

Code of Conduct

Last Approved: July 2021

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POLICY: All TriWest workforce members shall abide by all TriWest policies and procedures, specifically including this Code of Conduct, and are expected to conduct themselves in an ethical, professional and courteous manner at all times.

I. References

Policy & Procedures (P&Ps):

P&P 10301 Fraud, Waste and Abuse - Workforce Members and Vendors

P&P 10305 Compliance & Ethics Program

P&P 10307 Organizational Conflict of Interest Program

P&P 21002 Travel

P&P 21007 Purchasing and Supplies

P&P 21014 Vendor Rebate and Gift Card Policy

P&P 10311 Corporate Records Management

P&P 51500 EEO and Affirmative Action

P&P 52006 Sexual Harassment-Harassment

P&P 52009 Moonlighting

P&P 52012 Drug-Free Workplace and Substance Abuse

P&P 52013 Performance Improvement and Discipline

P&P 80300 Weapons

Risk Management Committee Charter

Applicable Federal Acquisition Regulations (FARs), including

FAR 3.104 Procurement Integrity

FAR 9.1 Responsible Prospective Contractors

FAR 9.406-2 Causes for debarment

FAR 9.407-2 Causes for suspension

FAR 32.2 Commercial Item Purchase Financing

FAR 52.203-13 Contractor Code of Business Ethics and Conduct

FAR 52.209-6 Protecting the Government's Interest When Subcontracting with Contractors Debarred, Suspended, or Proposed for Debarment

FAR 52.222-50 Combating Trafficking in Persons

II. Policy Scope

The purpose of this policy is to deter wrongdoing and to promote compliance by workforce members, suppliers, subcontractors, and government employees with applicable laws and honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships and the prompt reporting of violations of this policy to the appropriate persons. This policy applies to all TriWest workforce members.

III. Definitions

Confidential Information: includes any information which is not generally disclosed, which is useful and helpful to TriWest or could be useful or helpful to its competitors. This may include information or data on products, business strategies, sales, marketing, personnel, internal systems, subscriber information and financial data.

Immediate Family:

- Spouse or domestic partner (all following relations, for both Immediate family and Extended family, apply to those of the workforce member and spouse or domestic partner)
- Dependent children (son, daughter, stepchild, adopted)

- Other persons, including extended family, who share your residence (not tenants or employees)

Extended Family:

- All “Immediate family” (above)
- Non-dependent or adult children (son, daughter, stepchild, adopted)
- Grandchildren and their spouses
- Parents and grandparents
- In-laws (brother, sister, son, daughter, father, mother, grandparents)

Government Procurement Official: Defined in FAR 3.104-1 as any government employee who is participating personally and substantially in a Federal agency procurement and has an active and significant involvement in any of the following activities directly related to that procurement: (i) drafting, reviewing or approving the specification or statement of work for the procurement; (ii) preparing or developing the solicitation; (iii) evaluating bids or proposals, or selecting a source; (iv) negotiating price or terms and conditions of the contract, or; (v) reviewing and approving the award of the contract.

PHI: Protected Health Information (PHI) is defined in the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

PII: Any information about an individual that identifies, links, relates, or is unique to, or describes him or her, e.g., a Social Security number, age, military rank, civilian grade, marital status, race, salary, home/office phone number, and other demographic, biometric, personnel, medical, and financial information.

Providers: For purposes of this policy, Provider means any health care provider (i.e., physicians, hospitals, laboratories, etc.) eligible to receive reimbursement under a Government program (i.e., Veterans Administration)

Workforce Member: Includes full-time and part-time TriWest employees and temporary employees or contractors.

