

# INTRODUCTION



As employees and representatives of Delta Dental, we share a responsibility to live our values of Trust, Service, Excellence and Innovation in everything we do. These values inform our Code of Business Conduct, creating an obligation to act responsibly, generate the best outcomes for our clients and prudently manage risk.

Our actions directly influence how our colleagues and customers work with and perceive us, and as members of a regulated company, we must be especially careful to remain in compliance with applicable laws and regulations.

The Ethics Guide was developed to provide guidance on behaviors we are all expected to follow, regardless of business, job function or seniority. It reflects our continued commitment to the standards and values that make us a successful enterprise and a trusted partner.

Thank you for your individual efforts to drive Delta Dental forward. I'm grateful and honored to lead this great organization with you on the team. Delta Dental is built on a foundation of our values; we're only where we are today because of our employees and our passion for them.

Thank you for all that you do to drive our purpose forward by creating smiles, improving health and enhancing lives.

A handwritten signature in black ink that reads "Mike". The signature is written in a cursive, flowing style.

Mike Castro  
Chief Executive Officer

# ETHICS GUIDE

Code of Business Conduct





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**Creating** smiles.  
**Improving** health.  
**Enhancing** lives.

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# OUR VALUES



We **TRUST** each other to be accountable and do the right thing for the people we serve.

At Delta Dental, we expect **EXCELLENCE** in everything we do.

At Delta Dental, we deliver outstanding **SERVICE**, every time.

We encourage **INNOVATION** by giving our employees the freedom to explore and be curious.

This Ethics Guide was crafted with these values in mind and is central to our everyday behaviors. Our values should be embedded in everything we do and inform the way we work.

# ETHICS

“The time is always right to do what is right.”  
– Martin Luther King Jr.

# INTRODUCTION

Delta Dental is committed to the highest ethical standards and personal behavior. We conduct business in a manner designed to maintain and promote the honor associated with the Delta Dental name.

Our team members must refrain from illegal and unethical conduct, and support and follow both the language and the spirit of the law. You should be open and honest in your business relationships with all team members and other professionals retained by Delta Dental.

Honesty requires disclosing all information that is relevant to a given issue. You should avoid the appearance of impropriety in conducting business, which arises if a reasonable person might conclude that the behavior raises ethical questions.



## QUESTION & ANSWER

Watch for these boxes throughout this document. These serve as roadmaps for making ethical decisions. We will lead you through the thought process of making difficult choices and help you anticipate the potential consequences of your actions.



Do ethical  
companies  
perform better?



*“Whatever your view on causation, the correlation is clear: businesses with strong governance practices, better ethics and compliance programs, more committed cultures and a broad engagement with their communities have better business outcomes and higher shareholder returns.”<sup>1</sup>*

1 A Clear Correlation: Ethical Companies Outperform, E.S. Byrne, June 9, 2017,





### How do we ensure we are acting ethically?

In any given situation, we recognize that no set of standards or procedures can substitute for personal integrity, good judgment and common sense. Although expectations may be described in our Business Ethics Policy and this Guide, this decision tree can help you in handling difficult situations.

If you can't comfortably answer "yes" to each of these questions, you should stop and seek advice from your manager, People organization partner or the Department of Risk, Ethics and Compliance.

1. Is it legal?
2. Does it comply with company policy? Does this comply with this Guide?
3. Have I considered the impact to our customers, team members and the company?
4. Would I feel comfortable explaining my actions to my colleagues, manager and family?
5. Could I defend my actions if they appeared in a newspaper or in a social media post?
6. Does it benefit the company as a whole, not just certain individuals?
7. If I'm unclear about something, have I asked the right person for advice?



Who does this  
Guide apply to?

This Guide applies to Delta Dental team members, Board of Directors and business partners. “Team members” includes employees, contractors and temporary staff, regardless of title. “Business partners” includes providers, vendors, brokers, consultants, subcontractors or anyone who performs services on our behalf.

Internal policies and procedures are cited throughout this Guide to provide additional information about internal processes. We expect our business partners to adopt similar policies and to act consistently with the principles established in this Guide.

# RAISING CONCERNS

“Only by speaking out can we create lasting change.”

-DaShanne Stokes



The effectiveness of this Guide is dependent upon our team members complying with its guidelines, the spirit of these guidelines and the individual judgment each team member must make when faced with their own or others' decisions. To be most effective, it is also critically important that team members report any known or suspected violations of this Guide immediately and participate in their resolution. **No one will be subject to retaliation because of a good-faith report of suspected misconduct.**

### Reporting

It's in Delta Dental's best interest to ensure that any reports of non-compliance with this Guide are quickly and properly investigated.

- All reports will be handled in a manner protecting the privacy of the person making the report.
- All reports will be investigated in a timely manner, normally within 30 days of receipt.
- All reports will be investigated by people trained and experienced in conducting investigations.
- Appropriate corrective action in response to substantiated allegations will occur.

Known or suspected violations of any policies associated with this Guide must be reported. For more information, please refer to the Reporting & Investigating Issues on Non-Compliance with the Ethics Guide policy.



There are several reporting options available to you:



**In-Person**

Talk to your manager or a People organization representative via PeopleConnect in **PATH** or by calling (916) 861-1201, option 2.



**Compliance & Ethics Helpline**

Call: (833)DD-REPORT or (833)337-3767

Online: [www.lighthouse-services.com/deltadental](http://www.lighthouse-services.com/deltadental)

Email: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)



**Chief Compliance Officer**

[ComplianceOfficer@delta.org](mailto:ComplianceOfficer@delta.org)



**Write**

Delta Dental of California  
560 Mission Street  
San Francisco, CA 94105



**Questions**

Contact the Department of Risk, Ethics and Compliance with questions:

[DepartmentRiskEthicsandCompliance@delta.org](mailto:DepartmentRiskEthicsandCompliance@delta.org)

Any report should contain the date, name of the submitter (unless anonymous) and a summary of the alleged violation(s).

### Corrective Action

Delta Dental will take appropriate corrective action for violations of this Guide, company policy and/or the law, up to and including termination of employment. Certain violations may also be violations of the law and could lead to individual criminal prosecution, resulting in fines and/or imprisonment. For more information about the company's disciplinary process, refer to the Corrective Action Policy. Any additional questions about this Guide can be addressed directly with the Department of Risk, Ethics and Compliance, the Chief Compliance Officer or your manager.

