



Living our values

# The Alberta Blue Cross Code of Conduct



# Introduction

At Alberta Blue Cross, our mission is to provide health and wellness plans, programs and services on a viable, not-for-profit basis for the financial protection and well-being of our communities.

Our ability to fulfil our mission truly depends on each of us as individuals—and the actions, choices and decisions we make on a daily basis as employees of Alberta Blue Cross.

Back in 1998, the Alberta Blue Cross Board of Directors asked Alberta Blue Cross to develop a formal Code of Ethics. In the belief that our Code of Ethics should be based on the values of our employees, we began to develop this code through sessions with approximately 400 employees, including front-line employees, team managers and managers. Through these sessions, we were able to identify five key shared values.

These values stood for what we believe in and guided our corporate culture. However, times have changed and our company has evolved as well. We asked our employees to help us refresh our values in 2018, so they reflect who we are today.

These four new values—integrity and trust; wellness and flexibility; customer committed; and empowering potential— exist together today to support us and ensure we are fulfilled as employees. These values reflect our high concern for both people and productivity, and give us a common sense of direction as we pursue our mission.

These values also establish common standards for us in terms of ethical behaviour. For example, by acting with integrity we do not deceive a customer or engage in unlawful activities while at work. By promoting wellness, we inspire a healthy culture of support. By focusing on the customer, we remain passionate about delivering exceptional experiences. And we empower potential by continuously learning and contributing to a culture of innovation.

Our standards are high. But it is through living up to these standards that we have made Alberta Blue Cross Alberta's leading health and dental benefits carrier—and a truly great place to work. It is by maintaining these standards in the future that we will ensure our continued success as an organization.

Our challenge, as individuals, as a team and as a company, is to strive to live our values each day as we work together to achieve our mission. To help us meet this challenge, we have revisited the underlying guiding behaviours that support our values and established a *Code of Conduct* that reinforces our responsibilities as members of a values-based organization. This *Code of Conduct* marks the continued evolution of our shared values and strengthens our commitment to living our values on a day-to-day basis. The *Code of Conduct* applies to all employees of our organization, including front-line employees, managers and executive.

I encourage you to become familiar with this *Code of Conduct* and talk with your manager or contact your Human Resources representative if you have any questions about our values or *Code of Conduct*.

Yours truly,



**Mark Z. Komlenic**  
President and CEO



# Guiding principles

The Alberta Blue Cross Code of Conduct is firmly rooted in our shared values: integrity and trust; wellness and flexibility; customer committed; and empowering potential.

To develop these values, we listened to feedback from Alberta Blue Cross employees. These values identify the shared principles that together give us a common direction. Our *Code of Conduct* draws upon these values, establishing standards for our day-to-day actions, choices and decisions.

## **Our people will deliver our vision**

One of the fundamentals of high performance workplaces is the belief that people will deliver on the vision.

We have a highly motivated workforce that believes in Alberta Blue Cross and its products and services. Our employees take pride in being engaged and accountable. By having a *Code of Conduct* to support our values, we will be able to enhance the commitment and performance of our workforce.

## **Why are values important to Alberta Blue Cross?**

In the health-care industry, there are significant and continuous environmental forces at work: the influences of Alberta's and Canada's economies, changing legislation, new technologies and alterations in the nature of competition. Shared values that promote innovation and flexibility in a climate of change help us respond to the changing demands of our customers. We know that employees of values-based organizations are motivated to acquire new skills, exhibit increased productivity, have heightened morale and are committed and engaged. A *Code of Conduct* reinforces the importance of our shared values.



### **Integrity and trust**

We are respectful, ethical, honest and inclusive in all that we do.

### **Wellness and flexibility**

We promote and inspire a healthy culture of support, adaptability and compassion across our workplace and our communities.

### **Customer committed**

We are accountable and committed to our customers and passionate in the delivery of an exceptional customer experience.

### **Empowering potential**

We support learning and growth while fostering a diverse environment that cultivates collaboration and innovation.

# Alberta Blue Cross Code of Conduct

As an extension of our values, the *Code of Conduct* requires us to act according to the described behaviours. These behaviours, when applied to day-to-day tasks, interactions and decisions, reinforce our shared values.

