



MEDICAL MUTUAL OF OHIO®

And Its Family of Companies

Corporate Policy

SIGNATURE Code of Conduct

Policy No. 2002.002	Responsible Area: Corporate Audit Department		
Date Approved: 05/29/02 08/01/03 08/09/04 03/02/05 06/16/05 03/13/06 06/14/06 06/13/07 06/13/08	Approved by: Board of Trustees	Date Reviewed/Revised: 08/01/03 08/09/04 02/28/05 06/16/05 11/07/05 12/12/05 03/13/06 06/13/07 06/13/08	Revision No.: 2003-001 2005-001 2005-002 2006-001

LETTER FROM THE CHAIRMAN, PRESIDENT AND CHIEF EXECUTIVE OFFICER

March 13, 2006

To Trustees, Directors, Officers, and Employees of Medical Mutual:

At Medical Mutual we conduct our business with the highest degree of honesty and ethical behavior. These standards are the cornerstone of our work, allowing us to develop and market superior health insurance products and services, to provide outstanding customer service, and to excel in all that we do. We are direct, clear, and ethical in our communications and actions. We speak with honesty, courage, and care. We are accountable for our words, our work, and our processes - leading to a challenging and rewarding work environment.

This Code of Conduct is intended to clarify to you our fundamental corporate business values. It is by no means an exhaustive account, but rather a summary of some of the more important standards that underlie our business ethics and professional integrity. These standards should apply to all trustees, directors, officers, and employees. Additionally, specific policies apply within individual areas of responsibility. Please familiarize yourself with these policies as well.

Two of our values are especially important:

- As an Equal Opportunity Employer, the Company endorses the basic national policy that all citizens are entitled to equal employment opportunities regardless of race, religion, color, sex, age, national origin, disability or veteran status or other protected characteristic.
- While all forms of harassment are prohibited, we want to emphasize the fact that sexual harassment will not be tolerated.

After reading this Code of Conduct, I encourage you to discuss its content with others and to ask questions if any items are not perfectly clear. Should you know of any events or transactions that violate these policies, your responsibility is to communicate the information promptly to your manager, Human Resources, the Legal Department, or to the Compliance Officer. Understanding, communicating, and working together are what make our policies effective, our workplace outstanding, and our position in the marketplace competitive.

Thank you,
Kent W. Clapp
Chairman, President & CEO

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This Code of Conduct is not intended to express or imply a contract or promise of employment, nor is it intended to alter the employment-at-will relationship in any way. The Company may add to, revoke, or modify this Code at any time, with or without notice.

CODE OF CONDUCT OVERVIEW

The character, performance, and reputation for integrity of Medical Mutual of Ohio and its subsidiaries ("the Company") depend upon the actions of its trustees, directors, officers, and employees (hereinafter referred to as "employees"). It is important that each employee understands the standards of conduct, and takes responsibility for their actions for which he or she shall be held accountable.

It is the responsibility of each employee:

1. To be familiar with the Code of Conduct ("Code") and to adhere to all Company policies and procedures. Claims of ignorance, good intentions, and using poor judgment will not be accepted as excuses for noncompliance;
2. To perform assigned tasks in a responsible, reliable, and cooperative manner and with a commitment to high levels of quality and productivity;
3. To avoid any activity, interest, relationship, or situation that involves or may be perceived as involving a conflict between his or her own personal interests and those of the Company;
4. To protect the assets of the Company, including confidential and proprietary information; and,
5. To represent the Company in an ethical and law abiding way and to be sensitive to the needs and justifiable expectations of the various constituencies we serve, including our customers, our fellow employees, the provider community, and local and national communities and governments.

Every employee plays a major role in the development and protection of the Company's reputation for integrity. In that role, each employee must abide by this Code and use it to guide his or her conduct.

The Code is not meant to be a comprehensive set of rules nor is it meant to replace the Employee Guide but it is intended to serve as a guide to ethical behavior and to reinforce Company policy and procedures.

Since it is the intent of the Company to comply with the requirements of all laws and regulations applicable to its business, the Code identifies principles, violation of which are never acceptable and will always be deemed to be outside the scope of each employee's employment with the Company.

In addition, the Company intends to enforce this Code and thus violations could lead to sanctions, up to and including termination, as well as civil and criminal liability in some situations.