IV. Guidelines

1. Compliance with Laws and P&Ps

- A. The policy of TriWest is to comply with all applicable federal, state and local laws, rules and regulations (that have not been preempted by an applicable contract TriWest has with a Government agency) in jurisdictions where TriWest operates or does business, including applicable FAR provisions regarding contractor responsibility and all other applicable laws and regulations concerning the conduct of government contracting and subcontracting. In furtherance of this, TriWest workforce members shall abide by all TriWest policies and procedures, specifically including this Code of Conduct, and are expected to conduct themselves in an ethical, professional and courteous manner at all times. Any TriWest workforce member with questions or concerns regarding any legal issue should immediately bring the question or concern to the attention of the General Counsel. TriWest workforce members shall not discuss or otherwise enter into any agreement that has the purpose or effect of fostering any restraint of trade, unfair practice or other anti-competitive activity.
- B. TriWest’s workforce member and new hire compliance monitoring program includes comprehensive reviews and certifications that assist the company in hiring and employing workforce members that support TriWest’s commitment to compliance with applicable laws and honest and ethical conduct. TriWest screens its candidate employees to prevent employment of persons under indictment or convicted. TriWest screens candidate workforce members at the Director level or above or in a position to commit TriWest resources in order to prevent employment of persons listed by a Federal agency as debarred, suspended, or otherwise ineligible for Federal programs. TriWest’s compliance monitoring program also includes screening Director level or above workforce members annually, and current

members listed as having an active exclusion in the System for Award Management (SAM) Exclusions database (as referenced in FAR 9.404) or that have otherwise been sanctioned by relevant Federal agencies will be terminated in accordance with TriWest policy. SAM is available via <https://www.sam.gov>.

- C. TriWest's workforce shall act in alignment with core values established by the Company's leadership through the TriWest mission to "Provide customers with access to high-quality, cost-effective healthcare services and superior customer service" and by adhering to the following values:
 - Teamwork
 - Respect
 - Integrity
 - Work Ethic
 - Excellence
 - Service
 - Trust
 - D. Workforce members shall not engage in any conversations with Government Procurement Officials related to employment with TriWest. Workforce members shall report any conversations generated by such individuals regarding employment possibilities with TriWest to the Office of the General Counsel immediately.
 - E. The policy of TriWest is to provide full cooperation with any government agencies responsible for audits, investigations or corrective actions as referenced in FAR 52.203-13.
2. **Conflict of Interest (COI)**
All TriWest workforce members shall avoid situations where their personal interests could conflict, or reasonably appear to conflict, with the interests of TriWest. All TriWest workforce members shall immediately disclose any possible conflicts of interest to their supervisor or division Vice President and shall disclose the same on their next Conflict of Interest Disclosure Questionnaire.
3. **Outside Activities**
 - A. TriWest workforce members shall avoid outside employment or activities (including volunteer work) that would negatively impact their job performance with TriWest, conflict with their TriWest obligations, or negatively impact TriWest's reputation in the community. With regard to outside activities, Directors and above are subject to increased scrutiny regarding their adherence to ethical standards. Refer to P&P 52009 Moonlighting and P&P 10305 Compliance & Ethics Program Policy for additional information.
 - B. TriWest workforce members shall disclose any instance when they or a member of their immediate family has any ownership interest of five percent (5%) or more in any business. The workforce member shall follow the process outlined in this policy.
4. **Cash Gifts**
TriWest workforce members and members of their immediate family shall **not** accept cash gifts in any amount from, or give cash gifts to, any person or firm with whom TriWest does business or that is in a bidding and/or negotiating process for TriWest business.
5. **Non-Cash Gifts from Individuals and Firms Bidding/Negotiating with TriWest**
 - A. TriWest workforce members and members of their immediate family shall **not** accept gift cards or non-cash tangible gifts, including meals and entertainment from, nor give gift cards or non-cash tangible gifts, meals or entertainment to, any person or firm involved in a bidding and/or negotiating process for TriWest business.
 - B. Individuals and firms will be considered to be in the bidding and/or negotiating process from the time the individual or firm is requested to provide technical and/or cost and pricing information to the earlier of the date the individual or firm is notified by TriWest in writing that its bid or offer is no longer being considered by TriWest or the date of approval of the related business transaction by required parties.