## I. Integrity and trust

At Alberta Blue Cross, we

- (a) comply with all laws and regulations that apply to the business of Alberta Blue Cross.
- (b) work and conduct ourselves according to the highest ethical standards.
- (c) act according to the Code of Ethics of any professional organization to which we belong.
- (d) act according to all Alberta Blue Cross workplace policies, procedures and guidelines.
- (e) comply with all digital security measures including the following:
  - **passwords**—as system passwords are one of the most important security features on our computer workstations, we keep passwords secret, change them regularly, do not reuse passwords and respect the privacy and confidentiality of the passwords of others.
  - **software programs and other computer products**—we only use licensed software on our computer workstations, which is provided and installed by authorized technical personnel in compliance with applicable license agreements or other corporate requirements. This includes, but is not limited to, screensaver and messaging software (such as Skype). We understand all software, including software downloaded from the Internet, must be approved by the Service Desk, purchased through the proper channels and installed by authorized technical employees. We do not use unlicensed (pirated) software in any situation.
  - **external computer files and documents**—if you have to transfer any files (personal or work-related) to or from your workstation or home computer, use only an Alberta Blue Cross-issued device—such as an encrypted USB memory stick. No personally-owned device should be used to transport data or files for work or personal purposes to or from Alberta Blue Cross workstations. If you are unsure of the content of the removable media, please bring it to the Service Desk to be virus-scanned before using it on your workstation.
  - **email use**—we abide by Alberta Blue Cross policies and procedures relating to the use of the corporate email system. We do not distribute to others any un-addressed or “junk” mail (including chain letters) and permanently delete it from our computers. We use discretion in disclosing our Alberta Blue Cross email addresses and use all required security measures for sending proprietary information via email.
  - **internet use (browsing)**—we abide by Alberta Blue Cross policies and procedures relating to the use of corporate Internet services and do not access or download information from any website that is inappropriate or creates a security exposure to Alberta Blue Cross.
  - **security measures**—we understand and fully comply with all necessary policies and procedures to maintain the integrity of systems and information security required by, and/or put in place by Alberta Blue Cross.
- (f) recognize that mutual trust is the basis for dealings between one another, our customers and other external parties.
- (g) do not abuse the trust and confidence that others place in us.
- (h) act with personal and professional integrity in dealings with one another, our customers and other external parties.

- (i) avoid conflict of interest situations where our personal interests may conflict or reasonably appear to conflict with the interests of Alberta Blue Cross or our customers. The *Conflict of Interest Guidelines* are attached as Appendix “A”.
- (j) treat co-workers and expect to be treated by co-workers with mutual respect and dignity.
- (k) take pride in Alberta Blue Cross, in each other and in our work.
- (l) respect diversity of cultures, beliefs and lifestyles.
- (m) treat everyone, including health-care providers, stakeholders and customers, with courtesy, respect and honesty and deal with them in a timely and fair manner.
- (n) acknowledge our position as representatives of Alberta Blue Cross and accept our responsibility to project a positive image in the communities in which we operate.
- (o) are encouraged to participate—if and when appropriate—in community activities and voluntary organizations with pride and enthusiasm.
- (p) respect confidentiality and privacy and only access or use information that has a business reason behind it.
- (q) meet Alberta Blue Cross expectations regarding hours of work, attendance and performance.
- (r) are committed to safeguarding the collection and retention of personal information and to safeguarding the integrity, privacy and confidentiality of such personal information, and are aware that such information is for Alberta Blue Cross use only.

## **II. Wellness and flexibility**

At Alberta Blue Cross, we

- (a) are committed to providing a safe, secure, flexible and healthy work environment.
- (b) abide by all Alberta Blue Cross guidelines and policies concerning workplace safety and security.
- (c) are concerned about our own and co-workers’ health and well-being.

## **III. Customer committed**

At Alberta Blue Cross, we

- (a) strive to meet and exceed the needs and expectations of our customers, both internally and externally.
- (b) are accountable and committed to delivering exceptional customer experiences.

## **IV. Empowering potential**

At Alberta Blue Cross, we

- (a) are empowered and organized to work to our full potential.
- (b) continuously improve our knowledge and capabilities in order to grow personally and professionally and to add value to our organization.
- (c) focus on and look for ways to innovate and challenge the status quo.
- (d) recognize and value collaboration, teamwork and the sharing of knowledge and experiences with co-workers.
- (e) communicate openly with each other through the sharing of opinions and ideas and through positive and constructive feedback.