COMPLIANCE OFFICER

The Vice President and General Auditor shall act as the Company's Compliance Officer for Code of Conduct Purposes. The Compliance Officer is responsible for the dissemination of information, training, monitoring, and overall maintenance of the Code.

Ambiguities arising from the implementation of the Code shall be reported to the Compliance Officer without retribution.

The Compliance Officer is responsible for directing the investigation of all violations or suspected violations of the Code and shall report the results of all violations to the Audit Committee of the Board of Trustees, the full Board of Trustees, and law enforcement as necessary.

EMPLOYEE / MANAGEMENT RESPONSIBILITY

All employees are responsible for knowing, understanding, and abiding by the Code and have an obligation to report actual or suspected violations.

Management must set an example by creating an ethical workplace and serving as a role model by implementing and upholding the Code. In addition, management expects its contractors and business partners to do business with the highest degree of honesty and ethical behavior, and follow policies similar to those in the Code of Conduct.

REPORTING VIOLATIONS

COMPLIANCE HELPLINE: **216-687-7722**
1-800-762-8130

COMPLIANCE POST OFFICE BOX: **Medical Mutual of Ohio**
P.O. Box 94814
Cleveland, Ohio 44101-4814

COMPLIANCE OFFICE: **MAIL ZONE 01-6B-1210**

Our Company is committed to the policy that **all employees have an obligation to report problems or concerns involving ethical or compliance violations**. If you are uncomfortable discussing compliance concerns with your Manager or Human Resources you may raise the issue directly with the Compliance Officer.

Under the Federal Sentencing Guidelines, companies have a special obligation to prevent employees from committing federal crimes as agents of the Company. Companies also have a special obligation to report the commission of such crimes. Without in any way trying to

catalogue a list of possible situations, bribery of federal officials or tampering with records relating to government medical programs are two obvious examples.

The Compliance Helpline and Post Office Box are available to all employees for questions regarding the Code, as well as, a means to report violations or suspected violations. All inquiries received are confidential. It is not necessary to identify yourself. However it is necessary to provide enough information about the incident to allow the Compliance Officer to initiate an investigation. The anonymity of each caller is preserved in that no attempt is made to identify the number of the caller. All conversations are considered confidential and not recorded.

All inquiries, whether via phone or post office box, can be made without fear of retaliation. No employee will be punished or subject to reprisal by the Company because he or she in good faith reports a violation or suspected violation of this Code.

Investigational information will be reported to law enforcement or regulatory agencies as required.

PERSONAL BEHAVIOR

The Company is committed to maintaining a work environment where everyone is treated with respect, honesty, and dignity.

Employees must make responsible use of Company resources, including time, equipment, supplies, and facilities. An accurate accounting of expenses incurred on behalf of the Company must be reported through expense reports.

Employees must avoid conduct that interferes with operations or discredits the Company or its employees. Disciplinary action up to and including termination and prosecution, if appropriate, will be taken for the actions that include but are not limited to:

- Theft, fraud, or misappropriation of the Company's money or property, and destruction of or deliberate damage to Company property.
- Falsification of Company records or reports.
- Making false, misleading, or purposefully inaccurate oral or written statements to any employee, customer, regulator, or law enforcement official.
- Reporting to work under the influence of alcohol, illegal drugs or controlled substances, or being involved in the sale, manufacture, distribution, or possession of any illegal substance or drug paraphernalia on Company premises, on Company business, or while operating a vehicle while on Company business.
- Possession of weapons of any kind or brandishing of any object that could reasonably be perceived as a weapon.

- Engaging in conduct that violates federal or state laws or regulations, such as violent behavior, sexual harassment, or discrimination.

POLICY REFERENCES:

- *Attendance Policy - Policy No. 2004.012*
- *Compliance with Laws - Policy No. 2003.004*
- *Corrective Counseling - Policy No. 2000.130*
- *Equal Employment Opportunity - Policy No. 2000.220*
- *Expense Reimbursement - Policy No. 2000.230*
- *Sexual Harassment - Policy No. 2000.640*
- *Solicitation - Policy No. 2000.670*
- *Substance Abuse - Policy No. 2000.690*
- *Weapon-Free Workplace - Policy No. 2004.002*
- *Work Place Violence - Policy No. 2000.760*

COMPANY FUNDS AND PROPERTY

Company assets are to be used for the benefit of the Company. All employees must safeguard the assets of the Company. Protection of Company assets is vital. Company assets encompass both Company funds and property; including trade secrets, proprietary information, intellectual property, and software programs. Loss, the fraudulent or negligent misuse of Company assets, and theft affects the Company's reputation, earnings, and the ultimate cost of our products and services.

