



# CODE OF CONDUCT

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# LETTER FROM THE CEO & CHIEF COMPLIANCE OFFICER



Since 1977, a group of bold, determined seniors came together with a vision: to build something that didn't yet exist — a health plan designed by seniors, for seniors. That act of courage — to speak up, build differently, and refuse to accept the status quo, is SCAN's origin story. It's also our cultural DNA.

Those founding seniors were, in every sense of the word, rebels. They challenged a system that too often overlooked older adults. They demanded something better and then built it themselves.

Being a rebel at SCAN doesn't mean breaking rules, it means challenging what's easy in pursuit of what's right. It means thinking differently, acting boldly, and putting our mission ahead of personal comfort or conventional thinking. In choosing to be rebels in our industry, we also choose to lead differently.

As we grow into new markets and take on more complex challenges, we know that the how matters just as much as the what.

At SCAN, we identified five core behaviors, our Ways of Working, that define how we deliver on our mission. These aren't just culture words. They are expectations:

# LETTER FROM THE CEO & CHIEF COMPLIANCE OFFICER

- **Member Obsession:** We put members first, always.
- **Champion's Mindset:** We welcome the challenge and persevere until we win.
- **Courageous Challenge:** We choose candor over comfort.
- **Relentless Leadership:** We act like owners, even when it's hard.
- **Breakthrough Achievement:** We deliver bold goals that transform lives.

These behaviors are the foundation of how we operate, not just culturally, but ethically. They guide how we make decisions, how we treat one another, how we take ownership, and how we hold ourselves to the highest standard of integrity.

This Code is here to protect that standard. It's not just about compliance—it's about character, trust, and doing right by the people we serve.

At SCAN, **Member Obsession** means every one of us feels a deep sense of ownership for the seniors we serve and their experience. We don't just serve members—we advocate for them, anticipate their needs, and run down every barrier that gets in their way. Their problems are our problems. Their satisfaction is our standard.

**Champion's Mindset** reminds us that this work is hard—and worth it. We meet challenges with grit, focus, and resilience, knowing that perseverance is how meaningful progress happens.



# LETTER FROM THE CEO & CHIEF COMPLIANCE OFFICER

**Courageous Challenge** asks us to speak up, listen well, and create space for honest dialogue. Especially in health care, progress depends on truth-telling and humility.

**Relentless Leadership** means we don't wait to be told what's broken—we take initiative, own the outcomes, and push for better, even when it's inconvenient.

And **Breakthrough Achievement** sets the bar higher. We don't just want to do our jobs well—we want to create solutions that transform lives and move our mission forward in bold, measurable ways.

The code of conduct document reflects what it truly means to be a SCAN employee, someone who leads with purpose, challenges with care, and keeps our members at the center of every decision.

Thank you for your commitment to this work, and for continuing the legacy of those founding seniors. Together, we are building something that matters and doing it the SCAN way.

**SACHIN JAIN, MD**  
Chief Executive Officer



**LYN AMOR MACARAEG**  
Chief Compliance, Risk,  
& Corporate Affairs Officer



# LETTER FROM THE BOARD OF DIRECTORS



As individuals and as an organization, we at SCAN are committed to doing business in ways that are ethical, legal, and compliant. This pledge is at the heart of everything we do and is fundamental to our ability to fulfill SCAN's Mission to keep seniors healthy and independent.

This means we are committed to complying with the federal and state standards, regulations, policies, and contractual commitments that govern the programs in which we participate. By doing so we are being true to who we are and what we represent as an organization. SCAN is well-respected in the healthcare industry and communities we serve, and the strength of our reputation is maintained and enhanced when we act ethically and with integrity.

The Code of Conduct makes clear our values, principles, and standards. Upholding these commitments is a responsibility we all share as representatives of SCAN. Thank you for all that you do to support SCAN's Mission and to perform your work in accordance with the Code of Conduct and SCAN's Values.

**SCAN BOARD OF DIRECTORS**



# Our Mission

## KEEPING SENIORS HEALTHY & INDEPENDENT

Back in 1977, a group of 12 determined seniors in Long Beach, California decided they'd had enough of a system that made aging harder than it had to be. The resources were there—meals, transportation, home expenses, medical care—but they were scattered, complicated, and hard to access.

These seniors didn't just complain. They organized. Soon after, it became the Senior Care Action Network. Today, SCAN is one of the largest nonprofit Medicare Advantage programs in the nation. We're still committed to the rebellious, grassroots mission that started it all: keeping seniors healthy and independent.