## Questions regarding the Code of Conduct

If you have any questions about the *Alberta Blue Cross Code of Conduct* or the *Conflict of Interest Guidelines*, or would like clarification of any aspect of either, please talk with your manager or contact Human Resources.

### Violations of the Code of Conduct

- 1) Anyone who violates the *Alberta Blue Cross Code of Conduct* or the *Conflict of Interest Guidelines* may be subject to disciplinary action ranging from reprimand to dismissal depending upon the degree and severity of the violation.
- 2) Everyone is expected to report perceived or alleged fraudulent or irregular activity, including non-compliance with legislation, corporate policies, the *Code of Conduct* or the *Conflict of Interest Guidelines*. The *Alberta Blue Cross Safe Disclosure Policy* and supporting guidelines outline the internal processes that are in place to report good-faith concerns.

In situations where an individual does not feel comfortable reporting in person, this process includes a third-party, independent reporting mechanism as a way to report concerns anonymously and confidentially. Individuals can report through ConfidenceLine at 1-866-441-8477 or [albertabluecross.confidenceline.net](http://albertabluecross.confidenceline.net). More information on this process can be found at [intrablue/Policies/Policies.aspx?id=2147502664](http://intrablue/Policies/Policies.aspx?id=2147502664).

# Alberta Blue Cross

## Employee Conflict of Interest guidelines

The purpose of these guidelines is to establish a standard of conduct for all Alberta Blue Cross employees that fosters external and internal confidence in the honesty, integrity, objectivity and impartiality of the decision making processes of Alberta Blue Cross.

It is the responsibility of all Alberta Blue Cross employees to immediately report any potential, perceived or real irregular activities or conflicts of interest through the processes outlined in the *Alberta Blue Cross Safe Disclosure Policy*. Broadly speaking, a conflict of interest is a situation or circumstance where the personal or private affairs and interests of an employee may reasonably be expected to or perceived to firstly, influence the decisions the employee is required to make on behalf of Alberta Blue Cross or secondly, conflict with the best interests of Alberta Blue Cross.

For the purposes of conflict of interest, when looking at personal or private affairs and interests of an employee, an employee should consider his or her immediate and extended family and any business organizations in which the employee or his or her immediate and extended family has a material financial interest or investment.

If an employee has any doubt, concern or question regarding conflict of interest or these guidelines, the employee should contact the vice president of People, Wellness and Innovation.

Accordingly, all Alberta Blue Cross employees agree to

1. avoid activities (including additional employment) that may or do conflict with their responsibilities and obligations to Alberta Blue Cross. Without limitation, all employees agree to avoid
  - (a) significant financial activities or interests and business deals or relationships, with or without immediate or extended family involvement, that compete directly or indirectly with Alberta Blue Cross businesses;
  - (b) activities that may or do have a negative or adverse impact upon the business reputation of Alberta Blue Cross and its status in the communities in which it operates; and
  - (c) activities that may or do adversely affect their ability to make corporate decisions, take corporate actions or perform their jobs.
2. use Alberta Blue Cross money or assets only for the benefit of Alberta Blue Cross and not for their personal benefit or gain or that of others.
3. not create or participate in any action or process where Alberta Blue Cross money or assets are not properly recorded or used.
4. not conduct or participate in any false, fraudulent or improper financing or accounting activities or processes.
5. not process health, dental, life or disability claims concerning services or products provided to themselves, their relatives, fellow employees or close friends. Such claims must be processed by employees appointed by management.
6. not use any Alberta Blue Cross property, facilities or resources for political activities, unless directly authorized by the president of Alberta Blue Cross to do so. Employees must not include any political contribution in an expense account reimbursement claim and must not charge any political contribution to an Alberta Blue Cross credit account, without written authorization of the president.
7. not accept or benefit from, directly or indirectly, rebates, kickbacks, discounts or other financial credits or advantages arising from the sale or supply of goods or services to Alberta Blue Cross. However, all employees may receive or accept unsolicited, infrequent and non-monetary gifts having a nominal value (including entertainment-related items) from any person, corporation or other organization when doing business with Alberta Blue Cross.
8. ensure that all agreements with sales representatives, suppliers, agents and consultants are approved by the authorized or designated signing authority and that the services or products to be performed or supplied and the calculation of the cost of those services or products are accurately recorded in writing.

