be diligent in making sure that confidential information is properly accessed, used, shared, stored, and destroyed. To be diligent, we all must do two things: Know what is considered confidential and know how to protect information.

Our Confidentiality Policy defines four classes of confidential information to help you understand what information is considered confidential:

- **Protected Health Information (PHI):** Individually identifiable health information, including demographic and genetic information, which relates to the health of an individual or the payment for health care services.

- **Personally Identifiable Information (PII):** Any information about an individual including, but not limited to, education, financial transactions, medical history, criminal or employment history, and information that can be used to distinguish or trace an individual’s identity.

- **Proprietary Information:** Information other than Protected Health Information that is used or created by Noridian while conducting business, and is not normally made available to customers, competitors, or third parties.

- **Centers for Medicare & Medicaid Services (CMS) Sensitive Information:** Medicare or Medicaid-related information that requires safeguarding against disclosure to unauthorized persons. This includes individually identifiable information protected by the Privacy Act and HIPAA, federal tax information, financial information, and other Medicare/Medicaid information as specified by CMS/state agencies.

Confidential information is protected by federal and state laws, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act and the Privacy Act.

Noridian must report suspected and confirmed misdirected, lost or stolen Protected Health Information, and Personally Identifiable Information to CMS within one hour of discovery. Report these
events immediately to the Compliance and Ethics Department. Please refer to your department’s procedures for additional instructions.

You must report lost or stolen mobile media immediately to the Noridian Service Desk at 866-533-7159, or after hours to the security professionals at 701-282-1011.

If we fail to make timely disclosure of such violations, associates and/or Noridian may receive sanctions, including losing a contract and/or being suspended or debarred from federal programs, such as the Medicare Program.

The Compliance Officer, Privacy Officer, General Counsel and others, as appropriate, will determine when reporting to external authorities or parties is necessary.

Noridian’s guiding philosophy is to comply with all applicable federal and state laws and regulations related to privacy and data security, and any further privacy and data security obligations prescribed under Noridian’s contracts. Generally, to protect confidential information:

- Do not share confidential information with friends, family members, or former Noridian associates.
- Do not discuss confidential information in public places where you could be overheard.
- Do not work with documents containing confidential information in public places.
- Do discuss confidential information with other associates only on a need-to-know basis.
- Do always restrict access to confidential information—whether held electronically or in hard copy.

**PROPRIETARY INFORMATION**

In addition to following privacy and security laws and regulations, we must also protect our proprietary information.

**SCENARIO | SOLUTION**

Q: You send a draft bid to your home email address to work on it from home. Is this allowed?

A: No. While bids do not contain PHI/PII, it is Proprietary Information and should not be sent outside the Noridian network.

For more detail about your obligations, refer to Noridian policies about protecting confidential information:

- A comprehensive set of Privacy Policies and Security Policies provides information on protecting all forms of confidential information. These policies also provide direction on how we can appropriately use our information systems.
- The Contract Review Policy requires written agreements with vendors and service providers. We must assure these agreements include confidentiality standards to protect our information.
- The Social Media Policy sets forth clear guidelines so that you understand your responsibilities in social media—both for work purposes on work time, and for personal use that relates to or reflects upon any Noridian organization.

Remember, you are responsible for maintaining the confidentiality of information even after you are no longer associated with Noridian.

**INTELLECTUAL PROPERTY AND SOFTWARE LICENSING AGREEMENTS**

It is very important that we understand and follow the rules that govern the use of our intellectual property or the intellectual property of others. Intellectual property results when creative thoughts become protected under applicable patents, trademarks, copyrights or other proprietary information laws and regulations.

We must be careful to follow the software licensing agreements we have entered into or accepted. Most software licensing agreements contain restrictions regarding the use of the software.

Any unauthorized use of protected intellectual property or unlicensed software could subject us to significant financial penalties and possible civil and criminal penalties.
TRUTHFUL AND ACCURATE REPORTING

Noridian’s records include all documents and electronic media that record or reflect any activity or transaction by our associates, officers and board members.

These records are critically important in meeting our financial, legal, and contractual obligations and must always be prepared accurately and reliably.