COMPANY FUNDS:

Each employee is personally accountable for Company funds over which he or she has control and is responsible to maintain the appropriate documentation regarding the use of these funds.

Any employee spending Company money, or personal money that will be reimbursed, should always be sure that the Company receives appropriate value in return.

COMPANY PROPERTY:

Company assets must only be used for legitimate business purposes. Unauthorized personal possession or use of Company assets is prohibited.

Company property should not be used for personal benefit. Neither should it be sold, loaned, given away, or otherwise disposed of, regardless of condition or value, except with proper authorization.

Excessive or inappropriate personal use of the Company's telephone network, electronic mail (e-mail), or Internet access is prohibited.

Employees may not make unauthorized copies of computer software programs or use personal software on the Company's computer equipment. Employees can not create or load unauthorized software onto Company-owned personal computers (PCs), workstations, or other computer systems. These unauthorized actions could cause the destruction of information or other systems or technical problems. In addition, reproducing software without authorization (backup copies

are usually permitted by the license agreement) violates U.S. copyright law, and can subject both the Company and any employee making such copies to serious legal consequences.

The use of any funds or other Company assets, or the providing of services for any purpose that is unlawful under any federal, state, or local law, is strictly prohibited.

POLICY REFERENCES:

- *Bulletin Boards - Policy No. 2000.050*
- *Capital Asset Acquisition - Policy No. 2000.070*
- *Capital Asset Disposal - Policy No. 2000.080*
- *Check Requests - Policy No. 2000.100*
- *Corporate Authorization Policy - Policy No. 2001.010*
- *Country and Business Club Memberships - Policy No. 2003.003*
- *Electronic Communications - Policy No. 2000.160*
- *E-Mail - Policy No. 2000.170*
- *Expense Reimbursement - Policy No. 2000.230*
- *Expense Request Policy - Policy No. 2003.013*
- *Internet Policy - Policy No. 2000.330*
- *Minicomputer/Microcomputer Standards and Acquisition Process - Policy No. 2000.460*
- *Personal Phone Calls / Cellular Phones / Beepers - Policy No. 2000.560*
- *Purchasing - Policy No. 2000.570*
- *Solicitation - Policy No. 2000.670*

FRAUD AND ABUSE

It is Company policy to thoroughly investigate and resolve all fraudulent or abusive activities and report such activities to the appropriate regulatory agency(s) as required.

All employees are prohibited from knowingly participating in any fraudulent or abusive activities. If you become aware of or suspect fraudulent or abusive activities, it is your responsibility to report the activities. Refer to the "Reporting Violations" section of this Code.

ACCOUNTING POLICY AND FINANCIAL REPORTING

The Company shall conform to generally accepted accounting principles (GAAP) and/or statutory accounting principles (SAP) as appropriate, as well as to all applicable laws and regulations. All transactions must be executed in accordance with management's general or specific authorization, and must be accurately documented and accounted for, in appropriate detail. All entries to the accounting records of the Company must be based on applicable supporting documentation. Periodic reconciliation of actual assets to recorded assets should be completed.

The Company's Chief Financial Officer (CFO) is the principal accounting officer of the Company and is responsible for establishing and maintaining accounting policy, internal control standards, and the requirements for financial reporting to Company management and outsiders.

All Company funds should be retained in bank accounts in the name of the Company, or the appropriate subsidiary. All payments shall be made by Company check, wire transfer, or by other procedures approved by the CFO. Access to Company assets may be permitted only in accordance with management's general or specific authorization.

All accounting policies, as well as requirements established by the CFO, shall be adopted by all areas of the Company unless prior approval for deviation is obtained.

Employees of the Company shall not make any false, misleading, or purposefully inaccurate oral or written statement to any accountant or auditor employed by the Company, or to any external auditor in connection with:

- Any audit or examination of the Company's financial records;
- The preparation of any report or filing; or
- Any review of the Company's internal control structure.

