



Compliance Is Everyone's Responsibility

**Capital District Physicians' Health Plan Inc. and its Subsidiary Corporations,
Capital District Physicians' Healthcare Network, Inc. and CDPHP Universal Benefits,® Inc.**

CORPORATE COMPLIANCE POLICY

1. It is the policy of Capital District Physicians' Health Plan, Inc. and its subsidiary corporations, Capital District Physicians' Healthcare Network, Inc. and CDPHP Universal Benefits,® Inc. (hereinafter referred collectively as "CDPHP®"), to comply with all applicable federal, state, and local laws and regulations, both civil and criminal.
2. In addition to complying with the law, it is also the policy of CDPHP to comply with the Standards of Conduct.
3. No employee, agent, independent contractor, or business associate of CDPHP has any authority to act contrary to the provisions of these laws or Standards of Conduct or to authorize, direct, or condone violations by any other employee, agent, independent contractor, or business associate.
4. Any employee, agent, independent contractor, or business associate of CDPHP who has knowledge of activities that he or she believes may violate corporate policy or the law, including the submission of false claims, has an obligation, promptly after learning of such activities, to report the matter. The method used to report the matter is up to the reporting party. The reporting party may report it to a supervisor (if applicable), directly to the Compliance/Privacy Officer, the Vice President, Human Resources, or the Chief Executive Officer. Security concerns may be reported to the CDPHP Security Officer. Additionally, reports may also be filed by calling the CDPHP Fraud, Abuse, and Compliance hotline at 1-800-280-6885. All compliance reporting paths/communication lines used for good faith reports of potential compliance issues are confidential. The Fraud, Abuse, and Compliance hotline should be used to submit an allegation anonymously. CDPHP will not tolerate any form of retaliation against a person for reporting an issue in good faith. Failure to report known violations, failure to detect violations due to negligence or reckless conduct, or making false (or bad faith) reports shall be grounds for disciplinary action, up to and including termination. Any reports of harassment or other workplace-related problems shall be referred directly to Human Resources.
5. CDPHP will take steps to communicate its standards and policies to all employees by requiring participation in training programs and by disseminating information that explains in a practical manner what is required. This will include dissemination of the Standards of Conduct as well as an Acknowledgment signed by each employee to abide by the Standards of Conduct and the Corporate Compliance and Integrity Program.
6. CDPHP will take steps to achieve compliance with its standards by utilizing monitoring and auditing systems reasonably designed to detect misconduct by its employees, agents, independent contractors, or business associates by having in place and publicizing a reporting system whereby employees, agents, independent contractors, or business associates can report misconduct by others within the organization without fear of retribution.
7. This Corporate Compliance Policy will be consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for the failure to detect violations. The appropriate form of discipline will be case-specific and consistent with existing Human Resource policy.
8. After a violation has been detected, CDPHP will take all reasonable steps to respond appropriately and to prevent further similar violations, including any necessary modifications to its compliance program to prevent and detect violations of law.
9. This Corporate Compliance policy is intended to communicate current general policies regarding compliance. The Chief Executive Officer or designee is charged with adopting such other policies, procedures, and Standards of Conduct as may be necessary and desirable to implement and maintain the Compliance Program. If any employee, agent, independent contractor, or business associate has a question concerning a particular provision contained herein or concerning any practice not addressed in this document, he or she should consult directly with the Compliance Officer.