The information we record and report must be truthful and accurate whether the information involves:
- Time worked
- Accurate business expenses
- Production or performance data
- Any other business-related activities on which we record and report

We must never alter or falsify information in any record or document that misrepresents the facts. In connection with contracts, we must not:
- Distribute or assign costs to contracts that violate the contract’s provisions or do not follow applicable accounting rules.
- Inaccurately report labor costs, submit or instruct another person to submit false time charges, or assign costs to the wrong contract.

We must not use any of Noridian’s funds or assets for any unlawful or unethical purpose. In addition, payments cannot be made to anyone for any purpose other than that disclosed on payment documentation.

ANTI-FRAUD PROGRAM

Fraud, waste, and abuse may occur in many ways and involve:
- Provider and beneficiary claims
- Overutilization and underutilization
- Misrepresentation of provider application information
- Misuse of corporate assets
- Other types of fraud

We are committed to identifying, preventing, correcting, and reporting fraud, waste, and abuse. The efforts undertaken as part of these processes are collaborative in nature and involve training and education, internal controls, including automated claims system checks, monitoring, audits, investigations, and more. All activities are consistent with applicable laws, regulations, and government health care program requirements.

RECORDS MANAGEMENT

We all have responsibility to follow our Records Management Program. This program addresses the maintenance, retention, and destruction of records in accordance with legal requirements, regulations, and business practices. The Records Management Policy further describes our responsibilities. A government investigation, lawsuit, or court order may impose additional records management requirements. When this occurs, we must carefully follow the procedures established by the Records Retention Committee or Legal Department. Inappropriate destruction of records could constitute a crime.

SCENARIO | SOLUTION

Q: If I believe I need to use a certain record past the scheduled destruction date, should I retain a personal copy?

A: Ordinarily, associates should not keep personal copies of documents that are scheduled for destruction. Most, if not all, records will be destroyed in accordance with a specific schedule. This schedule depends on a number of factors, such as legal and business requirements, whether the document contains business information or patient medical data and the like. If you believe a certain record or category of records should be kept longer, discuss it with a supervisor.

Q: My supervisor asked me to shred information that I know must be retained. I reminded him about the Company’s Records Management Policy, but he said this is an extenuating circumstance and insisted I shred them. I don’t want to be charged with insubordination. Should I shred the documents?

A: Don’t shred the documents. Retention of corporate records is not optional, and no one is permitted to make an exception to our policies. There are avenues to report this type of conduct and personnel who can help handle these types of situations. Bring this information to the attention of the supervisor’s manager, the Compliance Officer, or call the Compliance Hotline at (888) 264-2227.

AUDITS

We are all expected to cooperate with any audit. Such cooperation requires accuracy, candor, and responsiveness. Additionally, when we are audited, we must never try to influence, pressure, or manipulate any auditor to make false or misleading financial statements or other information. Examples of audits include those required by law (e.g. Chief Financial Officer Audit), by contract (e.g. Medicare audits), or by our Company (e.g. internal audits).
Our ability to participate in political activities is controlled by federal and state law. These laws restrict the use of Noridian’s assets in connection with federal, state, and local elections. Accordingly, we may not include political contributions on expense reports, engage in personal political fundraising on company time, or use Noridian assets for political purposes in any way. Any organizational political activity must first be reviewed and approved by the Legal Department.

We encourage everyone to participate in the political process outside of work. Those who do this should always make it clear they are participating on their own time and expense, and do not speak for Noridian.
Section 6
THE GOVERNMENT: A UNIQUE CUSTOMER

Our state and federal government work is a vital part of our business. It is critical that we recognize the broad legal principles and strict standards that apply to everyone who charges time to or otherwise supports government work.