- C. Additional limitations apply to those workforce members who have direct purchasing responsibilities. Such workforce members are not permitted to accept any cash, non-cash tangible gifts, including gift cards, meals, or invitations for trips and entertainment, social gatherings, or sporting events from any person or firm.
6. **Non-Cash Gifts from Individuals and Firms Doing Business with TriWest**
- A. Gifts of any kind from providers should be declined.
- B. TriWest workforce members and members of their immediate family shall be permitted to accept non-cash tangible gifts, including meals and entertainment from any person or firm, except providers, that has an executed contract and/or has an established business arrangement with TriWest.
- C. Workforce members receiving a vendor rebate card or gift card in any amount from any person or firm with whom TriWest has a business arrangement shall refer to P&P 21014 Vendor Rebate and Gift Card policy for appropriate action.
- D. TriWest workforce members shall maintain a record of each instance of acceptance by themselves or members of their immediate family of non-cash tangible gifts, cumulatively valued at One Hundred Dollars (\$100) or more (for the calendar year) including routine business meals, from any person or firm that has an executed contract and/or has a business arrangement with TriWest. The record shall itemize each instance and include the date the non-cash gift was received, the name of the person or firm providing the non-cash gift, the description of the non-cash gift, and value of the non-cash gift. Use the sample [Conflict of Interest Gift Tracking and Reporting](#)
- E. on TriNet under the “Documents and Forms” section to assist you in keeping track of these records. This record should be used to complete the Conflict of Interest Questionnaire.
- F. When the cumulative amount equals or exceeds Five Hundred Dollars (\$500) received from the same individual or vendor, the workforce member shall notify his/her manager, Human Capital, and the VP, Audit and Corporate Compliance in a letter or email including the detailed records.
- G. Additional limitations apply to those workforce members who have direct purchasing responsibilities. Such workforce members are not permitted to accept any cash, non-cash tangible gifts, including meals, invitations for trips and entertainment, social gatherings, or sporting events from any person or firm.
7. **Non-Cash Gifts Given to Individuals and Firms Doing Business with TriWest**
- A. TriWest workforce members and members of their immediate family shall be permitted to give gift cards or non-cash tangible gifts, including meals and entertainment, to any person or firm that has an executed contract and/or has an established business arrangement with TriWest.
- B. TriWest workforce members shall maintain a record of each instance of non-cash tangible gifts cumulatively valued at One Hundred Dollars (\$100) (for the calendar year) given by themselves or members of their immediate family, including routine business meals, to any person or firm that has an executed contract and/or has a business arrangement with TriWest. The record shall itemize each instance and include the date the non-cash gift was given, the name of the person or firm receiving the non-cash gift, the description of the non-cash gift and value of the non-cash gift.
- C. When the cumulative amount equals or exceeds Five Hundred Dollars (\$500) given to the same individual or vendor, the workforce member shall notify his/her manager, Human Capital, and the VP, Audit and Corporate Compliance in a letter or email including the detailed records.
8. **Gifts from or to Officers or Employees of Domestic or Foreign Governments**
TriWest workforce members and members of their immediate family shall not give or receive any gift to or from any domestic or foreign government officer or employee who have the appearance to effect or influence such a person within his or her area of official responsibility.

Prior to providing any food or beverages or giving any gifts, awards or “tokens of appreciation” to any domestic or foreign government officer or employee, such workforce member shall obtain written approval from the Office of General Counsel. All gifts, awards, or “tokens of appreciation” described herein shall be promptly reported to Corporate Compliance using the TriWest [Conflict of Interest Gift Tracking and Reporting](#)

9. Non-Cash Gifts, Awards, Door Prizes, Winnings, etc.

TriWest workforce members and members of their immediate family are allowed to accept products or services won as door prizes, in raffles or through similar activities. Acceptability of such items is based on the random nature of their award. These items do not need to be reported.

10. Cash and Non-Cash Gifts from Veterans/Beneficiaries

- A. TriWest workforce members and members of their immediate family shall not accept cash or gift cards or gift certificates, and are also discouraged from accepting either cash and/or non-cash tangible gifts from Veterans/beneficiaries in recognition for outstanding assistance and service to them, in performing their duties at TriWest. The Veteran/beneficiary and/or family should be encouraged to communicate their acclamation of outstanding service in writing to the workforce member’s immediate supervisor and division vice president. Workforce members should notify their management if they receive any gifts (including gift cards) from Veterans/beneficiaries that TriWest serves.
- B. If gift cards are received from a Veteran/beneficiary that TriWest has served (unless such Veteran/beneficiary is an immediate family member of the workforce member), the employee shall surrender the gift card to his/her management. Management, in turn, shall forward the gift card to their local Human Capital representative. Human Capital shall be responsible for returning the gift card to the Veteran/beneficiary with a letter thanking the Veteran/beneficiary for their thoughtfulness and explaining TriWest’s policy forbidding employees from receiving cash or gift cards from Veterans/beneficiaries.
- C. Management should contact Corporate Compliance for guidance with any other questions related to gifts from Veterans/beneficiaries. Non-cash gifts that are not returned shall be promptly reported to Corporate Compliance using the [Conflict of Interest Gift Tracking and Reporting](#)

