

AgeRight Advantage (ARA) Standards of Conduct

April 6, 2026

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Dear Valued Team Member and Collaborating partners-

Age Right Health Plan Team members are committed to the care of their clients. We consider it an honor to provide a service to our older adult population. Thank you for choosing us to be your health plan, employer or collaborating partner. We appreciate you taking the time to review our standards of conduct.

Our standard of conduct reflects how serious we are about the way we approach compliance and ethics. Our expectation is that these standards are followed by the team members and any of our collaborating partners.

At Age Right we believe in doing the right thing for the client and staff. Compliance and ethics are important to us and is not an option.

The standard of conduct is not just a piece of paper. We believe it is the way to conduct business. If you believe there has been a violation of the standards of conduct, please notify your supervisor. If you don't feel comfortable with informing your supervisor, please notify your compliance director. You also have a 1-844-317-9059 phone number to call. Please know that retaliation is not tolerated on any good faith report of a concern.

Also, if you ever would like to request any Compliance Policy or Procedure, please email us at: Compliance@agerightadvantage.com.

Thank you for your time and for being a part of our team and/or collaborating partner. We hope that if you have any questions, don't hesitate to ask. Our success is based on all our dedication to a quality program that follows the regulations and ethics.

Sincerely,

Jonalyn Brown

CEO

AgeRight Health Plans

Patty Kleckner

Chief Compliance Officer

AgeRight Health Plan

Our mission

The AgeRight Advantage mission is to promote the vitality within each of AgeRight Advantage's members and to support them along their aging journey.

Our Responsibility

AgeRight Advantage maintains certain policy and reference documents to guide its employees with respect to their day-to-day conduct and performance. For purposes of these Standards, "employees" include all permanent, temporary, full-time, part-time, and volunteer employees who 1) have primary job duties related to ARA Part C and Part D operations and/or sales; and/or 2) are members of the ARA Board of Directors.

This document represents ARA Standards of Conduct (hereafter referred to as "Standards"). These Standards describe the overarching principles and values of the organization. Compliance with these Standards is the responsibility of all ARA employees, as well as first tier and downstream entities performing services on behalf of the plan. This document outlines expectations of employees conduct in areas where improper activities could damage ARA reputation and otherwise result in serious adverse consequences for ARA and to the employees involved.

ARA expects all employees to conduct themselves in an ethical manner, and to report all instances of noncompliance and potential fraud, waste, and abuse (FWA) through appropriate mechanisms. These Standards identify how issues can be reported and that such reporting can be done anonymously and confidentially, and without fear of retaliation. Reported issues will be addressed and corrected in a timely manner. In addition, compliance and ethics are valued at the highest levels of authority within the organization.

As ARA continues to grow, and as federal and state laws change, the need may arise and ARA reserves the right to revise, supplement, or rescind any policies or portion of these Standards as it deems appropriate, in its sole and absolute discretion. Employees will be notified of changes to these Standards as they occur.

As a condition of employment, all new employees will receive these Standards along with the required compliance training within the first 90 days of hire and they will comply with all the elements in their day-to-day activities. Existing ARA employees will receive these Standards at least annually or upon revisions.

An employee's actions under these Standards are significant indications of the individual's judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the employee for position assignments and promotion. Correspondingly, insensitivity to or disregard of these Standards' principles will be grounds for appropriate management disciplinary action per the *Disciplinary Standards* policy.

Business Ethics and Conduct

The successful business operation and reputation of AgeRight Advantage is built upon the principles of fair dealing and ethical conduct of our employees. The Plan's reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. AgeRight Advantage's success is dependent upon our customers' trust, and we are dedicated to preserving that trust. Employees are expected to conduct themselves in a way that will merit the continued trust and confidence of our customers. AgeRight Advantage will comply with all applicable laws and regulations. As such, employees are expected to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide each employee with respect to lines of acceptable conduct. If a situation arises in which it is difficult to determine the proper course of action, the matter should be discussed openly with the employee's immediate supervisor and, if necessary, with the AgeRight Advantage Compliance Officer. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

Patient Protection and Affordable Care Act

The Patient Protection and Affordable Care Act (ACA), signed into law in 2010, significantly reformed the U.S. healthcare system. The ACA aims to expand access to healthcare coverage, reduce costs, and improve healthcare system performance.