# SCAN'S MISSION, CAUSE, AND BEHAVIORS PROVIDE THE FOUNDATION FOR HOW WE DO BUSINESS AND REPRESENT OUR ORGANIZATION.

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The Ways of Working are a set of five key behaviors that, if embraced by all of us, will propel us to become the best company that serves older adults.

## WAYS OF WORKING: HOW TO BE A REBEL



### MEMBER OBSESSION

We put members first, always.



### CHAMPION'S MINDSET

We welcome the challenge and persevere until we win.



### COURAGEOUS CHALLENGE

We choose candor over comfort.



### RELENTLESS LEADERSHIP

We drive progress with unwavering commitment.



### BREAKTHROUGH ACHIEVEMENT

We deliver on bold goals because our members' lives depend on it.





# WHAT IS THE SCAN CODE OF CONDUCT & WHO IS IT FOR<sup>1</sup>?

Think of our Code of Conduct as the framework for how we perform our work. It's approved by SCAN's Board of Directors and is applicable to all subsidiaries, directors, employees, subcontractors, vendors, providers and other external parties. Our Code covers SCAN's policies and standards of conduct, including those outlined in the Employee Handbook and SCAN's Compliance Program.

This Code is our written commitment to act with integrity; to understand and meet the needs of our members and partners; and to hold ourselves to the highest ethical standards. We expect each employee to do their part and report any compliance concerns. You can report without fear of retaliation as SCAN does not tolerate retaliation against anyone who has, in good faith, reported or taken part in an investigation of a possible violation of the Code, policies, regulations or laws.

While you won't find the answer for every possible situation here, allow the Code to be a guide, providing information and examples to help you determine a course of action consistent with SCAN's values, ethical business standards and legal requirements.

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<sup>1</sup> Applies to SCAN Group and its affiliates with the exception of The SCAN Foundation, which adheres to The SCAN Foundation Code of Conduct. SCAN's wholly owned Care Delivery Assets also adhere to their individual Codes of Conduct.



# WHAT'S THE DIFFERENCE BETWEEN THE CODE OF CONDUCT & THE EMPLOYEE HANDBOOK?

The **Code of Conduct** is about **how we work**—it outlines the values and behaviors that guide our decisions, shape our culture, and define what it means to work at SCAN with integrity.

The **Employee Handbook** is about **how we operate**—it gives the detailed rules, procedures, and HR policies that apply to your employment (like time off, performance, and workplace expectations).

Think of it this way:

- The **Code of Conduct** defines how we uphold SCAN's mission, values, and ethical standards.
- The **Employee Handbook** explains the day-to-day policies and procedures that help put those standards into practice.

They work together to help all of us do the right thing — for our members, our teams, and the organization.



# Speaking Up: COURAGEOUS CHALLENGE

## THE CODE: SCAN'S PRINCIPLES OF CONDUCT

There are certain standards we all must follow to ensure we're performing our jobs at SCAN with integrity and respect. This includes not just what we do, but how we do it, including how we treat others. These standards are grounded in honesty, accountability, and a deep respect for individual dignity. We are committed to maintaining a workplace that is inclusive, fair, and reflective of the diverse communities we serve.

These expectations are also reflected in our Ways of Working, the behaviors that shape how we lead, collaborate, and serve. Upholding this Code means living those values every day to create a culture where all employees, partners, and members are treated with dignity and care.



## SPEAKING UP



At SCAN, doing the right thing is everyone's responsibility. That includes speaking up if something doesn't seem right. Whether you witness a possible violation of this Code, suspect unethical behavior, or simply have a question, you have a duty to raise it.

We understand that speaking up isn't always easy. That's why Courageous Challenge is one of our core Ways of Working. It's a reminder that integrity sometimes requires discomfort and that saying what needs to be said is a form of leadership. Creating barriers to dissent, ignoring concerns, or retaliating against those who speak up is a violation of this Code and our culture.

SCAN employees are the best reflection of our values and behaviors. We are also the strongest resource for knowing what is right and have responsibility for reporting activities that we think could be illegal, unethical, or non-compliant.

If you have any questions regarding compliance with our Code or suspect something violates our Code, you have an obligation to speak up and report it right away. Don't hesitate—it's your duty to report a potential compliance issue as soon as you become aware of it. In fact, failure to report a potential compliance issue may result in disciplinary action up to and including termination.