### QUESTION & ANSWER

#### **Can I report my concern anonymously?**

You can file a report anonymously online at [www.lighthouse-services.com/deltadental](http://www.lighthouse-services.com/deltadental) or by calling (833) DD-REPORT (833-337-3767). The Helpline is administered by a third-party vendor and your report will be confidential and anonymous, if you choose..



### Manager Responsibilities

Managers and supervisors have leadership responsibilities that include creating a culture of high ethical standards and commitment to compliance, maintaining a work environment that encourages team members to raise ethical concerns and promptly addressing those concerns. Managers are responsible for reporting improper conduct. They are expected to escalate concerns, reports and allegations. Failure to properly report issues and concerns may result in corrective action. Managers must never take or permit any retaliatory action against someone for making a good-faith report.

### Non-Retaliation/Whistleblower Protection

You will not be subject to reprisals of any kind for reporting violations. Delta Dental does not tolerate retaliation or intimidation against any team member's good-faith participation in the compliance and ethics program, whether that be reporting potential issues or participating in audits and investigations. Delta Dental will protect team members from retaliation and intimidation. If you believe you or someone you know is experiencing retaliation or reprisal based on issues addressed in this Guide or otherwise, please report it to the Chief Compliance Officer immediately.

For more information, please refer to our Compliance Program Non-Retaliation and Non-Intimidation policy.



### Waiver Provision

This Guide was duly adopted by the Board of Directors after review and recommendation for passage by the Audit Committee. Proposals for amendments to this Guide will follow the same process as for its adoption. This Guide does not explicitly cover all conceivable situations or circumstances; however, the Company reserves the right to apply the parameters outlined in this Guide to situations and circumstances arising which, in its sole discretion, fall within the spirit and intent of the Guide.

### QUESTION & ANSWER

**Is it okay to address an issue on my own in order to keep a coworker from getting in trouble?**

No. If you suspect someone of violating this Guide, you should report it to a manager or via one of the methods listed in this Guide. Reporting concerns helps us learn of different types of misconduct that could occur. If concerns aren't reported, steps can't be taken to prevent misconduct from happening in the future.





# CONFLICTS OF INTEREST

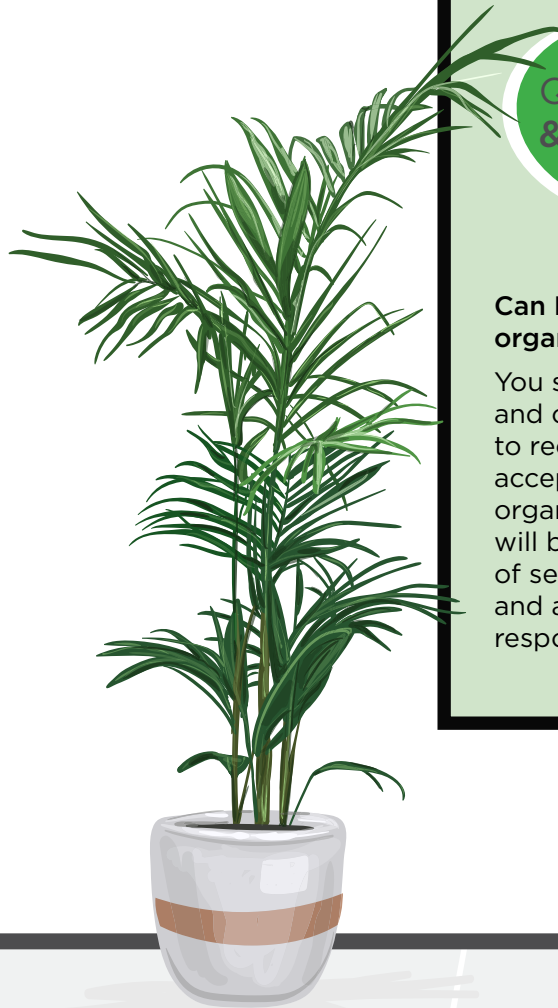
When in doubt, disclose.

Delta Dental considers conflicts of interest a serious matter. Everyone assumes a basic duty of loyalty to our company. Because of this, you should:

- Refrain from activities which may compromise that duty
- Disclose any possible conflicts of interest to Delta Dental

Conflicts of interest arise when a team member is associated with a competitor or other organization. When a team member is associated with a competitor, problems arise because the business goals of the competitor can conflict with those of Delta Dental. In addition, when a team member is associated with a certain organization, such as a regulatory agency or dental society, problems can arise if Delta Dental and the other organization are not legally or ethically permitted to work together toward the same goal — or if they have different or conflicting goals. A conflict of interest also arises when a team member has an independent self-interest that is adverse to Delta Dental for any reason.





QUESTION  
& ANSWER

**Can I sit on the board of another organization?**

You should inform your manager and contact the Legal Department to receive guidance before accepting a position on another organization's Board. Factors that will be considered include the type of services the organization provides and any impact it may have on your responsibilities at Delta Dental.

Because of the potential risks and liabilities that can arise from business circumstances impacted by a conflict of interest, Delta Dental requires all employees, officers and members of the Board of Directors to disclose any possible conflict of interest to your management. The following are conflicts of interest that warrant disclosure to management:

- Being in an employer-employee relationship, or other relationship involving commitment or trust with a competitor organization. Such organizations include, but are not limited to, entities selling or administering dental benefit programs, including brokers and direct competitors to Delta Dental. A conflict would also exist if a team member has any direct financial interest, such as stock ownership, in a competitor organization.
- Being in an employer-employee relationship, or any other relationship involving commitment or trust, with an organization whose interests may bear upon or converge with those of Delta Dental. Examples include affiliation with a regulatory agency, a Delta Dental customer or supplier, or state or local dental societies.

- Entering into any other contract, financial interest or transaction (including but not limited to stock ownership), activity, employment or other relationship involving commitment or trust that would impair in any way the employee's ability to perform the duties of his or her job with Delta Dental in good faith.
- Entering into an employment relationship with related employees and contractors or employees and contractors with relationships that may lead to conflicts of interest. It is best to report any relationship that could be deemed a conflict to your manager.
- Any other situation where the team member is in a position to act contrary to Delta Dental's interests.

