



SUPPLIER CODE OF CONDUCT

1. Background

As Alberta's largest benefits carrier, ABC Benefits Corporation o/a Alberta Blue Cross provides supplementary health and dental benefits to meet the needs of over 1.6 million Albertans. We offer benefit plans for individuals and families, seniors, and large and small employers.

Our mission

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.

We cover just about every type of health benefit, including prescription drugs, dental, vision care, preferred hospital accommodation, emergency medical travel, ambulance, home nursing and chiropractor, as well as life insurance and short and long term disability coverage for group plan members.

As a best practices organization, Alberta Blue Cross is a three-time recipient of the Premier's Award of Distinction for Healthy Workplaces and is ranked as one of Alberta's Top 65 Employers.

Not-for-profit

Alberta-based and Alberta-grown, we are an independent, not-for-profit organization. Because we're not-for-profit, we have no built-in profit margins. Any financial surplus we generate is reinvested for the current and future benefit of our customers, meaning we can deliver outstanding value on our complete line of superior products and services. Alberta Blue Cross currently employs around 1100 employees and strongly promotes and practices our values which include integrity and trust, wellness and flexibility, customer committed, and empowering potential.

Strong link with your community

With our head office in Edmonton, Alberta, and five branch offices across the province, we specialize in serving the Alberta market. We're just a phone call away, or you can visit us in person at our Edmonton, Calgary, Lethbridge, Medicine Hat, Red Deer and Grande Prairie locations.

National and international connections

We are also connected nationally and internationally to other not-for-profit plans. Our strong Canada-wide connections put us in the right position to serve national organizations.

We're licensed by the Canadian Association of Blue Cross Plans which means we meet their standards and submit to annual reviews. We also have a working relationship with the American Blue Cross and Blue Shield Association and their member companies. In 2016, Leger ranked Blue Cross as Canada's #1 health benefits provider in the insurance sector and it is also one of the top 100 brands in Canada. These rankings are based on corporate citizenship, quality, honesty and transparency.

World-wide, we belong to the International Federation of Health Plans, which promotes non-profit health plans and has members in Canada, the United States, the United Kingdom, Europe, Asia, Africa and Australia.

2. Key Fundamentals

Alberta Blue Cross set forth standards as laid out in this Code of Conduct. Suppliers are required to meet these standards at a minimum. These standards apply to individuals and organizations “Suppliers” doing business with ABCs that provides goods, services and personnel either directly or through sub-contracting.

The purpose of this Supplier Code of Conduct is to ensure that all Suppliers, irrespective of its location, adhere to a minimum standards of performance pertaining to social responsibility, environmental standards, ethics, human rights, and fair worksite operations.

2.1 Integrity

- ***Compliance with Applicable Laws:*** Suppliers shall ensure that they are operating in compliance with all applicable laws in the jurisdictions by which they operate.
- ***Avoidance of Conflict of Interest:*** Suppliers shall ensure to avoid any potential conflicts of interest when dealing with Alberta Blue Cross. Suppliers must fully and honestly disclose any potential or perceived conflict of interest prior to entering into business with Alberta Blue Cross. Suppliers should not use relationships with existing employees at Alberta Blue Cross to gain an unfair advantage or preferential treatment when doing business with Alberta Blue Cross.
- ***Respect for Human Rights:*** Suppliers of Alberta Blue Cross must not engage in unethical behavior as it relates to human rights as expressed through the Universal Declaration of Human Rights and International Labour Organization.
- ***Employment Practices:*** Suppliers of Alberta Blue Cross must adhere to local employment laws in accordance to the jurisdiction by which they operate. Such practices include providing wages and benefits that meet or exceed the requirements of the local law by which they operate. Working hours and overtime hours must not exceed the legal limits. Suppliers must not engage in using child labour or forced labour in any of their business operations. Suppliers must ensure that they are providing a work environment that is free of harassment and discrimination of any kind and all employees are treated equally and fairly.
- ***Combating Corruption and Bribery:*** Suppliers of Alberta Blue Cross must conduct their business with Alberta Blue Cross in an ethical manner and must not engage in any bribery to any of our employees.
- ***Confidentiality:*** Suppliers must safeguard confidential information of Alberta Blue Cross and not share any information with any third parties. Suppliers must obtain prior consent for any such use or share of confidential information with any third parties.
- ***Privacy:*** Suppliers must abide by all applicable data privacy and data security laws and regulations. Suppliers of Alberta Blue Cross must ensure they store information in a secure location as it relates to privacy and have sufficient policies and procedures in place to ensure

that information is kept protected and secure. Suppliers must immediately notify Alberta Blue Cross in the event that a privacy breach, security breach, or a loss of our information takes place.

- **Management of Information:** Suppliers of Alberta Blue Cross will ensure that any data is stored in a secure location and will be communicated to Alberta Blue Cross on where the data will be stored (for example, cloud). This secure location must be approved by ABC and may not be changed without prior written approval.

2.2 *Workplace Safety & Sustainability*

- **Creating a Safe Workplace:** Alberta Blue Cross expects Suppliers to ensure that offices and facilities are in compliance with the local occupational health and safety standards from which the business operates.
- **Environment:** Alberta Blue Cross expects Suppliers to conduct their business in an environmentally responsible and conscience manner to reduce any negative impact in the environment when possible.
- **Economic:** Alberta Blue Cross expects Suppliers to conduct their business operations in a cost-effective manner while conducting business with Alberta Blue Cross.
- **Social:** Alberta Blue Cross expects Suppliers to consider all of the stakeholders in the local economic community it operates in while conducting business.

2.3 *Working with our Suppliers*

- **Gifts & Entertainment:** Alberta Blue Cross expects Suppliers to restrain from providing gifts and entertainment to employees of Alberta Blue Cross to gain an unfair advantage or preferential treatment.
- **Soliciting Suppliers:** Suppliers of Alberta Blue Cross should not solicit information of other Suppliers of Alberta Blue Cross in an attempt to gain an unfair advantage during any business or transaction with ABC.
- **Communications on Company Information Systems:** Suppliers of Alberta Blue Cross must have written consent from Alberta Blue Cross to reference Alberta Blue Cross or use our logo as their customers online or in any other social media platforms.
- **Mutual Respect:** ABC considers dignity and respect for all as its highest priority. Suppliers are expected to maintain the same by ensuring that their work environment is exclusive of discrimination and harassment nevertheless inclusive of diversity and equality.

3. Compliance and Monitoring

ABC expects all its Suppliers to conform with the Supplier Code of Conduct and ensure to do their utmost to meet at the minimum, all standards specified in the Supplier Code of Conduct. ABC will mutually work with its Suppliers to eliminate any deficiencies as and when required. Suppliers inability for corrective measure to non-conformance with the Supplier Code of Conduct can lead to termination of contract by ABC.

ABC at its own discretion may request Suppliers to provide proof of conformance to all applicable labour, health, safety, environmental and other laws and legislative requirements. Suppliers will be required to provide the most recent and updated relevant documentation for verification.

End of Supplier Code of Conduct