We acknowledge it takes courage to speak up which is why SCAN has embraced Courageous Challenge as a Ways of Working behavior, asking us to say what needs to be said, not what's easy.

We have made reporting easy by providing several methods in which you can report a violation or potential compliance issue:

- Let your supervisor know. Supervisors have an affirmative obligation to, in turn, report the suspected violation to Human Resources and/or Compliance.
- Contact Human Resources, SCAN's Compliance Officer or your department's assigned Compliance Specialist.

EthicsPoint allows you to submit your report anonymously:



- Report to EthicsPoint online through Viva Central. Click on “Report a Risk Issue” in the Business Links section.
- Call EthicsPoint at 877-863-3362. The number’s also on the back of your SCAN badge.

## WHAT TO EXPECT AFTER MAKING A REPORT

### Confidentiality:

- Your reporting will be kept confidential to the extent possible. When you report a possible or actual violation, SCAN will share the information only to the extent necessary to investigate and correct the issue.
- You may also report anonymously, however, it is important to note if you report anonymously, we may not be able to fully investigate without additional information.

### Non-Retaliation:

- You’re protected from retaliation. We do not tolerate retaliation against anyone who has, in good faith, reported or taken part in an investigation of a possible violation of the Code, policies or the law. Any SCAN employee who tries to intimidate or retaliate against another will be subject to disciplinary action that could include losing their job at SCAN.
- *See the Policy Against Discrimination, Harassment, and Retaliation section in SCAN’s Employee Handbook for more information.*
- *If you have reported an issue and believe you are being retaliated against, contact SCAN’s Human Resources department, or report this issue through EthicsPoint.*

**Follow-Through:**

- Your report will be taken seriously and thoroughly investigated. Investigation summary results may be shared with SCAN's Enterprise Compliance Committee or to SCAN's Compliance Committee of the Board to ensure appropriate oversight of any remediation or corrective action or it could require that we self-disclose the issue to government officials.



# **OBSTRUCTING THE CODE: CREATING BARRIERS TO INTEGRITY & ACCOUNTABILITY**



Living SCAN's Code of Conduct requires more than personal compliance. It requires creating space for others to act with integrity as well. That means fostering an environment where people feel safe to speak up, challenge appropriately, and live out our Ways of Working without fear of consequence.

Any action that obstructs this, whether subtle or direct, is a violation of the Code.

Obstruction may include:

- Dismissing or undermining concerns raised in good faith
- Withholding information or access needed to act ethically
- Discouraging transparency or escalation
- Retaliating, directly or indirectly, against anyone practicing the Ways of Working (including Courageous Challenge)
- Creating a culture of silence, fear, or selective inclusion that discourages accountability or dissent

These actions undermine both our mission and the culture we are committed to building at SCAN.

Anyone found to be obstructing others from upholding the Code, or suppressing behaviors aligned with our Ways of Working, may be subject to disciplinary action, up to and including termination. This applies especially to those in leadership roles, where modeling ethical behavior and protecting open dialogue is not optional, it is expected.

Any perceived obstruction can be reported through Ethics Points, Workday, your direct supervisor or manager.

## RESOURCES AVAILABLE TO YOU

### Compliance Department:

- Online: [Report a Risk Issue](#)
- Email: [ComplianceOfficer@scanhealthplan.com](mailto:ComplianceOfficer@scanhealthplan.com)
- Compliance Department Inquiry: [Home / Service Portal](#)
- Compliance Officer, Liz Cordova:
  - [ecordova@scanhealthplan.com](mailto:ecordova@scanhealthplan.com)
- Chief Compliance, Risk, & Corporate Affairs Officer, Lyn Amor Macaraeg:
  - [l.macaraeg@scanhealthplan.com](mailto:l.macaraeg@scanhealthplan.com)

### Human Resources Department:

- SharePoint Page: [Human Resources - Home](#)
- Location and Office Hours
- Employee Assistance Program (EAP)

### Special Investigations Unit:

- Suspected incidents of Fraud, Waste, & Abuse can be reported:
  - Via EthicsPoint: [SCAN Group | Fraud, Waste, & Abuse Referral Form](#)
  - Via Email: [SpecialInvestigationsUnit@scanhealthplan.com](mailto:SpecialInvestigationsUnit@scanhealthplan.com)

