

**ACCIDENT FUND HOLDINGS, INC.**  
**VENDOR AND SUPPLIER CODE OF BUSINESS CONDUCT**

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## **OVERVIEW**

In today's business world, acting ethically and with a high degree of integrity differentiates a company from its competition as an organization that can be trusted. Accident Fund is committed to conducting business with integrity, in an ethical manner, and in compliance with established laws and regulations.

This Vendor and Supplier Code of Business Conduct applies to those who conduct business with or on behalf of the Company such as vendors, suppliers, consultants, and subcontractors. Accident Fund recognizes that Vendors and Suppliers are independent entities and their cultural environments may be different from Accident Fund's; however, Vendors and Suppliers have a critical role in our success, and Accident Fund strives to conduct business with those who share similar values in compliance and ethics. Therefore, our Vendors and Suppliers and their employees are expected to share and subscribe to Accident Fund's commitment to ethical business practices. The Code sets the ethical tone for conducting business with Accident Fund.

## **ACCIDENT FUND'S OBLIGATION TO OUR VENDORS AND SUPPLIERS**

The Code is part of our way of life at Accident Fund. Corporate ethics and corporate compliance are related concepts, but not identical. Ethics are part of the culture of an organization. They provide a framework for decision making by guiding employees to always consider and do the "right thing." This framework focuses on guiding employees on how and why to follow the rules. Compliance is the requirement that all employees, vendors, and suppliers abide by all applicable laws and regulations.

Our employees must strive to maintain these high standards as they conduct the company's business. Maintaining these high standards is the key to our continued success. The standards require all employees and others acting on behalf of the Company, to act with honesty, integrity and impartiality when dealing with customers, providers, suppliers, regulators, competitors, community, fellow employees, board and council members. To earn and keep your trust, employees must make every effort to avoid even the appearance of illegal or unethical conduct.

Our senior leadership and board of directors are committed to providing avenues through which ethical issues may be raised, reviewed, and resolved openly and honestly. Help is available when you have questions about how to maintain ethical standards. If you are in a situation that raises an ethical issue, and you need help, follow the guidelines under the heading, "How to Report Ethical Concerns".

## **ACCIDENT FUND'S EXPECTATIONS OF OUR VENDORS AND SUPPLIERS**

Accident Fund strives to provide an environment that promotes fairness and equal opportunity, where differences in backgrounds are to be respected, and discrimination is not tolerated. Accident Fund in turn expects its business partners to respect and share this commitment.

Vendors and Suppliers have the responsibility and are expected to respect the Code and to conduct business activities and interactions ethically and with integrity. As such, Vendors and Suppliers are asked to adhere to the following standards when conducting business on behalf of Accident Fund:

## **VENDOR AND SUPPLIER ETHICAL AND COMPLIANCE STANDARDS**

- Aspire to maintain a culture that not only embraces the principle of doing the right things, but also doing things the right way.
- All Vendor and Supplier employees have the responsibility to epitomize Accident Fund's values and to perform their job ethically and with integrity.
- All Vendor and Supplier employees have the responsibility to treat those who you encounter with professional respect and courtesy, regardless of their position, age, race, sex, religion, national origin, ancestry, creed, sexual orientation, mental or physical disability, veteran status, or any other differences of a personal nature while conducting business with or on behalf of Accident Fund.

## **VENDOR AND SUPPLIER LEGAL AND REGULATORY COMPLIANCE**

- Conduct business activities in compliance with all applicable laws and regulations while conducting business with and on behalf of Accident Fund.
- If applicable, comply with all anti-corruption laws, including the United States Foreign Corrupt Practices Act, and not make any direct or indirect payments of (including promises to pay, or authorizations to pay) money, gifts or anything of value to officials of foreign governments.
- If applicable, comply with antitrust and fair competition laws and regulations when conducting business with or on behalf of Accident Fund.
- Retain and dispose of Accident Fund business records in compliance with all applicable legal and regulatory requirements.