Key provisions relevant to AgeRight Advantage include

- Compliance and Transparency-The ACA introduced enhanced compliance requirements for healthcare providers and plans, including mandatory reporting of overpayments and increased scrutiny of billing practices.
- Fraud, Waste, and Abuse (FWA)-The ACA strengthened enforcement against FWA by expanding the government's ability to audit, investigate, and penalize improper conduct.
- Program Integrity- The Act mandates more rigorous screening and oversight of providers and suppliers participating in federal health programs to ensure program integrity.

AgeRight Advantage adheres to ACA provisions to maintain compliance and promote high standards in care delivery. All employees and affiliated entities must be aware of and operate in accordance with these ACA requirements.

Conflict of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Conflict of interest is defined as a situation in which a person has a financial

interest, personal activity, or relationship that could impair the person's ability to act impartially and in the best interest of the Plan when performing his or her duties. These Standards establish the framework and general direction within which AgeRight Advantage wishes the business to operate. Where necessary, employees should seek further clarification on issues related to the subject of acceptable standards of operation. Contact the AgeRight Advantage Compliance Officer at compliance@agerightadvantage.com for more information or for any questions concerning conflicts of interest.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of AgeRight Advantage. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gains refer to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, or both. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in personal gain for that employee or for a relative as a result of AgeRight Advantage's business dealings. For the purposes of these Standards, a relative is any person who is related by blood or marriage, or whose relationship with the employee is like that of people who are related by blood or marriage.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative they disclose any such relationships to AgeRight Advantage management as soon as possible so that safeguards can be established to protect all parties. Personal gain may result not only in cases where an employee or relative has significant ownership in a firm with which AgeRight Advantage does business, but also when an employee or relative receives any reward, bribe, substantial gift, or special consideration because of any transaction or business dealings involving AgeRight Advantage.

Prohibition of Improper Payments

AgeRight Advantage expects all employees to use only legitimate practices in commercial operations and in promoting AgeRight Advantage's position on issues before governmental authorities. As stated below, "kickbacks" or "bribes" intended to induce or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

According to the Anti-kickback Statute 42 U.S.C. § 1320a-7b(b), no employee of AgeRight Advantage or any Network or Representative acting on AgeRight Advantage's behalf shall, in violation of any applicable law, offer or make directly or indirectly through any other person or firm any payment of anything of value (in the form of compensation, gift, contribution, or otherwise) to:

- Any person or firm employed by or acting for or on behalf of any customer, whether private or governmental, for the purpose of inducing or rewarding any favorable action by the customer in any commercial transaction; or any governmental entity, for the purpose of inducing or rewarding action (or withholding of action) by a governmental entity in any governmental matter.
 - Any governmental official, political party or official of such party, or any candidate for political office, for the purpose of inducing or rewarding favorable action (or withholding of action) or the
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exercise of influence by such official, party or candidate in any commercial transaction or in any governmental matter.

In utilizing consultants, agents, sales representatives or others, AgeRight Advantage will employ only reputable, qualified individuals or firms under compensation arrangements, which are reasonable in relation to the services performed. Consultants, agents, or representatives retained in relation to the provision of goods or services to the federal government must agree to comply with all laws, regulations, and AgeRight Advantage policies governing employee conduct.

The provisions of this section are not intended to apply to ordinary and reasonable business entertainment or gifts not of substantial value, customary in local business relationships and not contrary to the law as applied in that environment. Managers are expected to exercise sound discretion and control in authorizing such business entertainment and gifts.

When customer organizations, governmental agencies, or others have published policies intended to provide guidance with respect to the acceptance of entertainment, gifts, or other business courtesies by their employees, such policies shall be respected.

Political Contributions

AgeRight Advantage will not make any contribution to any political party or to any candidate for political office in support of such candidacy except as provided in these Standards and as permitted by law.

In the United States, federal law strictly controls corporate involvement in the federal political process. Generally, federal law provides that no corporation may contribute anything of value to any political party or candidate in connection with any federal election.

While similar laws apply in some states and their political subdivisions, in many jurisdictions in the United States, corporate contributions to candidates and political parties in connection with state and local election campaigns are lawful.

These Standards are not intended to prevent the communication of AgeRight Advantage views to legislators, governmental agencies, or to the public with respect to existing or proposed legislation or governmental policies or practices affecting business operations. Moreover, under these Standards, reasonable costs incurred by AgeRight Advantage to establish or administer political action committees or activities organized to solicit voluntary political contributions from individual employees are not regarded as contributions to political parties or candidates, where AgeRight Advantage may lawfully incur such costs.