### Information Technology Department:

- Cyber or information security risks can be reported:
  - Via EthicsPoint: [Report a Risk Issue](#)
  - Via Email: [InformationSecurity@scanhealthplan.com](mailto:InformationSecurity@scanhealthplan.com)

### Facilities or Office Security:

- Onsite Monday-Friday: 8AM-5PM
- SharePoint Page: [Facilities - Home](#)
- Email: [FacilitiesHelpDesk@scanhealthplan.com](mailto:FacilitiesHelpDesk@scanhealthplan.com)
- Phone: Extension 4444





# **Protecting Information & Assets: CHAMPION'S MINDSET**



# PROTECTING WHAT WE KNOW



## Confidential Information

One of the reasons SCAN is successful is because we appreciate and care for all of our assets, including employees, information, relationships and tools. Many of us see and use confidential information in the course of our work. This is sensitive information that could cause harm to an individual or organization if it were to be shared inappropriately or become public knowledge. It's our responsibility to protect the privacy, security, and confidentiality of these three kinds of information:

- *Proprietary information* is confidential information that is related to or involves a company or individual. Examples of proprietary information may include:
  - details of a contract negotiation between SCAN and a medical group
  - planned business expansions
  - member, customer, or partner lists
  - pricing or cost information
  - sales information
  - intellectual property of any kind
- *Protected Health Information (PHI)* is a member's confidential information related to their health. This includes:
  - their SCAN member ID number
  - any part of the member's healthcare record, including address, telephone number, email, biometric identifiers
  - information about their health status, services or care received
  - payment history that can be linked to the member
- *Personally Identifiable Information (PII)* is any data that can be used to identify a specific member either directly or indirectly. PII can be sensitive or non-sensitive depending on its nature. Sensitive PII is typically more protected due to the potential for misuse while non-sensitive PII can often be found in public sources.

# PROTECTING WHAT WE KNOW



Examples of *non-sensitive* PII include:

- Zip Code
- Race
- Gender
- Date of Birth

Examples of *sensitive* PII include:

- Full Name
- Social Security Number
- Driver's License Number
- Financial Information (e.g. Credit Card Number)

You should only discuss, share, or ask for proprietary information, PHI, or sensitive PII necessary to your job, and only when there's a clear "need-to-know". When someone outside of SCAN is requesting this type of information, follow your department's job-specific procedures for granting access to confidential information.

If you suspect there's been a breach of confidentiality, it's your responsibility to report it. Upon suspecting a breach, immediately report it via [EthicsPoint](#) or by emailing [PrivacyOffice@scanhealthplan.com](mailto:PrivacyOffice@scanhealthplan.com).

Also, see "What to Do If You Think There's Been a Violation—or Could Be" in the Employee Handbook.

- SCAN's HIPAA (Health Insurance Portability and Accountability Act of 1996) employee training course covers Proprietary Information, PHI, and PII.
- For more on confidential information, see the Confidentiality and HIPAA section in the SCAN Employee Handbook.

# PROTECTING WHAT WE HAVE



## SCAN's Assets and Property

We are responsible for respecting and protecting what belongs to SCAN and using the company's assets and property only as designated. Anything supplied to you by SCAN to do your job or created by you while working for SCAN is considered SCAN's property and remains with SCAN even when you are no longer an employee.

SCAN has the right to review, retain, investigate, access, and disclose any use of a Company asset. This includes emails, instant messages, telephone communications, internet activity, electronic attachments, and other information and/or data. SCAN owns all Company assets, and any information stored on the assets.

Records are created and stored on all devices. Be mindful when using a SCAN resource for any personal communication. The contents of SCAN assets may be disclosed to approved internal resources, external resources, such as law enforcement, government officials, and legal counsel, without your knowledge or permission.

- **Equipment, materials, and supplies** provided by SCAN for you to do your job should only be used for company business. This includes desktops, laptops, tablets, copiers, mobile phones, credit cards and vehicles. While it's SCAN's responsibility to maintain its property, it's your responsibility to take care of it and report any problems or issues.
- **Intellectual property** is a creation of the mind. At SCAN, intellectual property ranges from the company logo to trade secrets to programs developed by the company. Like physical assets, intellectual property belongs to SCAN and must be used only as designated.