Delta Dental considers these situations conflicts of interest not only when they involve team members directly, but also if a team member's spouse, domestic partner, significant other immediate family member or relative, and any person with whom the team member shares living quarters, has any affiliation with a competitor organization as described above. Examples include an affiliation with a Delta Dental customer,

supplier, provider or consultant, a state agency involved in the regulation of insurance or health-related matters, or connection to state or local dental societies.

Examples of companies selling dental insurance that are in daily competition with Delta Dental include Blue Shield/Blue Cross, Aetna, Cigna, MetLife, Prudential, United Concordia, Guardian and Travelers. Affiliations such as these create problems because Delta Dental and the other organization may not be legally or ethically permitted to work together toward a particular goal or to have the appearance of a close-knit relationship.

Conflicts can sometimes arise without the design or agreement of the team member, or organizations not previously in conflict can later become conflicting. Regardless of whether the team member considers two particular loyalties to be in conflict, the very appearance of the conflict is still grounds for concern.

It's your responsibility to report an actual or potential conflict in which you are involved to management. It is better to try to work out a solution with management when a conflict or potential conflict arises, rather than

face possible corrective action for violation of the policy after the fact. In such a situation, the fact that management was not informed may appear purposeful, thus complicating management's decision.

Once a potential conflict has been brought to management's attention, management will investigate the matter. They will determine whether an actual conflict exists, and if so, develop an appropriate solution for the circumstances of the individual case.

# ANTI-CORRUPTION

“Integrity is doing the right thing, even when no one is watching.”  
– C.S. Lewis



Delta Dental believes in using good judgment and integrity in all business activities and decisions and does not tolerate corruption of any kind. Corruption is defined as the offering, giving, receiving or soliciting for personal benefit or business advantage through improper or illegal means.

Corruption may involve payment or the exchange of anything of value and includes the following activities:

- Bribery
- Extortion
- Kickbacks

Corrupt activities not only violate this Ethics Guide; they can also violate criminal and civil anti-bribery and anti-corruption laws. If you become aware of any potential or actual corrupt arrangements, speak up and [report it.](#)



QUESTION  
& ANSWER

**What is a “kickback”?**

A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given or “kicked back” to the purchaser in exchange for making the deal. For example, a kickback might involve a vendor who offers a Delta Dental team member a monthly payment equaling 5% of Delta Dental’s purchases as an incentive to the team member to retain the vendor’s services.



QUESTION  
& ANSWER

**What is “anything of value”?**

“Anything of value” is very broad and can include, but is not limited to goods or services, such as gift cards, event tickets, entertainment, free airfare, travel perks, use of vacation homes, special favors or privileges, donations to designated charities, discounts, free personal services, financial or property loans, or a promise of future employment.





# ACCEPTING GIFTS

If you wouldn't want your acceptance of the gift on the 6 o'clock news, then you probably shouldn't accept it.



You should not directly or indirectly solicit or accept any fee, commission, entertainment, gift, gratuity, property, discount, or loan for yourself, family members or affiliates as compensation for performing duties for Delta Dental, or making or causing Delta Dental to make any business decision.

You may accept reasonable business gifts of nominal value in the ordinary course of employment, not to exceed \$100. You can attend business lunches, dinners and similar outings (e.g., sporting events, golf, theatre, shows, etc.) conducted in the normal course of business which are neither so frequent nor so excessive as to raise any question of impropriety.



**QUESTION  
& ANSWER**

**Can the gift be given openly or in a public setting?**

If not, the gift may not be appropriate.

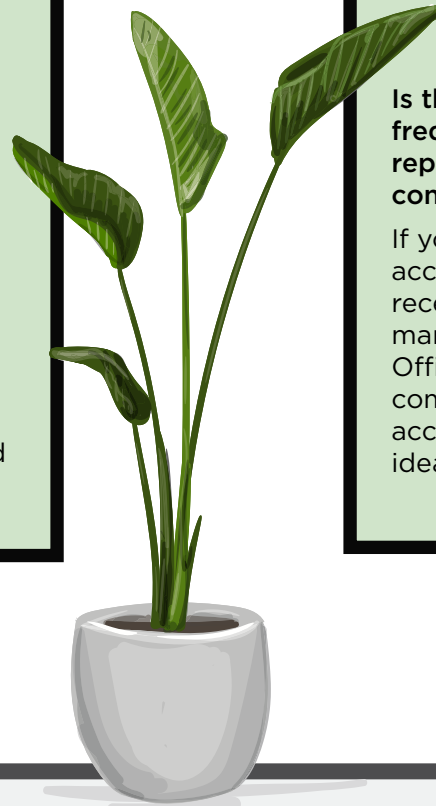
**Do you feel obligated to give the person your business by accepting the gift? Are you expecting something in return from the person you are giving the gift to?**

If so, STOP! There should be no expectations from either party, stated or implied, when gifts are given.

**QUESTION  
& ANSWER**

**Is the gift lavish or is it given frequently? Gifts that are given repeatedly can be perceived as a conflict of interest or bribery.**

If you have any doubt regarding acceptable gift giving and/or receiving, discuss it with your manager or the Chief Compliance Officer. Remember, if you don't feel comfortable, then it is likely that accepting or giving the gift is a bad idea.



