

noridian

Healthcare Solutions

Delivering solutions that put people first.



VENDOR CODE

Revised February 2024





MESSAGE FROM THE PRESIDENT

Dear Valued Vendor:

We at Noridian Healthcare Solutions (Noridian) are committed to doing business ethically and with integrity. We expect the same commitment from all individuals, companies, and others who work with us. The Noridian Vendor Code of Conduct (Vendor Code) is designed to help guide you in meeting that commitment.

If you are a subcontractor supporting one of our government contracts, you are expected to comply with the Noridian Code of Conduct for Noridian employees (Associate Code). Although the Vendor Code and Associate Code share similarities, associates and subcontractors have additional obligations that are not addressed in this Vendor Code.

The Vendor Code is there to help guide you, but it can't address every situation you may come across. If you have any questions, please contact your Noridian business contact or the Compliance and Ethics Department at 1-833-221-5155.

Our Vendors play an important role in our organization's success. Thank you for your commitment to making compliance and ethics a top priority.

Sincerely,

A handwritten signature in dark ink that reads "Jon Bogenreif". The signature is fluid and cursive.

Jon Bogenreif
President & Chief Executive Officer

TABLE OF CONTENTS

NORIDIAN VALUES	3
SPEAKING UP	4
No Retaliation	4
CONFLICTS OF INTEREST & BUSINESS COURTESIES	4
PROTECTING ASSETS AND INFORMATION	5
Fraud, Waste, and Abuse	5
Records Management	5
Audits	5
OTHER GOVERNMENT CONTRACT OBLIGATIONS.....	6
Excluded or Ineligible Persons.....	6
Organizational Conflicts of Interest.....	6
Publicity.....	6

NORIDIAN VALUES

Noridian designs and delivers solutions that support the administration of government and commercial 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.

The Vendor Code applies to most third parties that work for Noridian, including vendors and suppliers, along with their employees, agents, contractors, consultants, and temporary employees (collectively "vendors"). It explains the general principles that we expect from those who do business with us. This includes complying with laws and regulations that apply to their business and to the agreements they have with us.

SPEAKING UP

As our vendor, you have a responsibility to report good faith concerns that you have about any violations of this Code or law or regulation that apply to your work for Noridian. This includes whether the noncompliance involves Vendor or Noridian personnel.

You may report directly to the Noridian Compliance Officer or any member of the Compliance Department.

- Write to Compliance, PO Box 242, West Fargo, ND 58078*
- Report on EthicsPoint using the QR code
- EthicsPoint website noridiansolutions.ethicspoint.com
- Call the EthicsPoint Compliance Hotline* at 1-833-221-5155



No Retaliation

Noridian maintains a No Retaliation Policy and expects its vendors to do the same. Any employee who, honestly and in good faith, reports a potential violation of law, authority, or contract or who cooperates with an investigation is protected from retaliation under federal law.

Whistleblower rights and remedies are set forth in 41 U S C § 4712, which states that an “employee of a [federal] contractor, subcontractor, grantee, or subgrantee or personal services contractor may not be discharged, demoted, or otherwise discriminated against as a reprisal for ‘whistleblowing.’”

CONFLICTS OF INTEREST & BUSINESS COURTESIES

Vendors must avoid *actual* conflicts of interest as well as the *appearance* of conflicts of interest. Some examples include interacting on Noridian business with a Noridian employee who:

- has a financial interest in the Vendor.
- is a family member of a Vendor representative.

Vendors must disclose to Noridian material transactions or personal relationships that could give rise to a conflict of interest. Conflicts of interest are common but can be managed when they are appropriately disclosed. If you have questions, contact your Noridian business contact or Noridian Compliance.

Business courtesies offered to or received from Vendors can create the appearance of influence, even if that is not the intent. Noridian Vendors are asked to cooperate with Noridian’s business courtesy policy. Nominal business courtesies are acceptable if they are infrequent and not viewed as a threat to our objectivity. Vendors should refrain from giving cash or cash equivalents or gifts valued above \$50. In addition, Noridian employees may not accept more than \$150 annually from a single vendor.

Kickbacks and bribes are never allowed.

PROTECTING ASSETS AND INFORMATION

Noridian is responsible for protecting the confidential information entrusted to us. Some of the laws that apply to Noridian's business include the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health (HITECH) Act, and the Privacy Act. Some examples of confidential information include Protected Health Information (PHI), Personally Identifiable Information (PII), and other proprietary information of Noridian's employees, vendors, and customers.

Vendors whose work includes the use and disclosure of PHI are required to have a Business Associate Agreement with us. A Non-Disclosure Agreement is required from vendors who access Noridian proprietary or confidential information. Vendors must continue to protect confidential information even after they no longer have a relationship with Noridian.

Fraud, Waste, and Abuse

Noridian is committed to identifying, preventing, correcting, and reporting fraud, waste, and abuse. If you suspect FWA practices, you must report them to Noridian.

Records Management

Vendors must maintain accurate and complete records of their business with us for the period required by laws, regulations, policies, and their business agreements with us. Records are defined generally as information created, received, transmitted, and/or maintained in the transaction of business and in the performance of legal and/or contractual obligations.

If a litigation matter, government investigation, or audit involving Noridian has begun or is anticipated, relevant records must not be destroyed until the matter or proceeding has been concluded. If Noridian is aware of any lawsuit, audit, or investigation, Noridian's Legal Department or the Vendor's Noridian business contact will advise the vendor of any requirements that apply.

Audits

Federal and state government entities may have the right to access and examine a vendor's books, papers, and other records when the information relates to the vendor's business agreement with us. Vendors must cooperate fully with any related audit or investigation.

Vendors must notify Noridian of any government audit or investigation related to the Vendor's business with Noridian. The vendor is required to allow a Noridian representative to be present onsite during the audit or investigation.

Noridian may audit or may require the vendor to audit the vendor's records to ensure the vendor conforms to their business agreement with us.

OTHER GOVERNMENT CONTRACT OBLIGATIONS

Excluded or Ineligible Persons

Noridian will not conduct its government contract work with any person or entity that is suspended or debarred (proposed for debarment) from government contracting or is excluded by the government from participating in a government health care program, such as Medicare or Medicaid.

Organizational Conflicts of Interest

Organizational conflicts of interest can occur if:

- 1) the vendor is unable (or potentially unable) to provide impartial assistance or advice.
- 2) The vendor's objectivity might be impaired.
- 3) the vendor has an unfair competitive advantage that could benefit Noridian.

Vendors must disclose to us actual or potential organizational conflicts of interest so they can be addressed properly.

Publicity

Vendors are not allowed to distribute advertising, press releases, or any other general public announcement regarding the items or services they provide to Noridian unless they have obtained our prior written permission.

noridian

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