POLICY REFERENCES:

- *Capital Asset Acquisition - Policy No. 2000.070*
- *Capital Asset Disposal - Policy No. 2000.080*
- *Check Requests - Policy No. 2000.100*
- *Corporate Authorization Policy - Policy No. 2001.010*
- *Country and Business Club Memberships - Policy No. 2003.003*
- *Expense Reimbursement - Policy No. 2000.230*
- *General Ledger Account Reconciliation - Policy No. 2002.009*
- *Minicomputer/Microcomputer Standards and Acquisition Process - Policy No. 2000.460*
- *Purchasing - Policy No. 2000.570*

PROPRIETARY AND CONFIDENTIAL INFORMATION

Confidential information is a vital business asset and should not be disclosed to anyone, internally or externally, other than those with a legitimate business need for this information.

Each employee agrees not to disclose or use at any time, either during or after termination of employment, proprietary and confidential information acquired or developed during the course of employment with the Company.

Employee and member information/records are confidential. Conversations, written communications, and electronic communications, both internal and external, concerning employee and member information must be in compliance with all federal (e.g., HIPAA) and state laws and regulations.

Much of the information developed within the Company is proprietary; it is owned by the Company. It is a valuable business asset representing the efforts of many Company employees, and must be protected. Proprietary information includes technical, financial, marketing, medical,

and other business information. Unauthorized disclosure could decrease its value to the Company and give unfair advantage to others.

The Company takes reasonable steps and measures to safeguard the confidentiality and integrity of information within our information systems through the use of passwords, security codes, etc. Employees must maintain the confidentiality of their passwords and security codes in order to protect and maintain the confidentiality of member health information.

Employees of the Company shall sign a Statement of Confidentiality at the time of hire as a condition of employment.

POLICY REFERENCES:

- *Confidentiality - Policy No. 2000.110*
- *Confidentiality in the Disposal of Member Records - Policy No. A2001.002*
- *Confidentiality of Member Information - Policy No. A2002.002*
- *Data Creation, Access and Security - Policy No. 2003.001*
- *Disclosure of Protected Health Information - Policy No. 2002.005*
- *Electronic Communications - Policy No. 2000.160*
- *E-Mail - Policy No. 2000.170*
- *Intercepting Private Communications - Policy No. 2000.320*
- *Internet - Policy No. 2000.330*
- *Responsibilities for Confidentiality Compliance - Policy No. 2002.006*
- *Security Logon Request / Removal - Policy No. 2004.008*

CONFLICT OF INTEREST

Employees must avoid situations where their personal interests could conflict or appear to conflict with the best interests of the Company or its policyholders. A conflict of interest may arise when an individual's position or responsibilities with the Company present any opportunity for personal gain apart from the normal compensation provided through employment. To help avoid conflicts (or the appearance of a conflict), no employee shall have any unreported and/or unapproved business, investment, financial or other interest of any kind with an outside organization that might possibly conflict, or appear to conflict with the employee's ability to act in the best interest of the Company. Even if a conflict does not in fact exist, the appearance of a conflict to others can be damaging to the reputation of the Company and the employee.

While it is impossible to list every circumstance giving rise to an actual or potential conflict of interest, the following examples are of situations or relationships that could create a conflict of interest or a potential conflict when you or a member of your immediate family:

- Accepts or solicits a gift, favor, or service from an individual, business, or other party involved, or potentially involved, in a contract or transaction with the Company;

- Accepts, agrees to accept, or solicits money or other tangible or intangible benefit in exchange for the exercise of official powers or the performance of official responsibilities;
- Accepts employment or compensation or engages in any business or professional activity that is competitive with that of the Company or might require disclosure of Company confidential information;
- Accepts other employment or compensation that could reasonably be expected to impair the individual's independence of judgment in the performance of official duties; or
- Makes personal investments or engages in any conduct or activity that results in an improper gain or advantage to either you or a third party that is contrary to the Company's interests.

Employees of the Company are responsible for compliance with the Company's Conflict of Interest Policy and are responsible to disclose to his or her immediate supervisor and the Compliance Officer any situation that may constitute a conflict of interest when it occurs.

POLICY REFERENCES:

- *Conflict of Interest - Policy No. 2000.120*
- *Employment of Relatives - Policy No. 2000.210*
- *Other Employment - Policy No. 2000.500*
- *Voting and Political Activities - Policy No. 2000.750*

EMPLOYEE RELATIONSHIPS

The Company recognizes that its continued success depends on the development and utilization of the full range of human resources.