## PROTECTING WHAT WE HAVE



- **Artificial Intelligence** or “AI” encompasses various technologies that allows computers and machines to perform tasks that would typically require human-like intelligence. SCAN allows the responsible use of public and enterprise AI tools for work-related purposes. Read the [AI Acceptable Use](#) policy for details on the guidelines and limitations in place when using AI tools.
- **Data/Information Security** refers to the practices and processes designed to protect data from unauthorized access, use, disclosure, disruption, modification, or destruction. The goal is to ensure the confidentiality, integrity, and availability of data. Make sure you are familiar with your department’s record retention policies, never send work related information to your personal email, and beware of phishing or other suspicious emails.
- *For more on this, see the Company Property section in the SCAN Employee Handbook.*

### Property Belonging to Others

At SCAN, we also respect and honor the confidential and proprietary rights and intellectual property of other companies and individuals. It’s why we chose Champion’s Mindset as one of our Ways of Working.

We abide by all applicable laws regarding copyright, trademarks, privacy and financial disclosures. We follow fair business practices, which means we don’t use improper channels to gain information about competitors or spread false information about them.

We lead high performing teams that compete, act and strive to win and continuously improve for our members, the right way, ethically and honestly.



## **Are you ready to protect SCAN's information & assets?**

**Question:** I ran out of time to complete my monthly membership report at the office. Can I email the membership report to my home computer so I can complete it tonight?

**Answer:** No. Mailing protected health information, like member information, outside of SCAN's network or to a personal asset like a computer is prohibited.

**Question:** I work from home, but my internet is out today. Can I work from my friend's house since his internet is working?

**Answer:** It depends. Your work environment must be secure, including ensuring others can't hear or see information you use in your work. If you are the only one at your friend's home, you have a secure connection and your manager approves, you may be able to work at this alternate location.

**Question:** My personal credit card is at its limit, and I need to make an online purchase. Can I use my SCAN credit card as long as I pay SCAN back?

**Answer:** No. A company credit card is a company asset and may only be used for company approved purposes.

**Question:** My department is volunteering at a SCAN sponsored community event next weekend. We want to make matching T-shirts to wear. Can we use the SCAN heart logo on our shirts?

**Answer:** Maybe. Prior to using any intellectual property, like SCAN's logo, ensure you speak with your manager and Legal to seek approval.



# **Integrity in All We Do: RELENTLESS LEADERSHIP**



# ACTING WITH INTEGRITY



Most of us feel we have a basic sense of what's right and wrong, but some choices may not be clear-cut. SCAN expects each of us to hold ourselves and one another accountable for acting with integrity and making hard choices that align with our Relentless Leadership way of working.

Working at a second job outside of SCAN, accepting a favor from a business associate, or giving a token of your appreciation to a member may be well-intentioned, but they could still be against the law, against company policy or a violation of state or federal regulations. To help navigate the grey areas, use these standards to guide your decisions and actions.

## Conflicts of Interest

A conflict of interest is when employment, a personal relationship, or an activity outside of SCAN creates any actual, potential or apparent conflict that may undermine your ability to do your job well or make an objective decision that is in SCAN's best interest.

Think about these activities before you commit and consider if you or anyone in your household stands to benefit.

If there's a potential conflict, you must report it. Staff are required to attest to a Conflict of Interest form upon hire and annually thereafter. Some conflicts are allowed or may be mitigated.

It's important that at any point in time, if your circumstances change, you update your Conflict of Interest form for review.

Examples of Conflicts of Interests that you must disclose include:

- Working at a job outside SCAN that potentially interferes with your position at SCAN.
- Using SCAN information for your own personal purposes.
- Serving as an officer or director of another organization.

- Having ownership interest in another company that does business or competes with SCAN.
- Employing relatives or close friends who report into your department.
- Having a personal or close relationship with a potential vendor or partner wanting to do business with SCAN.



If you are unclear whether a conflict exists, ask your supervisor or SCAN's Human Resources staff for guidance.

- *For more information, refer to the Conflict of Interest section in the SCAN Employee Handbook.*

### **Gifts, Financial Incentives, & Other Rewards**

Our business transactions with vendors, suppliers, contractors and other third parties must be free from influence, or even the appearance of influence. That means that special care needs to be taken when giving or receiving gifts, incentives, or business courtesies. You must never give or receive anything that comes with a personal obligation or that is contrary in any way to SCAN's best interests.

That means bribes, kickbacks or other inducements are never allowed. We are never to use or accept any financial or other type of reward that could be seen as trying to induce:

- Potential or current Medicare beneficiaries to join SCAN.
- Employees or other licensed professionals to deny or limit care.
- Medicare beneficiaries, providers or anyone else to commit fraud, waste or abuse.