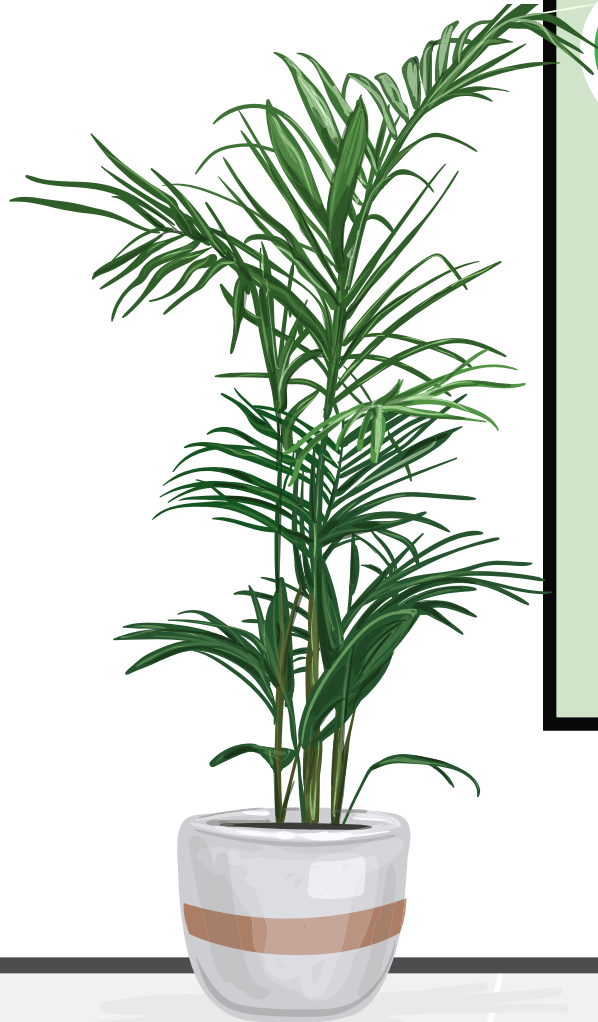
# GIVING GIFTS

Giving and receiving gifts must never be a quid pro quo for any past, present or future act or decision.

Except as authorized by the terms of contractual arrangements with Delta Dental, no fee, commission, property, or any other compensation may be offered or paid directly or indirectly by team members to, for or on behalf of any existing or potential customer, competitor or supplier of Delta Dental for the purpose of influencing any transactions involving or affecting Delta Dental business.

You may provide reasonable business gifts, not to exceed \$100, and may provide business lunches, dinners and similar outings (e.g., sporting events, golf, theatre, shows, etc.) conducted in the normal course of business which are neither so frequent nor so excessive as to raise any question of impropriety. If you are unsure that a gift is appropriate, you should consult with your manager or the Department of Risk, Ethics and Compliance.





QUESTION  
& ANSWER

**Auditors will be on site to review our business area. Can I offer to take them to lunch?**

There are special rules in the U.S. that make it illegal to offer gifts and hospitality to government employees. Even if auditors are not government employees, certain actions can be viewed as bribery. To be safe, consult with the Department of Risk, Ethics and Compliance.

# ANTITRUST AND FAIR COMPETITION

Assume all non-public company information is confidential.



Delta Dental honors free and open competition centered on honesty and equality. Competition laws, also known as antitrust, are designed to promote fair competition for the benefit of consumers. To comply with competition laws, we never do the following:

- Fix prices, premiums or the terms and conditions of the products we sell
- Agree to refuse to do business with customers, providers or other competitors
- Conspire with our competitors by distributing our customers, enrollees or sales territories in an attempt to limit open competition.

If a competitor tries to discuss prices, products, services, or the territories in which we do business, please do not engage. We want to avoid even the appearance that any of our pricing or business decisions are influenced by information exchanged with competitors. Violation of these laws can lead to severe penalties, both civil and criminal, both for team members involved and for Delta Dental. If you believe fair competition laws have been violated, [report it](#) immediately.





QUESTION  
& ANSWER

**An individual who works for one of our competitors approached me and mentioned he is on a committee that is revising the pricing structure for some of their insurance offerings. He wants to know how Delta Dental handles it. What should I say?**

You should make it clear to that person that you cannot engage in that type of discussion. Team members should never discuss pricing with competitors, as this could lead to allegations of price-fixing or other anti-competitive behavior.



# SELECTION AND USE OF THIRD PARTIES/ PROCUREMENT

Is it an arm's length transaction, with fair and reasonable terms?



All business relationships with other companies should be based on their reputation for service, integrity, quality, cost and delivery, and their ability to competitively meet our business needs. In some cases, you may have a personal relationship with a vendor or consultant.

Such relationships have the potential to create a conflict of interest. For example, you might have a family member who works for one of our vendors, or your former employer might be one of several companies under consideration to become a consultant for Delta Dental. In order to avoid even the appearance of improper behavior, you should [disclose](#) any personal relationships of this kind immediately.

QUESTION  
& ANSWER

**My brother-in-law owns a consulting firm that has a lot of expertise in a business area we are targeting. Can I recommend his company to work for Delta Dental?**

You can recommend your brother-in-law's company for consideration; however, you must disclose your relationship at the time you make your recommendation. You may not be involved in the bidding or negotiation process, nor may you use your position in the company to influence those involved in the procurement process.



# COMPLIANCE WITH LAWS AND REGULATIONS

“If you think compliance is expensive, try non-compliance.”  
– Former U.S. Deputy Attorney General Paul McNulty

Delta Dental is committed to conducting its business in compliance with all applicable laws, rules and regulations. Our organization conducts business in all 50 states plus Washington D.C., Puerto Rico, the Virgin Islands, and Mexico and participates in federal exchanges and federally and state-funded programs such as Medicare and Medicaid. As such, we are subject to various state and federal laws and are accountable to those regulatory agencies.

Our Board of Directors has established an Audit Committee and delegated oversight of auditing and compliance functions to this Committee. We have a designated Chief Legal Officer and Chief Compliance Officer. The Chief Compliance Officer reports directly to the Chief Executive Officer (CEO) and provides unfiltered reports to the CEO and the Audit Committee on compliance risk areas, audit and enforcement activities, strategies to address these, and the results of these implementations.



Delta Dental has also designated an Executive Compliance Committee (ECC) that is chaired by the Chief Compliance Officer and consists of senior leadership with oversight over various operating areas. During meetings, compliance risk areas are discussed, including, but not limited to, those areas that impact the Medicare Advantage line of business. Results from these meetings lead the ECC to advise on action plans to monitor and control risks. When gaps are identified, we work to close them and follow up to ensure that the modified controls are fully implemented.



**QUESTION  
& ANSWER**

**I have a question about whether a business process is compliant with state law. Who should I check with?**

If you question whether something is compliant or have questions about compliance requirements, you should contact the [Department of Risk, Ethics and Compliance](#).