This Section offers an introduction to many of our legal responsibilities as a government contractor.
DEALING WITH EXCLUDED OR INELIGIBLE PERSONS
Federal government programs prohibit us from contracting or doing business with any person or entity that is currently debarred, suspended, excluded, proposed for debarment, or declared ineligible to perform work under any government contract or subcontract.
Therefore, we will not knowingly employ or contract with anyone who has been convicted of a criminal offense involving government business, listed by a federal agency as suspended, debarred, excluded, proposed for debarment or suspension, or otherwise excluded from participating in federal programs.
We make reasonable inquiry into the status of all prospective associates against the Department of Health and Human Services Office of Inspector General’s List of Excluded Individuals/Entities, the General Services Administration System for Award Management, and the Office of Foreign Assets Control List of Specially Designated Nationals and Blocked Persons. Medicare contracts require periodic reinvestigations and background checks for everyone who handle Medicare-sensitive data. We promptly investigate those identified on these sanction lists and take appropriate action to comply with government regulations.

BIDDING ON GOVERNMENT CONTRACTS
We are subject to specific legal requirements when we bid on or negotiate federal contracts. The federal Truth in Negotiations Act, also known as the Truthful Cost or Pricing Data Act, requires us to certify that our cost and pricing data is “current, accurate, and complete.” Antitrust laws require that we certify that we do not engage in anticompetitive practices. Refer to the “Compliance with Antitrust Laws” section of the Code for more details.
The federal Procurement Integrity Act specifies conduct for companies bidding on federal government contracts:
• We may not offer to discuss employment or business opportunities with government procurement officials.
• We may not seek confidential information from third parties such as government selection criteria or a competitor’s bid or proposal information. If you receive these types of confidential information, do not share the information with anyone, and immediately notify the Compliance and Ethics Department.

AVOIDANCE OF ORGANIZATIONAL CONFLICTS OF INTEREST
Federal Organizational Conflict of Interest (OCI) rules prevent a company from competing for work or providing services to the federal government if the Company:
• would be unable to provide impartial assistance or advice;
• has an unfair competitive advantage because it set the ground rules for the competition; or
• has an unfair competitive advantage because it has unequal access to non-public information relevant to the competition.
Noridian does not accept work that creates an OCI or appearance of an OCI with other client work without first adopting a government-approved OCI mitigation plan.
If you identify a potential OCI regarding current work or work Noridian is considering performing, contact the Compliance Officer.

PURCHASING RULES
Our Purchasing Policy includes procedures for complying with procurement laws and regulations when making purchases for or entering into government contracts. The Policy ensures that we pay the appropriate costs for goods and services and avoid conflicts of interest. We also follow the government’s policy that contractors offer small businesses the maximum opportunity to participate in our federal contracts.
CONTINGENT FEE ARRANGEMENTS

The federal government prohibits the payment of a contingent fee or any commission, percentage, brokerage, or other fee that is based upon the success a person or entity has in securing a government contract.

There is an exception to this prohibition. The federal government allows contingent fee arrangements between contractors and a “bona fide agency” or “bona fide associate.” Examples would be situations where there are legitimate services associated with seeking the contract, such as identifying customer opportunities, reviewing requests for proposals, becoming familiar with the contractor’s services and assisting with the preparation of the proposal.

Noridian will not enter into any agreement requiring payment of an improper contingent fee. Immediately contact the Compliance Officer or Legal Department if you are approached about entering into a contingent fee or sales representative arrangement.

PAYMENTS TO AGENTS AND CONSULTANTS

Agreements with agents or consultants must be in writing. Such agreements must clearly and accurately set forth the services to be performed, the basis for earning the commission or fee involved, and the applicable rate or fee. Any such payments must be reasonable in amount, not excessive in light of the practice in the trade, and commensurate with the value of the services rendered.

SUBCONTRACTING

We may act as a subcontractor in government contracts, or we may subcontract core functions of our government contracts to other entities.

Noridian as a Subcontractor

When Noridian is a subcontractor under a prime government contract, we must follow our agreement with the prime contractor (or higher-tier subcontractor). We also must collaborate with the prime contractor regarding the applicable government regulations and prime contract terms and ensure our compliance with these terms.