11. Travel and Entertainment

- A. TriWest workforce members and members of their immediate families shall not accept invitations for trips paid for by firms or individuals with whom TriWest does business or are in a bidding process for TriWest business. However, in certain circumstances, the President and CEO, or his designee, may grant written exceptions to this policy for requests made in advance by TriWest personnel.
- B. TriWest shall only pay for expenses and travel necessary for the successful and economical operation of TriWest. TriWest shall reimburse its workforce members for business travel and entertainment expenses strictly in accordance with P&P 21002 Travel.
- C. All TriWest workforce members shall complete an [Expense Reporting Form](#) in accordance with P&P 21002 Travel.
- D. TriWest workforce members will be allowed to accumulate airline, hotel, and car rental frequent participation points for their own personal use.

12. Bribes, Kickbacks and Other Payments

- A. No TriWest workforce members shall make, offer or receive, either directly or indirectly, a bribe, kickback or other payment of any kind that is unlawful.
- B. No TriWest workforce members may receive funds from TriWest, either directly or indirectly, other than compensation for performance of his or her job, proper expense reimbursements or travel advances, unless such person has received prior written approval by the President and CEO.
- C. TriWest workforce members shall disclose any purchases, by the workforce member or their immediate family, with a fair market retail value greater than One Hundred Dollars (\$100) at

less than the fair market retail value from any company or individual involved in a bidding and/or negotiation process or doing business with TriWest. The workforce member shall follow the process outlined in this policy.

13. Company Loans

TriWest shall not extend credit in the form of a personal loan to vice presidents or above.

14. Responsibility for Financial Accounting and Reporting

The President and CEO, Chief Financial Officer, and Vice President and Controller have responsibility for ensuring that TriWest follows generally accepted accounting principles, cost accounting standards and cost accounting principles as contained in the Federal Acquisition Regulations.

15. Proper Accounting

- A. TriWest shall maintain a system of internal controls, which provides reasonable assurance that transactions are executed in accordance with management's authorization and are properly recorded. TriWest workforce members shall not create or maintain any unrecorded funds or assets. TriWest workforce members shall use corporate funds and assets solely for the benefit of TriWest and not for the personal gain of TriWest workforce members or others. TriWest workforce members shall not make any false, misleading or artificial entries in any financial books or records.
- B. TriWest shall not maintain a bank account or any other type of account, either domestic or foreign that is not reflected on its corporate books, records or financial statements.
- C. TriWest shall not approve or make any payment for any purpose other than that described by the documents supporting payment.
- D. TriWest workforce members shall not knowingly make any false, misleading or inaccurate oral or written statement to any accountant or auditor employed by TriWest or to any external or government auditor.

16. Restatement of Financial Statements

If TriWest is required to prepare an accounting restatement of its financial statements due to a material noncompliance with established accounting principles as a result of misconduct, the President and CEO and the Chief Financial Officer shall reimburse TriWest for any bonus or profits received in the twelve (12) months immediately preceding the noncompliance.

17. Confidential Information

"Confidential Information" includes any information which is not generally disclosed, which is useful and helpful to TriWest or could be useful or helpful to its competitors. This may include information or data on products, business strategies, sales, marketing, personnel, internal systems, subscriber information and financial data. TriWest workforce members shall not use confidential information except for furthering the legitimate interests of TriWest. At least annually, all TriWest workforce members shall receive and sign an Employee Confidentiality Agreement which stipulates that the workforce member may not disclose confidential information affecting or relating to any business in which TriWest is involved; must comply with all federal statutes relating to protected health information; may not disclose any confidential information concerning TriWest providers; and must not disclose computer data which is confidential and proprietary. Confidential information is not intended to prohibit or otherwise restrict workforce members from lawfully reporting waste, fraud or abuse to a designated investigative or law enforcement representative of a Federal department or agency authorized to receive such information.