# ACCURATE BOOKS AND RECORDS

“The truth of the matter is that you always know the right thing to do.  
The hard part is doing it.” – General H. Norman Schwarzkopf





Whether you have prepared a timesheet, created an expense report, or approved an invoice, each of us contributes in some way to Delta Dental's financial statements, books and records. We are required to maintain and provide full, accurate, timely, and transparent reporting of information about our company and operations. Therefore, every business record we create and approve must be accurate, complete and reliable.

We have adopted specific practices to ensure that we make full, accurate and timely disclosures in our filings with regulators, and comply with our obligations under the law. Making or approving false or misleading records or documentation, or failing to properly disclose relevant items, undermines our ability to make good decisions and is strictly prohibited.



We must never do any of the following:

- Intentionally create false or misleading entries or records
- Knowingly fail to make correct entries on any company record or document
- Guess at an answer on a document
- Omit or conceal relevant information

The integrity of our internal controls and procedures is only as strong as our culture of open communication and honesty. If you have concerns about any aspect of our financial reporting or any accounting, audit or internal control issues, you should report them to your manager or using any of the methods listed in the [reporting section](#).



**I'm traveling to San Francisco for a business trip and plan to meet an old college friend for dinner. Is it okay if I submit the total cost of dinner for reimbursement?**

No, you may only submit your portion of the dinner cost for reimbursement. Since you are traveling for business, you are permitted to expense your dinner, but because your dinner with your friend is personal in nature and does not serve a business purpose, your friend's portion of the dinner cannot be expensed. For more information please refer to the Corporate Travel and Expense Reimbursement policy.

# INTELLECTUAL PROPERTY/ CONFIDENTIAL INFORMATION

It's like the adage *"What happens in Vegas, stays in Vegas"*...only stronger.



Company Systems should not be used to copy, send (upload), receive (download) or exchange copyrighted materials, trade secrets (including, but not limited to, items marked confidential), proprietary information (including, but not limited to, items which include the ownership marks such as ®, ™, etc.) or similar materials except as authorized by the owner of the material.

You should respect and protect the confidentiality of all information marked “Confidential,” even if such information has been misdirected to you. You may not use company systems to view or browse any employment, dental eligibility or claim information of any employee or enrollee of the company without a legitimate company business purpose.

For more information on protecting confidential information, Protected Health Information, and proprietary information, please refer to our [Privacy and Security policies](#).



### Data Privacy

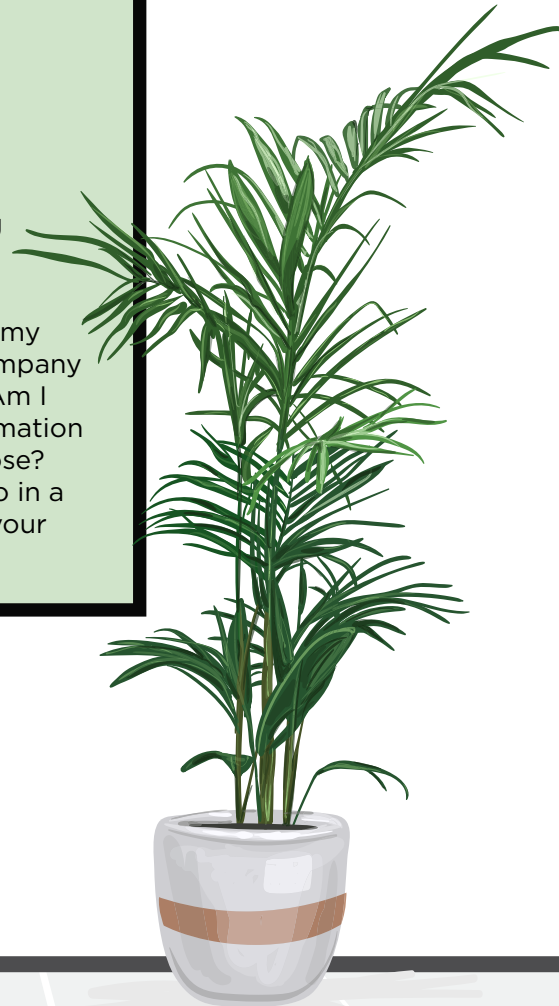
Delta Dental is committed to protecting the private information of our customers, business partners and team members. Everyone must take appropriate actions to mitigate risks to the privacy and security of any confidential information to which they have access. Confidential information is information that is restricted to individuals whose job functions require access. Confidential information is not made available outside of the company without appropriate Data Owner approvals/ business agreements.

Protected Health Information (PHI) or Personally Identifiable Information (PII) represents subsets of confidential information. PHI relates to the past, present, or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present or future payment for the provision of health care to an individual. PII is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. For more information about PHI and PII, refer to the [Privacy & Security Glossary](#).



**How do I know if I'm misusing information?**

When working with sensitive information, ask yourself: Will my colleagues, managers, and company be pleased with my actions? Am I using and accessing this information for the correct business purpose? If you are unsure of what to do in a situation, you should consult your manager.



You should apply the following safeguard practices when dealing with confidential information:

**Minimum necessary**

You may not access information you are not authorized to view for business or legal reasons. Only communicate the minimum amount of confidential information necessary to accomplish the assigned task.

**Awareness of place and content**

When discussing confidential information, be aware of your surroundings. Determine whether a confidential discussion is appropriate in that environment.

**Computer systems**

Keep confidential information on company servers and refrain from copying files to your desktop or saving them on your computer's local hard drive. When stepping away from your computer, it must always be locked. Passwords and other access credentials must be kept private.

**Printing**

Consider your need for hard copies before printing, and only print confidential information when absolutely necessary. Documents should be picked up from printers right away.

**Paper materials**

Confidential information should be locked up at the end of the work day or when leaving your work area for breaks, lunches and meetings.

**Destruction**

Delta Dental employs vendors to safely dispose of confidential materials. You should use the appropriately labeled shredding bins.

**Email**

When sending email, ensure that recipients' email addresses are correct and use secure email protocols when appropriate.

For more information, refer to Delta Dental's Protection of Confidential Information in the Workplace Policy.