SCAN allows the giving and receiving of gifts and/or certain business courtesies subject to certain restrictions. For instance, gifts and/or business courtesies may be given or received when the value is \$150 or less but the value of a gift to a single source may not exceed \$300 within one calendar year.

Solicitation of gifts and/or business courtesies is strictly prohibited as are cash and cash equivalents including checks, money orders, gift cards/gift certificates, stocks, and savings bonds.



- *SCAN's Gift and Business Courtesy Policy can help you determine if a gift is appropriate—and how to request an exception if you think it's warranted.*

## **Political Activity and Lobbying**

SCAN respects the rights of every individual to participate in and contribute to political organizations or campaigns of their choice. We must follow these guidelines when participating in any type of political activity that is not part of our job responsibilities:

- You must participate in these activities as an individual.
- You may not act as a representative of SCAN in any of these types of activities.
- You may not be reimbursed by SCAN for anything related to these activities.

This is also important because SCAN is a tax-exempt, not-for-profit organization. Following the guidelines above will help ensure we are abiding by Internal Revenue Service regulations and maintain our not-for-profit status.

- *If you have any questions about lobbying and political activities, contact SCAN's Public & Government Affairs department.*

## **Examples of Acting with Integrity**

**Question:** I'm a financial analyst at SCAN and saw an opening for a nurse case manager. My sister is a compassionate and successful nurse. Can I refer her to apply for this job opening?

**Answer:** Yes! Since your sister and you will not have a reporting relationship, you are welcome to refer her for this job. If your sister gets the nurse case manager job, ensure both you and your sister updates your Conflict of Interest disclosure form.



**Question:** Money is tight, and I need to get a second job to make ends meet. I've been offered a job at my local library to manage the return desk on the weekends. Can I accept this job and still keep my position at SCAN?

**Answer:** Maybe. Talk about the library job with your manager and ensure the work and hours you are scheduled don't cause conflict or interfere with your job responsibilities at SCAN. If your manager approves and you accept this second job, remember to update your Conflict of Interest disclosure form.

**Question:** One of SCAN's vendors invited me to attend their annual conference for actuaries. The vendor is offering to pay for my travel and waive the conference fee. Can I accept and attend the conference?

**Answer:** Maybe. Depending on the circumstances, accepting the travel and conference from a vendor may create an appearance of a conflict, especially if you are in a position to decide whether SCAN does business with this vendor. Prior to accepting, review this situation with your manager and Compliance to ensure any potential conflict of interest is reviewed.

**Question:** My neighbor invited me to a happy hour where we can meet the candidates running for mayor. My neighbor knows I work at SCAN and wants my opinion on the candidates' perspectives on health care. Can I share my perspectives at this happy hour?

**Answer:** Yes, if you communicate clearly the perspectives you are sharing are your own personal perspectives. Stating that you work at SCAN or providing any perspectives that may be construed as those of SCAN are strictly prohibited.



# Compliant & Ethical Practices

## RELENTLESS LEADERSHIP

### THE CODE: COMPLIANT & ETHICAL PRACTICES

SCAN considers compliance with our Code a priority. Any potential or identified violations of our Code, laws, regulations, policies, or other requirements must be reported to the Chief Risk Officer immediately. Employees or other individuals or organizations that do business with or who violate a SCAN value or principle can expect disciplinary action. Any individual who violates this Code may be subject to disciplinary action, up to and including termination of employment.



Each of us must be ready to take the action necessary to prevent, detect, report and correct any business process or behavior that is inconsistent with this Code of Conduct, the law, SCAN's policies and procedures, or the regulations and sub-regulatory guidance that applies to our work. When we fail to live up to our promises—when we don't behave with integrity, when we bend the rules, or we stray from the values and principles we have all agreed to uphold—then we must be prepared to accept consequences.



- *For more on SCAN's values and what ethical behavior means, refer to the Standards of Conduct section in the SCAN Employee Handbook.*

While SCAN has a zero-tolerance policy for unethical or non-compliant conduct, we also support a culture of mutual respect, tolerance, and personal accountability. Depending on the situation, SCAN may use formal or informal disciplinary action in order to allow an individual to change behavior, learn from their mistakes, and grow both personally and professionally.