Reporting Potential or Detected Noncompliance or Fraud, Waste, and Abuse

Under the Federal False Claims Act makes it illegal to submit a false claim to the government for reimbursement. Example of (but not limited to) false claims are submitting a claim that falsifies information that the health plan receives a higher payment (upcoding) than what was provided. Or submitting a claim that services were not rendered.

In addition to the False Claims Act, federal criminal statutes further prohibit fraudulent activity:

- **18 U.S.C. § 287:** Prohibits knowingly making or presenting false, fictitious, or fraudulent claims to the United States government. Convictions can result in imprisonment, fines, or both.
- **18 U.S.C. § 1001:** Prohibits making false statements, concealing material facts, or using fraudulent documentation in any matter under the jurisdiction of the federal government—including healthcare claims submitted to Medicare or Medicaid.

These laws work alongside **Title XVIII of the Social Security Act**, which governs the Medicare program. Under this Title, it is illegal to knowingly submit false information to obtain Medicare payments or to engage in fraudulent billing practices. Violations may lead to civil penalties, criminal prosecution, and exclusion from federal health programs.

All AgeRight Advantage employees and partners must ensure all claims and documentation submitted in connection with Medicare (or other federal programs) are accurate and truthful. Failure to comply can result in disciplinary action and legal consequences.

Another form of fraud involves violations of the **Stark Law**, which prohibits physicians from referring Medicare or Medicaid patients for certain designated health services to an entity with which the physician or their immediate family member has a financial relationship, unless a specific legal exception applies.

ARA is committed to complying with all applicable laws, including but not limited to those addressing noncompliance and FWA. Employees are expected to immediately report any potential false, inaccurate, or questionable issues to their supervisors or the ARA Compliance Officer in accordance with ARA policies. Any employee who is requested to engage in any activity which is or may be contrary to the intent and spirit of these Standards must promptly report such information to his or her manager, or, if the employee was directed by the manager, then to the ARA Compliance Officer. Likewise, any employee who acquires information that gives the employee reason to believe that any other employee is engaged in conduct forbidden by these standards must promptly report such information to his or her manager or, if the manager is engaged in such conduct, then to the ARA Compliance Officer.

ARA employees can use the following information to submit questions or reports of suspected or detected noncompliance or potential FWA.

Methods for Reporting Potential and Detected Noncompliance and Fraud, Waste, and Abuse (FWA)	
Anonymous Hotline	1-844-317-9059
Confidential E-mail	compliance@agerightadvantage.com
Mailing Address	Compliance Officer AgeRight Advantage 4560 SE International Way #100 Milwaukie, OR 97222

ARA does not tolerate fraudulent or other dishonest behavior and will take appropriate investigative and corrective action upon receiving such reports. ARA is prohibited by law from retaliating in any way against any employee or contractor who in good faith reports a perceived problem, concern, or issue involving noncompliance or FWA, and will not take punitive action against an employee who reports such information.

ARA FWA program will investigate any allegations as it relates to our members, vendors, pharmacies, team members and FDR.



Let's answer your questions about FWA

Common Q &A scenarios you might ask as a team member:

Q: A team member instructed me to document that the member was seen on a particular date, and I know that the provider did not see them on that date because they were on vacation. What do I do?

A: This could be a violation and should be investigated. Do not document that date for a claim. Report this information to your immediate supervisor or contact the compliance officer regarding your concern regarding the request at the hotline or email address. Great job in questioning this situation and thank you for paying attention to the details.

Q: I have noticed that the provider is ordering a lot of x-rays for unrelated diagnosis what should I do?

A: This could be considered FWA and should be investigated. You would want to notify compliance hotline or compliance email to investigate. Also, good job on your awareness of suspicious activity. Way to go!!

Marketing Materials and Prohibited Beneficiary Inducements

All forms and marketing materials produced by ARA must be approved prior to giving them to any client or potential client. The marketing materials are also highly regulated so please see your supervisor for proper approval of any type of marketing or description materials.

In addition to marketing materials, the Beneficiary Inducement Statute makes it **illegal to offer or transfer anything of value to a Medicare or Medicaid beneficiary** if the offer is **likely to influence the individual's selection of a particular provider, practitioner, or supplier**.

In plain terms, healthcare providers or suppliers **cannot give gifts, cash, or other benefits to entice patients** to use their services, if those services are paid for by federal programs.

Member Privacy

AgeRight Advantage (ARA) is committed to protecting our members' privacy in accordance with Health Insurance Portability and Accountability Act (HIPAA). PHI is protected under HIPAA, Health Information Technology for Economic and Clinical Health Act (HITECH), CMS requirements, and state confidentiality laws. Team members may access PHI electronically, on paper, or through direct member interactions as part of their job. All access requires safeguarding PHI's confidentiality, integrity, availability, and security.