## Records Management

Delta Dental is also committed to effective records management including meeting legal and operational requirements for record retention and disposal, privacy and confidentiality protection, optimizing the use of space, minimizing the cost of record retention and properly destroying outdated records. Our practice is to assess information, designate which information to retain as a company record, categorize it, protect it and dispose of it at the end of the record life cycle. Information that is of business value and reflects the decisions and transactions of the company must be designated as a record. At the end of the records retention period, the records must be completely destroyed, including all backup and duplicate copies, ensuring that information is no longer retrievable or useable. For more information, please refer to [Delta Dental's Record Management portal page.](#)



### QUESTION & ANSWER

**If I find PHI at the printer, what should I do with it?**

If you know who the documents belong to, you may deliver them to that person. If not, discard the documents in the nearest shred bin.



# PHYSICAL ASSETS

Protecting our physical assets helps improve our company's security.



Delta Dental protects our company assets so we can better perform our jobs and serve our customers. Delta Dental's assets – whether they are computers, equipment, supplies, confidential information, team member time or other physical and intellectual property – are meant to be used for the benefit of the company.

These assets are not for personal gain or for the benefit of others outside of Delta Dental. It is your responsibility to keep our assets safe from loss, theft, damage, inappropriate use or other forms of abuse or fraud. If you suspect theft in the workplace, or if you become aware of misuse of company assets, [report it immediately](#).

## Computer Use

You are given access to computers and computer systems to help you perform your job. Do not expect that anything you create, store, send or receive on company owned computers – regardless of its relation to Delta Dental business – will be private. Without prior notice or consent, Delta Dental may retrieve, review or disclose any material created, stored, sent or received on its computers, through the internet or any other computer network.

Delta Dental strictly prohibits using any of its computer resources for any of the following:

- Sending, receiving, downloading, displaying, printing or otherwise disseminating material that is sexually explicit, racially offensive, profane, obscene, harassing, fraudulent, defamatory or unlawful.
- Disseminating or storing destructive programs (e.g. viruses or self-replicating code), political or religious endorsements or solicitations or any other unauthorized material.
- Wasting computer resources by sending mass mailings, spending excessive amounts of time on the internet, playing games, engaging in non-work related online chat groups, unnecessarily printing multiple copies of documents or creating unnecessary network traffic.
- Using or copying software in violation of a license agreement or copyright. Only software properly licensed and approved may be loaded onto Delta Dental computers.
- Upon resignation or termination, destroying, removing, copying or deleting any information, files or messages stored on any Delta Dental equipment.



**QUESTION  
& ANSWER**

**What are examples of misusing company assets?**

Taking office supplies for personal use, submitting personal expenses on company expense reports, falsely reporting time worked, or presenting false information to receive health and disability benefits from Delta Dental.

# COMMUNICATING WITH EXTERNAL PARTIES

Once it's out there, you can't take it back.



Media and legislative inquiries may include in-person, mail, e-mail and/or telephone communications from anyone identifying him or herself as a news reporter, journalist, freelance writer, editor or an elected official, or an elected official's staff member, who requests information for any reason other than routine inquiries related to their enrollment under a company-sponsored benefit program.

All incoming requests should be forwarded immediately to [Communications](#). This includes media and/or legislative inquiries received by any company-affiliated office, as well as requests for interviews. For more information, please refer to the Media Relations & Public Affairs Policy.

With the exception Communications staff, and designated Legal and Senior Executive Staff, any team member interacting with a member of the media or legislature should politely decline to comment or release any information prior to reporting the contact to Communications staff and receiving authorization and direction on appropriate communications.

## Social Media

On company social media pages you may show support by “liking” or commenting in a positive way or sharing within your own networks. On your personal social media pages (e.g. Facebook, Twitter, Instagram) or through your own social media activity, you may not defame or malign team members, business practices, products/services, vendors, customers or business partners. You may not disclose proprietary or protected health information on any social media site.

Team members who communicate on public internet pages about Delta Dental must disclose their connection with the company and their role, and must clearly state that the views expressed do not represent the views of the organization.

Communications is responsible for final approval of all messages and content posted on company social media channels. Any public posting that may jeopardize our brand or reputation should immediately be brought to the attention of [Communications](#). For more information, please refer to the Social Media Policy.



### QUESTION & ANSWER

#### **Could my social media post impact Delta Dental's reputation?**

Yes. It's best to assume that anything you post could become front-page news. According to a CareerBuilder survey, 18% of employers have reported dismissing an employee because of something they posted on social media.

### Truth in Advertising/Media

Delta Dental understands the importance of accuracy and appropriate transparency in all internal and external communications. The information we provide needs to be correct and supported by our business practices.

As a regulated company, we are required to file periodic reports with insurance departments and other agencies in the states in which we do business. It is company policy to make full, fair, accurate, timely and understandable disclosures in compliance with all applicable laws and regulations in all required reports.

### Political Activity/Lobbying

You may choose to contribute personal time and money to political activities; however, you need to be clear and disclose as necessary that you are acting on your own behalf and not on behalf of Delta Dental. Delta Dental's name may not be used in a way that suggests the company sponsors or endorses your personal political activities, nor may you use your position to pressure

fellow team members to make political contributions or support/oppose particular candidates. More generally, you may not use any company resources (except as permitted by Government Affairs) for political purposes.

Our Government Affairs team ensures that Delta Dental has a voice in the decisions made by government officials. To make sure that our advocacy is consistent, coordinated, and in compliance with laws, you must obtain the approval of Government Affairs before contacting government officials on behalf of Delta Dental about legislation, regulations, programs or policies, or before providing any allowable gifts, meals, entertainment or travel to a government official. If you have a question or concern, [report it immediately](#).



# OUTSIDE EMPLOYMENT

Conflicts of interest occur when our outside activities could influence our professional conduct.



Team members with access to sensitive proprietary information are prohibited from holding outside employment or consulting positions with other dental service corporations, insurance companies or any organization administering dental benefits.

We recognize that any such dual employment raises potential conflicts of interest for the team member, as well as difficulties in maintaining strict confidentiality of company information. If there are any questions as to whether a particular position is covered by this policy, the People organization should be contacted. For more information, refer to the Outside Employment Policy.



QUESTION  
& ANSWER

**I received a job offer to work at a dental office on the weekends. Can I accept the job?**

Working in a dental office could mean you handle claim files, which could be a conflict of interest. You should inform your manager and seek guidance from the Legal Department before accepting the job.



