

Florida Blue has a long-standing and deep commitment to conduct business ethically, with integrity, and in compliance with the law. We expect our suppliers to uphold our commitment to compliance by complying with the Florida Blue Principles of Conduct for Suppliers.

Florida Blue Principles of Conduct for Suppliers

The Florida Blue Principles of Conduct for Suppliers or “Principles” apply to all suppliers that provide goods or services for or on behalf of Florida Blue and its subsidiaries and affiliates. These Principles outline our expectations for suppliers and suppliers must ensure their personnel, agents, and subcontractors comply with these Principles.

Key Requirements

Potential suppliers are required to register as a Florida Blue supplier and, when applicable, communicate and work exclusively with Florida Blue’s Corporate Procurement department during sourcing and contracting events until a contract is fully executed.

Prior to registering as a Florida Blue supplier participating in a procurement event, suppliers will be requested to provide confirmation that they have received, fully read, and understand these Principles and the supplier, its personnel, and subcontractors will conduct business in accordance with these Principles.

Fair Business Dealings

- **Conflicts of Interest:** Suppliers must conduct themselves in such a manner as to avoid activities and situations that create even the appearance of a conflict of interest. Suppliers must also disclose any transaction or relationship that may place the supplier in an actual or potential personal or organizational conflict of interest.
- **Reciprocity:** Florida Blue is committed to dealing fairly and expects the same of suppliers. Being a customer of Florida Blue is never a condition for being a Florida Blue supplier. Additionally, being a customer does not grant any preferred status as a supplier. Suppliers shall not use their position as a customer to gain an unfair advantage or otherwise coerce or influence a purchase by Florida Blue.
- **Gifts and Courtesies:** Suppliers must not offer, directly or indirectly, gifts or gratuities, including entertainment, meals or anything of value, to any Florida Blue employee or contractor involved in the procurement process or a purchase decision or when a business decision is or could be considered to be influenced by such action. Suppliers must agree to comply with all anti-kickback, gift and gratuity laws and regulations applicable to federal and state programs and contracts. Suppliers shall not, directly or indirectly, request, accept, solicit, offer, or receive any gift, payment or anything of value for favorable treatment, or because of an act in connection with a federal or state program or contract.

Protection of Shared Information

- **Confidential and Proprietary Information:** Suppliers are not permitted to disclose, copy, or use Florida Blue confidential and proprietary information for any purpose unless permission is received from Florida Blue. Protecting Florida Blue confidential and proprietary information is required by the supplier even after contractual obligations have been completed.
- **Records Retention:** Suppliers are required to maintain accurate and complete records of all matters related to their business relationship with Florida Blue. All records must be stored for the period of time required by applicable law or as noted within the contractual agreement with Florida Blue, whichever is longest.
- **Public Mediums:** Suppliers are prohibited from sharing information regarding their contractual obligations or relationship with Florida Blue with third parties, including the press or through social or business networking sites, chat rooms, or blogs.

Safeguarding Company Assets

- **Property and Physical Assets:** Suppliers may only use Florida Blue property and physical assets to fulfill valid contractual obligations with Florida Blue and may not be used for personal gain.
- **Intellectual Property:** Suppliers are not permitted to use or acquire any right, title, or interest in Florida Blue intellectual property. This includes, but is not limited to, copyrights, trademarks, service marks, patents, registered designs, trade secrets, methods, know-how, processes, and inventions. Use of all Florida Blue intellectual property is subject to prior written approval from Florida Blue.
- **Insider Information:** Suppliers may not buy, sell, trade or recommend securities based on insider information that is acquired as a result of their business relationship with Florida Blue.
- **User IDs and Passwords:** Use of Florida Blue issued IDs and passwords shall be limited to authorized Florida Blue business use. Suppliers must comply with all Florida Blue policies to ensure passwords and data remain private and confidential while utilizing Florida Blue’s information systems and buildings.

Background Checks

- **Background Checks:** Supplier must comply with our background check requirements.

Government Compliance

- **Federal Contracts and Programs:** Suppliers whose contractual obligations support federal health care programs, such as Medicaid or Medicare Advantage, or federal contracts, like FEHBP or traditional Medicare, are prohibited from business dealings with persons and entities that have been debarred, suspended, or declared ineligible to participate in government contracts or programs. Suppliers are responsible for guaranteeing adequate screening is administered to ensure the supplier and its principals and subcontractors are not suspended, debarred or otherwise excluded from participating in any federal contract or health benefit program.
- **Government Interactions:** Suppliers may not mislead, directly or indirectly, government entities or officials and must cooperate with government-related audits and requests, including access to records or facilities. Suppliers must ensure that all deliverables and requests for payment are accurate and a supplier shall not make, on behalf of itself or Florida Blue, any false record, claim, representation, material omission or statement in conjunction with any federal or state program or contract.

Maintaining a Safe Work Environment

- **Harassment-free Workplace:** Disruption of business, disorderly or illegal conduct, or placing employees, suppliers, or visitors at risk of harm through acts of unprofessional behavior or violence, including threats, is strictly prohibited and will not be tolerated.
- **Business Operations:** Suppliers must maintain a safe work environment and comply with all applicable laws and regulations as it relates to business conduct or operations.

Monitoring and Compliance

We reserve the right to audit the supplier or supplier's subcontractors to verify compliance. Failure to comply with these Principles may result in our right to discontinue current or future business relationships or withdraw a supplier's status as a Florida Blue "approved" supplier.

Acknowledgement:

In addition to following these Principles, suppliers must comply with the Florida Blue Compass Code of Conduct and any other specific contractual requirements that may be set forth in a business agreement with Florida Blue. The Florida Blue Compass Code of Conduct and specific contractual requirements take precedence over these Principles if they conflict.

By accepting the material contained in the Florida Blue Principles of Conduct for Suppliers, you confirm the following:

- You are authorized on behalf of your company to sign and accept the Florida Blue Principles of Conduct for Suppliers.
- You have received and reviewed the Florida Blue Principles of Conduct for Suppliers.
- You and your company will fully comply with the Florida Blue Principles of Conduct for Suppliers.
- You and your company understand that additional restrictive requirements may also be set forth in the business agreement with Florida Blue.

Florida Blue Values:

Florida Blue's procurement process adheres to the moral and ethical principles that encompass our core values of Respect, Integrity, Imagination, Courage, and Excellence.

These values outline the way we partner with our customers and suppliers to minimize cost and bring value-added, strategic goods and services to our organization.

Respect

Across Florida, we offer our employees fair treatment and opportunities for personal and professional development. We respect and value the collaboration of our colleagues and business partners.

Integrity

Florida Blue adheres to strong ethical and uncompromising legal standards in every aspect of our business and expects all members of our community to act in accordance with their own beliefs and our shared values.

Imagination

To fulfill our vision of helping people and communities achieve better health, Florida Blue continually seeks innovative and creative ways to meet the needs of our customers.

Courage

Courage allows us to act with confidence and resolve in the face of uncertainty and risk. Courage drives principled, effective leaders in business and it is a value that allows us to embrace change and challenge the status quo.

Excellence

At Florida Blue, high expectations and goals are the standards that we choose for each other and ourselves because rigor instills excellence.