Lower Tier Subcontractors

Noridian is ultimately responsible for our subcontractor’s actions. Therefore, we must make sure subcontractors working on our government contracts comply with government regulations and contract requirements. Our agreement with

To report a violation of the Code, call 888-264-2227.
a subcontractor will allocate responsibilities, which will include the flow down of mandatory government contract clauses from our prime contract. When we subcontract work, we are required to report certain subcontractor violations of law. Consult the Medicare Subcontracting Requirements for more information in this area.

SUBMISSION OF CLAIMS, STATEMENTS, AND CERTIFICATIONS
Customer communication must be truthful, accurate, complete, verifiable, and in accordance with Noridian policies. This is especially true when communicating with federal government officials or representatives. It is a felony to knowingly submit false claims, statements, or certifications to the federal government. Such conduct may subject both Noridian and individual to civil and criminal sanctions, including fines, prison, and suspension or debarment from federal contracting.

The federal government frequently uses (and relies on) representations and certifications from contractors regarding the existence of certain facts. Noridian's Senior Executive Officers (President/CEO, Executive Vice Presidents, and Senior Vice Presidents) are the only people at Noridian authorized to execute certifications on behalf of Noridian or approve the submission of pricing information to a federal prime contract or subcontract customer.

No submission of Noridian information relating to a government procurement, or representations and/or certifications (oral or written) may be made without prior approval from either the Legal Department or a Senior Executive Officer, or their designee, including the System for Award Management (SAM). Such confidential or proprietary information must be appropriately marked with restrictive legends to prevent unauthorized use and/or disclosure by the government or third parties.

The Legal Department must review any request received from a federal government entity, a prime contractor, or higher-tier subcontractor. This includes subpoenas received from a court.

ENTERTAINMENT AND BUSINESS COURTESIES AND GIFTS FOR PERSONNEL
Strict rules apply to offering or providing entertainment or business courtesies to government personnel. Consult with the Compliance and Ethics Department before providing business courtesies to government personnel. Generally, a meal or other business courtesy valued at more than $10 or a number of meals or other business courtesies valued together at more than $50 are prohibited.

Bribes, Gratuities, and Kickbacks
We must not offer or provide anything of value for the purpose of giving, receiving, or rewarding favorable treatment in connection with government programs.

Examples of favorable treatment
• Disclosure or receipt of confidential information relating to competitive bids
• Inclusion as a bidder without meeting the required qualifications
• Removal of a qualified competitor from a bidder’s list
• Improper award of a contract
• Recovery of improper or unallowable costs

COST RECORDS, PRICE ESTIMATES, AND TIME CHARGING
We are required to keep accounting and other contract records and provide access to the government or its prime contractors. This allows the government to verify work performed and payments made under our government contracts. This also helps verify our cost and pricing estimates on future contracts.

To report a violation of the Code, call 888-264-2227.
UNALLOWABLE COSTS
We may submit proposals for reimbursement of indirect costs to the government either under cost reimbursement contracts or as part of our overhead rates. We must never ask for reimbursement of costs we know to be unallowable.

SELF-REPORTING AND DISCLOSURE OBLIGATIONS
We are required to disclose to the government whenever we have credible evidence of a violation of federal criminal law. Examples of violations include fraud, conflicts of interest, bribery, or gratuity violations. We must also report violations of the False Claims Act or if we receive a significant overpayment on a federal contract.

Everyone must comply with applicable Medicare fraud, waste, and abuse requirements. We must report any suspected fraud, waste, or abuse of Medicare Trust funds or other Medicare program resources, including funds used to pay contractor administrative costs to the Compliance Officer. This includes suspected wrongdoing committed by a Noridian associate or a third party, such as a Medicare provider, supplier, or beneficiary.

Under our Medicare contracts, we are required to make timely reports to CMS whenever a known, probable, or suspected Reportable Event is discovered. A Reportable Event is anything that involves the following:

1. A matter that a reasonable person would consider a violation of criminal, civil, or administrative laws applicable to any Medicare contract or federal health care program or;

2. Integrity violations, including any known, probable, or suspected violation of any Medicare contract term or provision.

Reportable Events may include activity that occurs at Noridian or any of its subcontractors, consultants, vendors, or agents.