# WORKPLACE SAFETY, HEALTH AND DIVERSITY

“To see a wrong, and not expose it, is to become a silent partner to its continuance.” - Dr. John Raymond Baker



Delta Dental firmly believes that everyone deserves the right to feel safe and respected. When someone is subjected to inappropriate conduct that interferes with his/her ability to perform their job, we all suffer. We all have a right to work in an environment free from violence, substance abuse and harassment.

### Violence

Delta Dental is committed to providing a safe workplace for all team members. In keeping with this commitment, we have established Workplace Security and Anti-Violence policies that prohibit actual or threatened violence by team members against co-workers or others. The Workplace Security policy also addresses situations in which outsiders enter the workplace and engage in violent acts or threaten team members with violence.

Although some kinds of violence result from societal issues that are beyond our control, Delta Dental believes that increased awareness and vigilance can improve the overall security and protection of our team members. In order to accomplish this objective, we require the cooperation of all team members. The company believes that team members may be better prepared to avoid or prevent violence if they are able to recognize early warning signs and follow appropriate response procedures. You will therefore play a crucial role in the administration of our anti-violence policy.

### **Substance Abuse**

We are firmly committed to a policy against the use of illegal and legal substances that impair the ability of employees to perform their job. In keeping with this commitment, Delta Dental has created the Substance Abuse Free Workplace policy and we strictly prohibit the use, transfer, possession, distribution, sale or being under the influence of drugs or alcohol while performing job functions, while on the company's premises, while operating a vehicle owned or leased by Delta Dental, or if driving your personal vehicle on company business.

### **Harassment**

We want Delta Dental to be a place where everyone feels safe, comfortable and has the opportunity for a thriving career. To achieve this, we must not turn a blind eye to intimidation, harassment or abuse of power. Harassment includes sexual harassment, but it is also any behavior that is disruptive or upsetting and creates an environment that is hostile and/or intimidating. Most people who are victims of harassment don't report it because they fear being labeled a troublemaker, losing their jobs or believe it will come down to their word against the other person's. Harassing conduct of any kind will not be tolerated. We strongly encourage everyone to report harassment so we can take immediate action. Managers who witness or receive reports of harassment are required to report it. For more information, refer to Delta Dental's Harassment-Free Work Environment policy.



QUESTION  
& ANSWER

**What is sexual harassment?**

Sexual harassment may consist of unwelcome verbal, visual or physical conduct that makes someone feel uncomfortable. Examples include:

- Requests for sexual favors, sexual advances or demands for dates
- Sexually oriented jokes, pictures, text or email messages
- Explicit or degrading comments about appearance

Does something feel wrong? Please share your concerns. We want to hear from you and will protect you from retaliation.



### **Affirmative Action/Nondiscrimination**

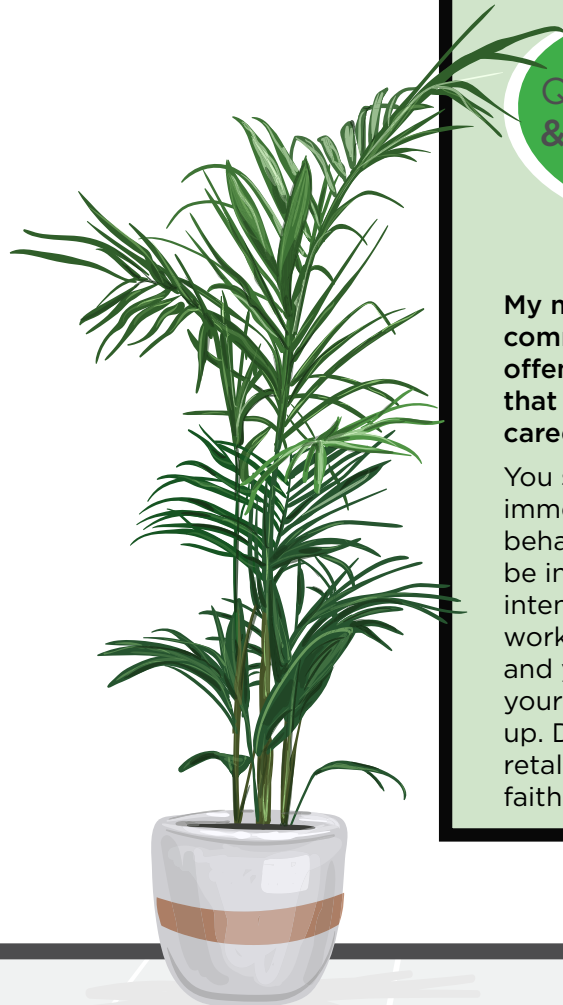
Delta Dental recognizes and reaffirms the vital importance of affirmative action to assure equal employment opportunity for all. We also see this policy as ultimately beneficial to Delta Dental as a company. We pledge to continue a determined and sustained effort in support of this belief and the principles in the Affirmative Action policy and Equal Employment Opportunity policy. Delta Dental is committed to affirmative action with the desired result of creating improved opportunities for groups that have been historically excluded or underrepresented, such as women and minorities.

Unlawful discrimination is prohibited. It is Delta Dental's policy that recruiting, hiring, transfer, promotion, termination, compensation, benefits, company-sponsored training, education, educational assistance, social, recreational and health programs and all layoff and return-from-layoff policies are to be applied without regard to race, color, religion, ancestry, sex, gender, gender identity/ expression, citizenship, national origin, age, sexual orientation, marital status, veteran status, pregnancy,

physical disability, mental disability or medical condition or any other characteristic protected by state, federal or local law. Retaliation and/or intimidation as a result of reporting violations of this policy will not be tolerated. Appropriate corrective action will be taken to address violations of this policy.

It is the responsibility of each team member, including all members of management, to disseminate, practice and enforce all aspects of the company policy of nondiscrimination.





QUESTION  
& ANSWER

**My manager frequently makes comments about my accent and uses offensive ethnic slurs. I'm worried that saying something will impact my career. What should I do?**

You should report this issue immediately. Your manager's behavior is inappropriate and should be investigated. Regardless of their intent, your manager has created a work environment that is intimidating and you should never fear that your career will suffer if you speak up. Delta Dental will not tolerate retaliation for reports made in good faith.