Protecting Member Privacy

- PHI includes **name, DOB, SSN, address, Medicaid/Medicare ID, financial info, diagnoses, medications**, and any other information that identifies a member.
- Access PHI **only as needed** for your job.

Workforce Responsibilities

- Keep PHI **confidential, secure, and accurate** in all formats (electronic, paper, verbal).
- **Do not share passwords** or system access.
- PHI access system is **monitored and audited**.
- Follow the **Minimum Necessary Standard**: only access what is required for your work.
- **Do not remove, copy, or keep PHI** when leaving ARA
- **Do not use text messaging** to send PHI.

Examples of Breaches

- Accessing PHI outside your job duties.
- Sharing PHI with unauthorized individuals.
- Sending PHI to the wrong email, fax, or recipient.
- Discussing PHI in public areas.
- Losing devices or documents containing PHI.

Reporting Violations

- Report suspected HIPAA violations or breaches immediately, not longer than 24 hours of discovery, to your **supervisor** and **ARA Privacy/Compliance Officer** via direct call, email or hotline.
- **Do not investigate or confront others**.
- **No retaliation** against anyone reporting in good faith.

Breach Response

- ARA will investigate and notify members and regulatory agencies as required.
- Failure to comply with breach notification rules may result in penalties for ARA.

Training & Attestation

- Complete **HIPAA Privacy & Security training** and the attestation, within 90 days of hire or role assignment.
- Repeat training and the attestation **annually**.



Let's answer your questions about Privacy

Common Q &A scenarios you might ask as a team member:

Q: You receive a file with a member's name, date of birth, and diagnosis while working on a project. What type of information is this, and how should you treat it?

Answer: This is Protected Health Information (PHI). It must be kept confidential, secure, and only accessed for work-related purposes.

Q: While helping a coworker, you notice a member's PHI that isn't related to your tasks. Can you review it?

Answer: No. You should only access PHI that is necessary to perform your own job duties, following the Minimum Necessary Standard.

Q: You accidentally send a member's medical information to the wrong email address. What kind of situation is this, and why is it a concern? And what should you do?

Answer: This is a HIPAA breach because PHI was shared with an unauthorized recipient, which violates privacy rules. You should notify the Privacy/Compliance Officer within 24 hours of discovery.

Q: You overhear a colleague discussing a member's PHI in a public area. What should you do?

Answer: Report the suspected HIPAA violation immediately to your supervisor and the Privacy/Compliance Officer. Do not investigate it yourself.

Regulated By

ARA is heavily regulated by multiple entities like Centers for Medicare and Medicaid Services (CMS) and local state agencies. The regulations ensure that ARA meets our contractual and regulatory requirements. You may be contacted by an agency asking for information, please contact your supervisor to make sure the agency is allowed this information and access. Responses should be directed by leadership, compliance or legal.

AgeRight Advantage operates under the regulations set forth in Title 42 of the Code of Federal Regulations (CFR), specifically Parts 422 and 423. These regulations govern Medicare Advantage (Part C) and Medicare Prescription Drug Plans (Part D).

-42 CFR Part 422-Outlines the requirements for Medicare Advantage organizations, including beneficiary protections, provider contracting, marketing practices, reporting obligations, and quality improvement programs.

-42 CFR Part 423- Establishes the standards for Medicare Part D, which provides prescription drug coverage. It includes rules for formulary management, pharmacy network adequacy, and drug utilization reviews, as well as safeguards against fraud, waste, and abuse.

All employees, first-tier entities, and downstream contractors are expected to understand and adhere to these regulatory requirements. Compliance with these provisions ensures the integrity and quality of the Medicare services we provide and protects both our members and the Medicare Trust Fund.

The Fraud enforcement and recovery act of 2009 increase the penalty of fraudulent claim to a felony. These are the types of things that the regulators monitor when they audit our plan. We want to maintain open communication with the regulators. ARA does not want to misrepresent information given to these agencies. If you discover that you may have given the regulators wrong information, please contact your supervisor or compliance department to correct the information given.

Eligibility to participate in Federal and State programs

ARA conducts audits through multiple data base information to ensure that all providers, team members and FDR are eligible for participation with a federal and state program. These audits include verifying if any individual or entity is not eligible to participate or bill for services due to them being excluded, suspended, or opted out of participation. The database that we pull from includes but is not limited to: OIG (Office of Inspector General).