## **SAFE, HEALTHY AND HARASSMENT-FREE WORK ENVIRONMENT**

To continue to keep our company a safe and healthy workplace, Vendors and Suppliers are expected to:

- Not engage in harassing behavior, which may be of sexual, physical, written, or verbal nature, towards our employees, customers, vendors, suppliers, outside business invitees and visitors.
- Not disrupt business or place employees or visitors at risk of harm.
- Treat everyone, including Accident Fund employees with dignity and respect.
- Not possess, use, and/or distribute illegal drugs, alcohol, marijuana (regardless whether it is for medicinal purposes), and/or firearms while on Accident Fund owned or leased property.

## **CONFLICT OF INTEREST**

- Vendors and Suppliers must avoid actual, or the appearance of, conflicts of interest while doing business with Accident Fund by complying with the following:
  - Must not deal directly with any Accident Fund employee who has a significant financial interest in the Vendor or Supplier, or whose spouse or immediate family member holds a significant financial interest in the Vendor or Supplier, in the course of negotiation or performance of the contract.

- Must not deal directly with any Accident Fund employee who is the spouse or immediate family member of the Vendor or Suppliers' representative.
- Must not influence a business decision either directly or indirectly through the Vendor or Suppliers' position with Accident Fund which allows for personal gain or may adversely affect Accident Fund.

## **GIFTS, GRATUITIES, AND KICKBACKS**

- Vendors and Suppliers must cooperate with Accident Fund's policy regarding gifting and avoid offering gifts or anything of significant value to Accident Fund employees where a business decision could be, or could be perceived to be, compromised as a result of the significant gift.

## **INFORMATION SECURITY / CONFIDENTIALITY**

- A significant amount of Accident Fund's business involves the processing and use of information that is private and sensitive and protected by numerous federal and state laws. Both Accident Fund and its Vendors and Suppliers must abide by these laws to the extent applicable by:
  - Protecting the security of computer systems.
  - Protecting information used to access computers, networks or systems. Protecting information used to access computers ultimately protects your company as well as Accident Fund.
  - Safeguarding the confidentiality of personal and health information, if applicable. Vendors and Suppliers may be exposed to confidential personal and health information. They may use and disclose it only as permitted or required by law, the contract, or any of our corporate privacy policy and procedures.

## **CUSTOMER AND SUPPLIER RELATIONS**

- Vendors and Suppliers are expected to maintain straightforward business relationships with Accident Fund. Vendors and Suppliers cannot take unfair advantage of Accident Fund customers through manipulations, coercion, misrepresentation of information, or abuse of privileged information.

## **PROPER USE OF COMPANY ASSETS**

- Vendors and Suppliers should use Accident Fund corporate assets only for valid business purposes. Accident Fund corporate assets include not only our equipment, funds, and office supplies, but also concepts, business strategies and plans, financial data, and other information about Accident Fund's business. These assets may not be used to derive personal gain.

## **COMPLYING WITH THE VENDOR AND SUPPLIER CODE OF BUSINESS CONDUCT**

- Vendors and Suppliers are expected to be knowledgeable of and adhere to the Code. They are expected to seek guidance from Accident Fund when questions arise involving ethics and business conduct pertaining to company business and employee behaviors.

## **ADHERENCE TO FRAUD, WASTE AND ABUSE GUIDELINES**

- Generally, fraud is a misstatement of fact knowingly made for the purpose of obtaining benefits, services, or other things of value.
- Vendors and Suppliers must not make false claims, records, or statements in order to secure payment of a fraudulent claim on behalf of Accident Fund.
- Accident Fund has policies and procedures in place to detect and prevent fraud, waste, and abuse, and expects vendors and suppliers to support the efforts of federal and state authorities in identifying and reporting incidents of fraud, waste, and abuse.
- Vendors and Suppliers who raise questions or report concerns regarding potential or actual fraud, waste, and abuse matters are protected from retaliation and retribution under all applicable anti-retaliation protections.

## **HOW TO REPORT ETHICAL CONCERNS**

Vendors and Suppliers are expected to immediately report an employee of the Company, or anyone acting on behalf of the Company, that has engaged in illegal or otherwise improper conduct. The Vendor or Supplier may contact the Company's compliance and anti-fraud hotline at 800-482-3787, where information may be shared anonymously if you choose.