PROTECTION OF GOVERNMENT PROPERTY
Noridian may be provided with government property as part of its contracts. Normally, Noridian and the federal government will agree upon a property control system that everyone must strictly follow. In addition, the government has rights to access any records created by Noridian to keep track of government property. Noridian is responsible for damage to government property in its possession.

COMPLIANCE WITH ANTITRUST LAWS
Federal antitrust laws are designed to promote fair competition and create a level playing field in the marketplace. Anticompetitive activities are against the law. They include:

- Agreements to decide what to charge for a product
- Agreements among competitors to refuse to deal with particular suppliers or vendors (boycotts)
- Agreements to limit the production or quality of goods or services
- Bid rigging or other collusive action in pricing a bid
- Agreements to allocate the market for our goods and services among ourselves and our competitors
- Agreements to give preferential pricing or terms to a customer
- Agreements to restrict marketing efforts (e.g. territory, customers)
- Agreements that require the purchase of one product as a condition of selling another

Additionally, we must not solicit or obtain confidential information about a competitor in a manner that would be illegal or would require a person to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

Because antitrust laws are complex and vigorously enforced, we must take special care in this area. Violations may result in severe penalties, including substantial fines and criminal penalties, for you.
Did you know?

Do not get drawn into discussions with competitors of Noridian on inappropriate topics, such as pricing. If you find yourself in such a situation, immediately end the conversation and, if appropriate, ask that your refusal to participate be documented in meeting minutes. Immediately report any such incident to the Compliance and Ethics or Legal Department.

and/or Noridian. Consult the Legal Department for questions about the interpretation of antitrust laws.

GOVERNMENT INVESTIGATIONS

We are all expected to cooperate with any government investigation. Such cooperation requires accuracy, candor, and responsiveness, whether information requests come from the government or from a member of an investigative or enforcement entity.

If you are contacted in relation to an investigation, you should immediately contact the Legal Department to ensure our informational rights and privileges are upheld.

EMPLOYMENT OF FORMER AND CURRENT GOVERNMENT PERSONNEL

We will comply with all laws concerning the recruitment and employment of former and current government associates, either as associates or consultants. Contact Human Resources or the Legal Department for further guidance.

To report a violation of the Code, call 888-264-2227.
Section 7
SAFE AND RESPECTFUL WORKPLACE

We are committed to maintaining a safe and professional working environment and assuring everyone is treated with fairness, dignity and respect. These principles apply whether we are dealing with our customers, providers, vendors, business partners, or our fellow colleagues.

As part of this commitment, we are responsible to follow government regulations and rules that protect us in the workplace, including the provision of:

- A drug-free work environment
- An environment free of discrimination and harassment
- Equal employment opportunities
- An environment free from acts or threats of violence
- An environment accessible to all workers regardless of disability

Consult the Employee Handbook for additional information about these commitments.

The Facilities Department helps us maintain a safe work environment by eliminating any foreseeable hazards to the health and safety of everyone that may result in:

- Personal injury or illness
- Property damage or loss
- Business interruptions caused by accidents, fires or other hazards

Consult the Safety Manual for additional information about these areas.

Did you know?

While clearly improper activities such as harassment and discrimination will not be tolerated, we should also remember that seemingly innocent behavior such as spreading gossip and rumors can also cause problems in the workplace and should be avoided.
NOTICE TO EMPLOYEES CONCERNING WHISTLEBLOWER RIGHTS AND REMEDIES UNDER 41 U.S.C.§ 4712

Noridian Healthcare Solutions is committed to operating with integrity and in compliance with all applicable laws and regulations concerning whistleblower protection. Noridian maintains a strict No Retaliation Policy. Any employee who, honestly and in good faith, reports a potential violation or cooperates with an investigation is protected from retaliation. This Notice of Whistleblower Rights and Remedies provides employees with a summary of rights and remedies as set forth in 41 U.S.C. § 4712.

BACKGROUND

Federal protections for whistleblowers are established at 41 U.S.C. § 4712 and Federal Acquisition Regulation 3.908. Noridian is required to provide information about the protections. Provisions of the law are summarized below.