If ARA discovers that any prospective or current employee, FDR or Board member is identified as on this list ARA will promptly remove the individual or entity from our program. Payments may not be made to or for any entity excluded as well.

As a member of our team, if you are made aware that you are on an exclusion list participating in a federal or state program, you are required to notify your immediate supervisor or compliance department as soon as possible.

Impact on ARA if Not in Compliance

Under **42 U.S.C. § 1395w-27(g)**, the **Centers for Medicare & Medicaid Services (CMS)** has the authority to impose **Civil Monetary Penalties (CMPs)** on Medicare Advantage (Part C) plans that fail to meet federal compliance obligations.

Penalties may be assessed for a range of violations, including but not limited to-Failure to deliver required medical services. Providing false or misleading information to CMS.

-Engaging in improper marketing practices or beneficiary discrimination.

-Not following mandated procedures for enrollment, appeals, or grievances.

CMPs can reach **\$25,000 per violation**, and even more for repeated infractions or those that negatively impact beneficiaries. These penalties are a serious compliance enforcement tool used to uphold the integrity and quality of Medicare services.

To protect AgeRight Advantage from regulatory sanctions and reputational harm, **all employees, contractors, and associated entities must consistently follow CMS compliance requirements**. Doing so supports our mission and preserves the trust of our members and oversight agencies.

Required Training and Education Activities

These Standards describe ARA expectations that all employees conduct themselves in an ethical manner. To assist employees with understanding potential issues and to comply with Centers for Medicare and Medicaid Services (CMS) requirements, certain training and education activities are required. This training includes code of conduct, fraud, waste, and abuse, elements of an effective compliance program and HIPAA compliance. The compliance training is mandatory for the first 90 days and annually thereafter for the following groups:

- All ARA board members and employees hired or appointed
- ARA requires that all First Tier Entities and downstream entities employees will be trained as well within their first 90 days and annually thereafter.

Violations of the Standards of Conduct

Violations of these Standards are grounds for discharge or other disciplinary action, adapted to the circumstances of the violation and having as a primary objective furtherance of ARA interest in preventing violations and making clear that violations are neither tolerated nor condoned.

The False Claims Statutes under Title 18 of the United States Code are critical tools used by the federal government to combat fraud and protect public funds, especially in programs like Medicare and Medicaid.

- 18 U.S.C. § 287: This statute makes it a criminal offense to knowingly present a false, fictitious, or fraudulent claim for payment to the federal government. Violations can lead to significant fines and imprisonment.

- 18 U.S.C. § 1001: This statute prohibits knowingly and willfully falsifying, concealing, or covering up material facts or making materially false statements in any matter within the jurisdiction of the federal government. This includes documents, claims, or data submitted in connection with federal healthcare programs.

These statutes serve as a foundation for ensuring the integrity of the Medicare and Medicaid programs.

Employees and contractors must ensure that all claims and documentation are accurate and truthful. Violations can result in criminal penalties, civil fines, and exclusion from federal programs.

Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of these Standards, but also against:

- Any employee who may have deliberately failed to report a violation of these Standards.
- Any employee who may have deliberately withheld relevant and material information concerning a violation of these Standards; and
- The violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate leadership and lack of diligence per the *Disciplinary Standards* policy



Let's answer your questions about FWA

Common Q &A scenarios you might ask as a team member:

Q: *My friend's mom is part of our AgeRight Advantage, and she wanted to know which medication she was on for her diabetes.*

A: As a team member you are not at liberty to disclose this information to your friend. This would be a direct violation of the HIPAA act.

Q: *My colleague's cousin is on AgeRight Advantage, and they want me to look up their address so that they can send them a card. My colleague does not have access to this information, and I do. Can I give it to them?*

A: No, you may not give your colleague any type of demographic information. This is a violation of the member's privacy therefore a HIPAA violation.

AgeRight Advantage Compliance Officer Contact Information

Chief Compliance Officer	Patty Kleckner
Phone	503-701-0202
E-mail	patty.kleckner@agerightadvantage.com

Mailing Address	Compliance Officer AgeRight Advantage, Inc. 4560 SE International Way #100 Milwaukie, OR 97222
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Compliance Hotline and Compliance Contact Information

Phone	1-844-317-9059
Fax	1-800-335-0270
E-mail	compliance@agerightadvantage.com
For access to Compliance Policies and Procedures	patty.kleckner@agerightadvantage.com