

# Affordable Health Insurance Agency

# Code of Conduct 2024

### **Code of Business Conduct and Ethics**

This Code of Business Conduct and Ethics (the "Code") is designed to promote honest, ethical, and lawful conduct by all Independent Agents, Officers, and Directors of Affordable Health Insurance Agency and all subsidiaries and entities controlled by it (collectively, the "Company"). The Code is to facilitate Independent Agents, Staff Persons, Managers, Officers, and Director's understanding of the Company's standard of ethical business practices. And provide awareness of ethical and legal issues encountered in carrying out their day-to-day responsibilities.

The actions of every Independent Agent, Staff Person, Manager, Officer, and Director affect the Company's reputation and integrity. Therefore, each person must take time to review this Code, understand it and carry out its provisions. In particular, all Independent Agents, Staff Persons, Managers, Officers, and Directors are expected to:

- Ethically conduct business with courtesy, trustworthiness, dignity, and respect for the rights of all persons working on behalf of the Company. In conjunction with this, Independent Agents must not use any coercion, deception, sympathy, appeal, or other high-pressure tactics to sell or market products or to recruit new prospects.
- Never make false or negligent statements or engage in activities that could damage or be detrimental to the Company's image and integrity or its business affiliates.
- Avoid conflicts between personal and professional interests and display ethicality when handling actual or apparent conflicts of interest. This includes full disclosure to a responsible supervisor or the Company's Compliance Officer of any transaction or relationship that could become a conflict of interest.
- Comply with all governmental rules and regulations applicable, but not limited to, to the marketing, distribution, and sale of all products represented by the Company.
- Comply with all laws, rules, and regulations set forth by HIPAA or any national, state, or local government. Such regulations include, but are not limited to, the receipt, transmission, storage, and disposal of all protected personal information, including PHI and ePHI. Including any other personal information deemed protected, sensitive, or nonpublic by HIPAA or common law.
- Adhere to all CMS (Centers for Medicare and Medicaid Services) regulations. It is your responsibility to ensure that not only yourself but all of your business partners are complying with all CMS rules and regulations.
- Promptly report to a responsible supervisor, the Compliance Officer, or other appropriate internal authority any violation of this Code.
- Be accountable personally for adherence to this Code.

All Independent Agents, Staff Persons, Managers, Officers, and Directors must disclose to and seek guidance from a responsible Manager, the Compliance Officer, or other appropriate authority any violation of this Code. Failure to follow this Code and comply with federal, state, and local laws and the Company's corporate policies and procedures may result in punishment up to and including termination of the contract.

### **Conflict of Interest**

A conflict of interest occurs when an individual's private interest interferes in any way — or gives the appearance of interference with the Company's interests as a whole. The Company expects all Independent Agents, Staff Persons, Managers, Officers, and Directors to exercise sound judgment and the highest ethical standards in their activities on behalf of the Company and their private activities outside the Company. Merely an appearance of a conflict can negatively reflects the Company and its reputation, even if there is no actual conflict present.

# **Privacy of Protected Health Information / PHI**

Current or previous Independent Agents, Staff Persons, Managers, Officers, and Directors may not use PHI/confidential information for their personal use or share that data with others outside of the Company unless authorized to do so and is in good faith and accordance with the day to day operations of the business. Confidential information is any nonpublic data that might be of use to competitors or criminals or harmful to the Company or its customers. Criminals can use personal information for identity theft and fraud, among other things, and it is your responsibility to keep this information private. Independent Agents, Staff Persons, Managers, Officers, and Directors should not disclose any information about the Company or its business to the media or public without the Company's express consent.

## Fraud, Waste and Abuse

The Company is committed to detecting and preventing fraud, waste, and abuse. The Federal False Claims Act (FCA) and similar state laws prohibit knowingly presenting false or fraudulent claims or making a false record or statement to secure payment from a government-sponsored program. Independent Agents, Staff Persons, Managers, Officers, and Directors conducting business with the Company have an obligation to report any ethical misconduct, including concerns about potential false claims, to the Compliance Officer or other appropriate authority. As set forth elsewhere in this Code, retaliation against an individual making a report of a violation of the Code is prohibited. Reporting of Fraud, Waste, and Abuse may be done using the hotlines or methods listed below.

# Compliance Officer at Affordable Health Insurance Agency:

Alexis Horton (210) 738-3537 extension 8017. E mail: alexis@ahiabenefits.com

Office of the Inspector General Fraud Hotline: 1-800-447-8477

# Compliance with Laws, Rules and Regulations

All Independent Agents, Staff Persons, Managers, Officers, and Directors must comply with all applicable laws, rules, and regulations that govern our industry. The Independent Agent's responsibility is to know and adhere to the applicable laws and regulations that impact their line of work and understand them well enough to be aware of potential violations and when to seek

advice. The Independent Agents must follow these guidelines and notify the proper authorities of any breaches.

# Maintaining a Safe, Healthy and Affirmative Workplace

The Company commits to maintain a work environment free of sexual, racial, or other harassment and from acts or threats of violence. The Company will not tolerate offensive material on company property, computers, or other equipment. The Company is also committed to a drug-free workforce. Unlawful possession or consumption of any drug or controlled substance is strictly prohibited.

# **Company Assets**

Every Independent Agent, Staff Persons, Managers, Officers, and Directors have a personal responsibility to protect the Company's assets and ensure their efficient use. The Company's assets include intangible assets, such as corporate opportunities, intellectual properties, trade secrets, and business information (including any nonpublic information learned as an Independent Agent, Officer or Director of the Company).

#### Identification

All Independent Agents, Staff Persons, Managers, Officers, and Directors will always clearly identify themselves and their AHIA relationship. Disclose that they are a licensed insurance agent and never imply in any manner that they are a team member of any Insurance Entity or the U.S. government.

#### **Violations of this Code**

Allegations of Code violations will be reviewed and investigated by the Company's Compliance Officer and Management. Violations of this Code may result in disciplinary action prescribed by state and federal law. Furthermore, AHIA will not tolerate any retribution or retaliation acts against an individual reporting, in good faith, a known or suspected violation.

# **Code of Conduct Approval and Distribution Process**

This Code of Conduct is reviewed by the Compliance Officer annually. A new version is created if any changes are needed. The Code of Conduct is made available to Independent Agents. As a condition of carrier requirements, all Independent Agents must certify that they have received, read, and will comply with all Code of Conduct components.

Date	Revision	Reason for Change	Sections Affected
	No.		
09/26/2018	1.3	Review of Original Document	All
02/13/2020	1.4	Review and Update of Original Document	All
01/25/2021	1.5	Review and Grammatical Update of Original Document	All
01/25/2023	1.6	Review and Update of Original Document	All

# **Acknowledgement of Receipt and Understanding**

By signing this Code of Conduct, I attest that I have read, understand, and adhere to all Code

elements and all policies and procedures addressed in the	e Compliance Program Charter.
Signed By:	Date:
Printed Name:	
Compliance Officer Signature:	