- *The Formal & Informal Discipline section in the SCAN Employee Handbook offers more information on this subject.*

## **SCAN's Compliance Program & Trainings**

SCAN's Compliance Program helps ensure that we meet our obligations to comply with governing laws, regulations, regulatory guidance, contract provisions and SCAN policies and procedures. Everyone has a role to play in making our Compliance Program effective. The best way to stay up-to-date on all of what's expected is to timely complete your annual Compliance Program and Code of Conduct trainings. Trainings not completed timely may warrant disciplinary action up to and including termination.

- *To learn more, read SCAN's [Mandated Training Policy](#).*

## What the Code Says...



### When a Regulation or Healthcare Policy is Not Clear

*You've come up against a regulation or healthcare policy you don't understand. Is it really that important to find out what is required?*

Yes! Not understanding a regulatory or healthcare policy requirement doesn't excuse us from having to comply with it. SCAN has a Compliance team ready to help answer any questions you have about regulatory requirements and company policies. They will help you understand not just what a regulation or policy states but also what is the intent of that requirement. Contact your department's Compliance liaison or SCAN's Compliance Officer or send an email to [compliance411@scanhealthplan.com](mailto:compliance411@scanhealthplan.com).

## Fraud, Waste, & Abuse (FWA)

Fraud, waste, and abuse (FWA) are special types of potential compliance issues that have become a serious problem impacting the overall cost of healthcare. FWA happens when an individual or organization uses resources inefficiently or inappropriately, bends the rules or intentionally deceives for their or another's benefit.

FWA is unethical and illegal and almost always hurts our company and the members we serve. Studying and identifying defects in our processes to improve the member experience is the core of our Member Obsession Way of Working. We can all do what is right and in the best interests of our members, by being on the lookout for FWA.

SCAN does not tolerate fraud, dishonesty, or criminal conduct of any kind. This holds true for ourselves as well as everyone we do business with—providers, brokers, health plans, pharmacies, pharmacy benefit management companies, and even our members. Each of us at SCAN must pledge to promptly report any potential or actual instances of fraud, waste or abuse that we encounter in our daily work.



Here's how you can report any potential FWA:

- Tell your manager
- Send the Special Investigations Unit (SIU) an email at [SpecialInvestigationsUnit@scanhealthplan.com](mailto:SpecialInvestigationsUnit@scanhealthplan.com)
- Go to the SIU SharePoint page
- Report anonymously via EthicsPoint



SCAN's SIU focuses on raising awareness of FWA, including how to prevent it and how to better find and investigate potential FWA cases. Common examples of FWA include:

- Unusual claim patterns, including spikes, unrealistic care practices (more than 24 hours/day), duplicate claims
- Member reports of services not received but for which an Explanation of Benefits (EOB) was sent to them
- Appearance of altered documents

### **Compliant & Ethical Examples:**

**Question:** I saw my coworker recording a Tik Tok video on her phone this morning. Her computer screen behind her had a membership record displayed and the video captured the contents of her computer screen. I know she didn't mean to include this protected data. Since this was an accident, do I need to report my concern?

**Answer:** Yes. Our Code of Conduct requires each of us to report any suspected or actual violation of our Code, laws, regulations, policies or other requirements timely. Failure to do so may result in disciplinary action up to and including termination.

**Question:** I noticed an unusual claim from a primary care physician. The services provided would only be appropriate for a female youth but were included on the claim for an 80-year-old male. Should I report this to SIU?

**Answer:** Yes. SIU has the resources and tools to investigate this claim and determine any potential wrongdoing.

**Question:** I spoke with a member today who was concerned after receiving an EOB in the mail. The date referenced in her EOB was when she was in New York visiting her daughter and she didn't go to the doctor. What should I do?



**Answer:** Thank the member for calling and sharing her concerns. Then, report the details of this member's call to the SIU so they can investigate the situation.

- *For more on FWA, go to the Anti-Fraud Program section in the SCAN Employee Handbook.*

### **What the Code Says...**



#### **Finding Suspicious Activity by a SCAN Member**

*You think a member let someone else use his SCAN ID, and you're wondering if you should call him to double-check.*

Better not to call. Instead, report it to SCAN's SIU team, along with the details that made you suspicious in the first place. They will investigate and take appropriate action if it is indeed fraud.

### **What the Code Says...**



#### **Uncovering Potential FWA by a Provider**

*You've noticed that one physician orders extensive lab work, regardless of the diagnosis. Is she just being thorough or is this FWA?*

Report this issue so the SIU team can investigate. Ordering and getting reimbursed for unnecessary tests are considered abuses of the Medicare program.