It is the continuing policy of the Company to afford equal employment opportunity to qualified individuals regardless of his or her race, color, religion, sex, national origin, citizenship, age, physical or mental handicap or disability, and disabled veterans of the Vietnam era or other protected characteristics, and to conform to applicable laws and regulations.

This policy of equal opportunity covers all aspects of the employment relationship, including application and initial employment, promotion and transfer, selection for training opportunities, social and recreational programs, wage and salary administration, and the application of service, retirement, seniority, and employee benefit plan policies.

All external candidates will be subject to criminal background checks, reference checks, and drug screening. Depending on position requirements, internal candidates may be subject to background and reference checks.

It is the Company's established policy to:

- Treat employees with consideration, understanding and respect; encourage employees to discuss any job-related problems with his or her supervisors; and make a concerted effort to resolve differences promptly;
- Provide educational and training opportunities related to the Company's requirements; and,
- Foster high performance by maintaining open communication on matters of common concern with all employees to the fullest extent possible.

POLICY AND OTHER REFERENCES:

- *Americans with Disabilities Act - Policy No. 2000.020*
- *Bridging of Service - Policy No. 2000.040*
- *Corporate HIPAA Training Policy - Policy No. 2003.011*
- *Corrective Counseling - Policy No. 2000.130*
- *Displaced Employees - Policy No. 2000.140*
- *Employee Assessment - Policy No. 2000.180*
- *Employee Assistance Program - Policy No. 2000.210*
- *Employment of Relatives - Policy No. 2000.210*
- *Equal Employment Opportunity - Policy No. 2000.220*
- *Family and Medical Leave - Policy No. 2000.240*
- *Filling Open Positions - Policy No. 2004.001*
- *Flextime - Policy No. 2000.250*
- *Initial Review Period - Policy No. 2000.310*
- *Open Door - Policy No. 2000.480*
- *References/Employment Verification - Policy No. 2000.580*
- *Salary Administration - Policy No. 2000.620*
- *Tuition Assistance - Policy No. 2000.730*
- *Employee Guide (Revised 02/2005)*

GIFTS, GRATUITIES, AND IMPROPER PAYMENTS

The Company and its employees will maintain the highest standard of integrity and objectivity in dealing with vendors and service providers.

It is never permissible to give or accept a gift in cash or cash equivalents such as gift certificates, gift cards, coupons, and vouchers.

Employees are prohibited from accepting or giving gifts, gratuities or favors beyond common business courtesies of nominal value not to exceed \$150. Gifts, gratuities or favors that exceed this amount may be accepted or given only with the written approval of an Executive Vice

President, the CFO, or the CEO. Acceptance or giving of such gifts should be on a periodic and/or non-routine basis.

Subject to state and federal laws and regulations, gifts and items of substantial value should never be accepted from or offered to government employees.

No bribes, kickbacks, or other improper payments or similar promises can be made, directly or indirectly, by or on behalf of the Company. Expressly prohibited are payments by or on behalf of the Company with the intention or understanding that a part of such payment is to be used for any purpose other than that described by the document(s) supporting the payment.

POLICY REFERENCES:

- *Conflict of Interest - Policy No. 2000.120*

- *Expense Reimbursement - Policy No. 2000.230*

FAIR COMPETITION AND ANTITRUST

It is the policy of the Company to ensure fair, lawful, and ethical competition based on the merits of its products, services, and people.

All employees are prohibited from engaging in antitrust practices, including but not limited to, bid-rigging, price-fixing, tie-in sales that condition the sale of one product on the involuntary purchase of another, market allocation agreements with competitors, and/or contracts that require customers or suppliers to deal with only one specific customer or supplier.

Employees must promote the Company's products and services through fair and accurate comparisons with the Company's competition. Employees must avoid all contracts, agreements and understandings that unlawfully reduce or eliminate competition or the production or sale of products or services.

FALSE CLAIMS ACT AND GOVERNMENT CONTRACT COMPLIANCE

The Company requires compliance with the False Claims Act and the requirements of all Government Contracts.

Employees must never attempt to persuade any Company employee or any other person to provide false or misleading information to any governmental official or agency.