POLICY

Statute 41 U.S.C. § 4712 states that an “employee of a contractor, subcontractor, grantee, or subgrantee or personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for ‘whistleblowing’.”

Employees are protected against discharge, demotion, and discrimination as a reprisal for disclosing information (except for classified information) that the employee reasonably believes is evidence of any of the following:

- A gross mismanagement of a federal contract or grant;
- A gross waste of federal funds;
- An abuse of authority relating to a federal contract or grant (where “abuse of authority” is defined as an “arbitrary and capricious exercise of authority that is inconsistent with the mission of the executive agency... or the successful performance of a [federal] contract or grant...”);
- A substantial and specific danger to public health or safety; or
- A violation of law, rule, or regulation related to a federal contract (including competition for or negotiation of a contract) or grant.

Employees are protected when they disclose these types of information to the following persons or entities.

- A member of Congress or a representative of a committee of Congress;
- An Inspector General;
- The Government Accountability Office;
- A federal employee responsible for contract or grant oversight or management at the relevant federal agency;
- An authorized official of the Department of Justice or other law enforcement agency;
- A court or grand jury; or
- A management official or other employee of the contractor, subcontractor, or grantee who has the responsibility to investigate, discover, or address misconduct. (Information on how to report an issue at Noridian is listed on the last page).

In addition, an employee who initiates or provides evidence of contractor, subcontractor, or grantee misconduct in any judicial or administrative proceeding relating to fraud, waste, or abuse on a federal contract or grant shall be deemed to have made a disclosure.

REPORTING TO FEDERAL AGENCY

Whistleblowers who believe they were discriminated against for their disclosure of information may submit complaints to the Inspector General of the Federal agency involved. Whistleblowers will have up to three years after the date of the alleged discrimination to submit a complaint.

The Inspector General will generally perform an investigation and submit a report to the federal agency, which then determines whether sufficient basis exists to conclude that discrimination occurred.
If the agency determines that discrimination has occurred, the law sets out remedies that may be available, including ordering an institution to reverse the reprisal, reinstate the employee with compensatory damages and employment benefits, and/or pay costs reasonably incurred by the whistleblower in bringing the complaint. Noridian has the right to appeal any agency order to the relevant United States court.

REPORTING TO NORIDIAN
Under Noridian’s Code of Conduct, everyone has a responsibility to report any issue or concern they believe, in good faith, may constitute noncompliance with laws, regulations, contractual requirements, and/or violate the Code of Conduct or other Noridian policies. The Code also outlines the different reporting mechanisms we may use to report the types of activities covered by the Program.

To report a violation of the Code, call 888-264-2227.
REPORTING OPTIONS

We are colleagues, working together toward a common goal: to deliver products and services in accordance with applicable laws and regulations, contractual obligations, and the highest ethical standards. If we become aware of a potential compliance concern, we have an obligation to report it so that it may be addressed.

**OPTION 1**
Discuss with your Immediate Supervisor
Discuss the concern with an immediate supervisor and give them a chance to solve the problem. If your concern remains after the discussion or if you are not comfortable discussing the concern with a supervisor, speak with someone else.

**OPTION 2**
Discuss with Department Management
Discuss the concern with a higher level of department management. If your concern remains after the discussion or if you are not comfortable discussing the concern with a higher level of department management, speak with someone else.

**OPTION 3**
Discuss with Ethics and Compliance
Discuss the concern with Kara Kirkeby, the Compliance Officer:
- By telephone at (701) 282-1498
- By e-mail at Kara.Kirkeby@noridian.com
- In person
- Or contact another member of the Compliance and Ethics Department

If you are not comfortable to talking to Compliance and Ethics personnel, go to the next step.

**OPTION 4**
Contact the Compliance Hotline
Call (701) 281-8601 or toll-free at (888) 264-2227 (the hotline is available 24 hours a day), or use one of the following mechanisms:
- Openboard e-reports: www.openboard.info/nmic
- Interoffice mail router addressed to Compliance
- Drop-box (Fargo only)
- Noridian Compliance & Ethics’ Post Office Box:
  Compliance
  R.O. Box 242
  West Fargo, ND 58078-0242