## Labor Practices

Delta Dental supports and complies with all applicable federal, state and local regulations that ensure safe working conditions and equal employment opportunities at all its locations. Delta Dental will not tolerate the use of labor trafficking, such as child labor or forced labor, in any of its locations. The company expects our suppliers and contractors with whom we do business to uphold the same standards. Should a pattern of violations become known and not corrected, we will discontinue the business relationship.

It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are additional examples of violations of conduct rules:

- Theft or damage of Delta Dental property or the property of any employee or member.
- Taking, or attempted taking, of money, property, data, or confidential information belonging to Delta Dental, whether by theft, fraud, or other unlawful means.

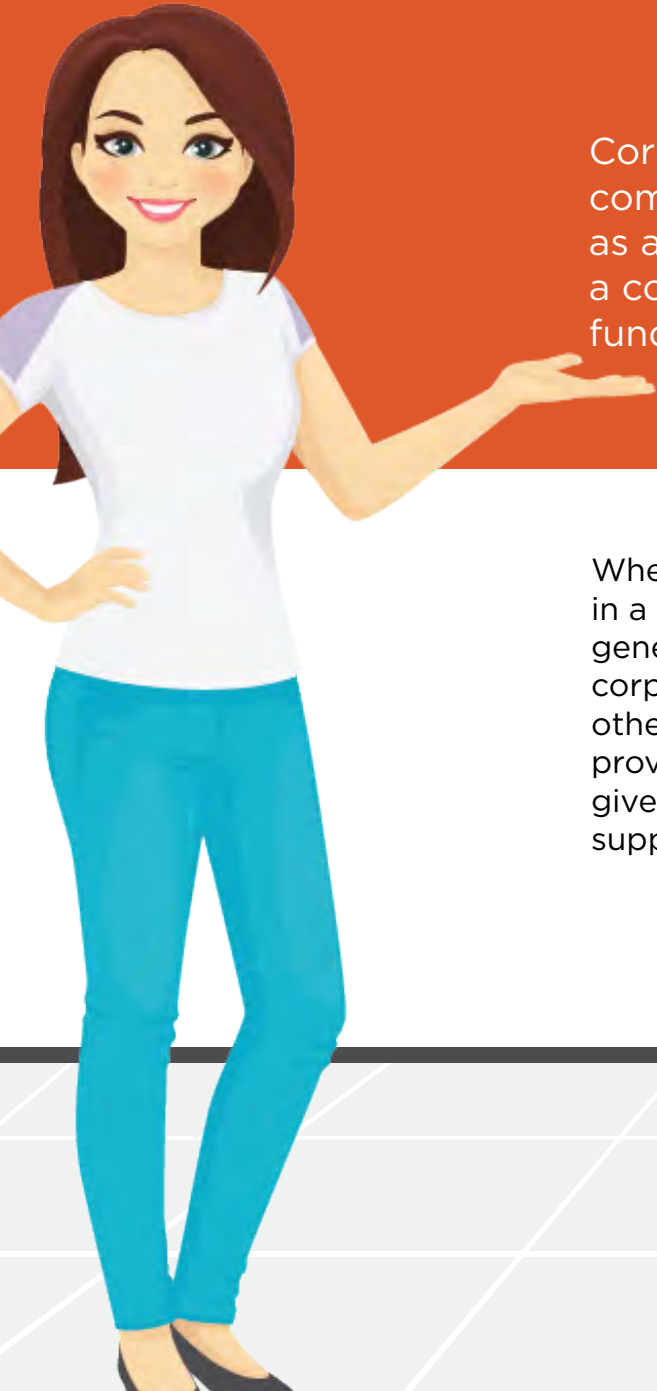
- Gambling in the workplace (including sporting pools, such as football, World Series, etc.).

Additional examples of prohibited conduct can be found in the Prohibited Conduct policy.



# C O R P O R A T E S O C I A L R E S P O N S I B I L I T Y

As a corporate citizen, we have an obligation to contribute in positive ways to advance the business landscape, community and environment we serve.



Corporate Social Responsibility (CSR) is important to our clients, communities and our team members. CSR should not be thought of as a social debt owed by a corporation. Corporations are nothing but a collection of words on a page, sealed with approval, until they are funded, staffed and operational.

When a corporation becomes operational, its production output creates impacts in a variety of ways, including the environment, impacting both current and future generations. Since the value that corporations bring to society also comes at a cost, corporations have a social responsibility to give back to communities (local and otherwise) that support that corporation's existence and good fortune. CSR, therefore, provides a platform for Delta Dental to conduct itself as a model corporate citizen and give back to its communities in ways that complement Delta Dental's interests and are in support of its purpose, mission and values.



QUESTION  
& ANSWER

**How can I get involved and share my ideas?**

- Do you see anything we could be doing better to “go green?” Send your ideas to [GoingGreen@delta.org](mailto:GoingGreen@delta.org).
- Interested in volunteer opportunities? Visit [Smiling it Forward](#) on the portal.
- Do you have questions or feedback? Submit it via PeopleConnect in **PATH**.



Delta Dental's CSR program rests on four conceptual elements that build on each other:

- **Economic responsibility** is ensuring that our company is financially healthy. This encompasses strategies that ensure our financial viability while also returning social value. You are empowered to look for ways to improve our value chain.
- **Legal responsibility** is acting in an economically responsible way and following all applicable laws and regulations. All team members play an integral role in ensuring legal compliance.
- **Ethical responsibility** is ensuring we're following this Guide and doing the right thing morally as we fulfill our economic and legal responsibilities. We promote employee welfare with competitive wages and benefits, and we promote workforce diversity and wage equality. We're also environmentally conscious in terms of taking steps to reduce our environmental impact.

- **Philanthropic responsibility** is ensuring that while we're economically, legally and ethically responsible, we're also going beyond what is required to benefit society. We give back to our communities through Delta Dental Community Care Foundation, direct corporate gifts, scholarships, match employee donations, and through our volunteer program. As a reminder, solicitation by an employee of another employee is not allowed while either person is on working time.

These concepts are part of corporate social responsibility — our impact on environmental and social well-being. Each team member is responsible for supporting these concepts and are encouraged to seek ways to contribute to the success of the CSR program. For more information on Delta Dental's CSR efforts, visit the [Community Center](#) section on our corporate website.