Employees must never destroy or alter any Company documents or records in anticipation of or following a request for documents or records by a government/regulatory agency or court.

All business records and communications should be clear, truthful, and accurate. Business records and communications often become public through litigation, government investigations, or the news media. Avoid exaggeration, colorful or inappropriate language, guesswork, legal conclusions, and derogatory remarks or characterizations of people and companies.

All employees are prohibited from knowingly participating in the filing of any false claims with any governmental agency, and from knowingly violating any section or sections of any government contract requirements.

POLICY REFERENCE:

- Compliance with Laws - Policy No. 2003.004

NEWS MEDIA GUIDELINES

Inquiries by the news media about Company matters are to be coordinated through the Media Relations Department. Designated spokespeople are the only employees authorized to speak on behalf of the Company.

Employees must always notify Media Relations when contacted by the media when the subject matter is in any way related to the Company, including Company employment.

Employees must never provide comment to the media about Company business unless the inquiry is coordinated by Media Relations.

POLICY REFERENCE:

-News Media Guidelines - Policy No. 2002.001

MEDICAL MUTUAL OF OHIO VENDOR EXPECTATIONS

Medical Mutual of Ohio and its subsidiaries expect its vendors, contractors, and business partners to:

- Act in a law abiding and ethical manner.
- Take reasonable steps and measures to safeguard Medical Mutual's proprietary and/or confidential information.
- Maintain confidentiality and not share passwords to MMO's systems.
- Afford equal employment opportunities to qualified individuals regardless of his or her race, color, religion, sex, national origin, citizenship, age, physical or mental handicap or disability, veteran status or other protected characteristics, and to conform to applicable laws and regulations.
- Not accept or offer bribes, kickbacks, or other improper payments or similar promises, directly or indirectly, by or on behalf of MMO.
- Strive for fair, lawful, and ethical competition based on the merits of its products, services, and people.

- Prohibit engaging in antitrust practices, including but not limited to, bid-rigging, price-fixing, tie-in sales that condition the sale of one product on the involuntary purchase of another, market allocation agreements with competitors, and/or contracts that require customers or suppliers to deal with only one specific customer or supplier.
- Fully comply with all contracts and regulatory requirements.
- Ensure that all reporting, business records, and communications to, and on behalf of MMO are accurate and timely.
- Ensure that employees do not provide false or misleading information to any governmental official or agency.
- Ensure that no relevant documents or records are destroyed or altered in anticipation of or following a request for documents or records by a government/regulatory agency or court.

The MMO Compliance Helpline and Post Office Box are available to all vendors, contractors, and business partners as a means to gain additional information or to report violations or suspected violations with respect to the vendor relationship between MMO and its subsidiaries and the vendor. All inquiries received are confidential. All conversations are considered confidential and not recorded. All inquiries, whether via phone or post office box, can be made without fear of retaliation.

Investigational information may be reported to law enforcement or regulatory agencies as appropriate.

OBTAINING ADDITIONAL INFORMATION OR REPORTING VIOLATIONS

COMPLIANCE HELPLINE
216-687-7722
1-800-762-8130

COMPLIANCE POST OFFICE BOX
MEDICAL MUTUAL OF OHIO
P.O. BOX 94814
CLEVELAND, OHIO 44101-4814

COMPLIANCE OFFICE
MAIL ZONE 01-6B-1210

Name

Date

ACKNOWLEDGEMENT OF CODE OF CONDUCT

I acknowledge that I have read and understand the Company's Code of Conduct and agree to conduct myself in accordance with the Code.

I understand I have an obligation to report any violation or suspected violation of the Code of Conduct.

I understand that I am required, as a condition of my ongoing employment, to truthfully answer the following questions. This information is necessary to comply with requirements of law. (*"Yes" responses may lead to disciplinary action including, but not limited to termination.*)

1. Have you ever been convicted or are you currently charged with a felony involving fraud, theft, embezzlement, dishonesty, or breach of trust? Yes No

2. Have you ever been convicted or are you currently charged with insurance fraud? Yes No

Employee Signature

Cost Center

Please Print Name

Date

This Acknowledgement must be returned to:

**COMPLIANCE OFFICER
MAIL ZONE 01-6B-1210**

FREQUENTLY ASKED QUESTIONS

ABOUT CODE OF CONDUCT

Q: I believe I have been the subject of harassment. If I report it, will I lose my job or have to put up with any discriminatory treatment?

A: The Code emphasizes that harassment or retaliation for reporting harassment will not be tolerated.

Q: I'm worried about a co-worker who I think is using drugs. If I report this, will she lose her job?

A: The Company is concerned about the health and safety of all employees. Accordingly, our initial response would be to offer help to the employee, not to terminate employment. If you are concerned that another employee is working under the influence of drugs or alcohol, talk to your manager or Human Resources.

Q: If one of our customers offers me tickets to a concert or any other event, can I accept?

A: The tickets are considered a gift if the customer gives them to you. If their value is more than \$150, you must get approval from an EVP, the CFO, or the CEO of the Company.

Q: I have a personal business that has a web site on the Internet. I've been using the Company computer for e-mail and Internet access, but only on my lunch break or after work. Is this OK?

A: No. Use of any Company resources for outside business interests is not acceptable.

Q: I sell magazine subscriptions for a little extra income. Can I set up a display near my desk?

A: No. The Company does not permit you to conduct personal business during normal business hours or in work areas.

Q: Is there a problem with several of us who have been in the industry a long time getting together occasionally to catch up on things and exchange gossip?

A: Not if you keep your conversations away from areas where you could appear to be colluding, fixing prices, dividing customers, sharing proprietary information, or engaging in other anti-competitive practices.

Q: At a recent business conference, a competitor presented some current market research. Is it OK to use it in my work?

A: Yes. Presentations at conferences and published articles are public information and may be used.

Q: While at a local restaurant, I overheard a broker describing a competitor's new operating plan. Can I share this with my coworkers?

A: Yes. Information overheard in a public setting may be shared.

ABOUT CODE OF CONDUCT (Continued)

Q: I plan on running for public office in my city. Do I need to tell someone at the Company?

A: You should discuss this with your manager to make sure that your activities do not interfere with your job performance or that your views are not misinterpreted as those of the Company.

Q: I do consulting for a non-competing company. When I am not too busy, I type my consulting reports at work because I do not have a computer at home. Is that allowed?

A: No, this is not allowed. You are expected to devote your attention to MMO business during work hours and not use company assets for personal gain.

Q: A friend who works for a competitor is negotiating rates with a provider. The provider claims that MMO pays it more than her health plan does. Your friend calls you to verify how much MMO pays that provider. Is it OK for you to tell her how much MMO pays?

A: No. This might create the impression that MMO and the competitor were “fixing” reimbursement rates.

Q: My child’s friend at school is rumored to have a contagious disease, which I fear my child may contract. I have access to the claims system for my job. Can I look up my child’s friend’s medical information to see if she has been treated for a contagious disease?

A: No. You have not legitimate business purpose for accessing the member information. It would be an inappropriate use of member information.

ABOUT REPORTING MISCONDUCT

Q: Will my manager know I contacted you?

A: Not unless your concern is a one-to-one issue with that manager.

Q: If you don't know my name, how will I get an answer to my question?

A: All contacts are assigned case numbers. If you wish to remain anonymous, you will receive a number to reference when you call for an update.

Q: Is calling the Compliance Helpline the only way I can discuss my concern?

A: No. You can meet with or send information via confidential interoffice mail, U.S. mail or e-mail directly to the Compliance Officer.

Q: Will any information be put in my personnel file?

A: No information about your good faith questions or concerns will be put in your personnel file.

ABOUT REPORTING MISCONDUCT (Continued)

Q: How will I know anything happened?

A: The Compliance Officer initiates investigations working with Human Resources, the General Counsel, and the Corporate Audit Department. When you call to follow up on your question or concern, we will give you an answer, tell you that appropriate action was taken, or tell you that the concern was unsubstantiated.

Q: What will happen if someone deliberately makes a false report in order to get me into trouble?

A: All investigations are handled professional and objectively. Intentionally making false accusations is a serious violation and may lead to disciplinary action, up to and including termination of employment

COMPLIANCE HELPLINE

216-687-7722

1-800-762-8130

COMPLIANCE POST OFFICE BOX

MEDICAL MUTUAL OF OHIO

P.O. BOX 94814

CLEVELAND, OHIO 44101-4814

COMPLIANCE OFFICE

MAIL ZONE 01-6B-1210