18. Organizational Conflict of Interest (OCI)

See P&P 10307 Organizational Conflict of Interest Program Policy for description and instructions concerning workforce member compliance.

19. Accessing Veteran/Beneficiary Information or Data

TriWest workforce members who are themselves beneficiaries of a contract TriWest is part of and/or whose immediate or extended family member(s) are beneficiaries of a contract TriWest is

part of are not allowed to access their own or immediate or extended family member(s)' PHI or PII and/or any data related thereto on any TriWest computer systems that contain such information, or on any computer systems containing such information that are accessed through employment by TriWest. Access to PHI and/or PII by a workforce member who is a Veteran/beneficiary or whose immediate or extended family member is a Veteran/beneficiary is limited to the access points available to the general Veteran/beneficiary population. Workforce members are prohibited from authorizing, modifying, or deleting any claims, enrollment, or health care information about themselves or any immediate or extended family member. The unauthorized access of information or data pertaining to the workforce member or family members can result in disciplinary action up to and including termination.

20. **Retention and Destruction of Records**

TriWest workforce members should refer to P&P 10311 Corporate Records Management or any contract specific Records Management P&Ps for instructions related to the retention or destruction of records.

21. **Political Activity**

Federal laws restrict the use of corporate funds in connection with federal elections, and there are similar laws in many states. TriWest shall not reimburse TriWest workforce members directly or indirectly for any political contribution. Also, TriWest workforce members shall not use corporate resources such as meeting rooms, phone lines or printing in conjunction with their personal political activities. TriWest workforce members shall have the General Counsel determine in advance whether any proposed conduct, which could be construed as involving TriWest in any political activity, violates any applicable law or regulation.

22. **Drug-free Workplace and Substance Abuse**

TriWest strives to provide a drug-free workplace. All workforce members shall comply with TriWest's policy on drug use and testing (Refer to P&P 52012 Drug-free Workplace and Substance Abuse).

23. **Safety**

TriWest prohibits the possession of firearms or other deadly weapons on company premises (Refer to P&P 80300 Weapons). TriWest workforce members shall comply with all applicable laws and regulations relating to safety, health and environmental protection.

24. **Courteous and Professional Behavior**

TriWest is committed to a supportive work environment, where employees have the opportunity to reach their fullest potential. TriWest Workforce members are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination (Refer to P&P 52006 Sexual Harassment-Harassment and P&P 51500 EEO and Affirmative Action). When you speak out on public issues or in a public forum, you do so as an individual, and you should not give the appearance of speaking or acting on TriWest's behalf. (Refer to P&P 52025 Use of Social Media). You must always be aware that such services are increasingly being monitored by colleagues, government, Veterans and other interested members of the public, and you should do your best to be a positive representative of TriWest in all interactions.

25. **Policy Against Human Trafficking**

The federal government has a strict "zero tolerance" policy with regard to trafficking in persons, which is detailed in FAR 52.222-50. All TriWest workforce members and subcontractors must comply with all applicable provisions set forth in the policy, and any potential violations of that policy should be reported immediately as described in the Disclosure Process outlined below. Violations of the policy against human trafficking will result in disciplinary action up to and including termination.

26. **Disclosure Process**

A. **Responsibility**

- 1) Each workforce member is responsible for disclosing any potential or perceived code of conduct violation. The methods available to workforce members to report suspected violations include, their supervisor, manager, director, vice president, the

General Counsel, the VP, Audit and Corporate Compliance, the Ethics Hotline @ 1-800-500-0333, or the hotline for the agency applicable to the contract:

- a. Veterans Affairs Office of Inspector General hotline at 1-800-488-8244.
- b. Department of Defense Office of Inspector General hotline at 1-800-424-9098.

27. Confidentiality

- A. Maximum possible confidentiality will be maintained when addressing disclosures. Workforce members may contact the VP, Audit and Corporate Compliance directly.
- B. Assessments from management, General Counsel, and Human Capital are normally required before a COI determination can be issued by the VP, Audit and Corporate Compliance. Also, dependent on the nature of the disclosure, assessments from other functions may be required as well (e.g. Finance and Accounting, Security, etc.).

28. Organizational Conflict of Interest (OCI)

Refer to P&P 10307 Organizational Conflict of Interest Program for reporting OCI concerns.

29. Personal Conflict of Interest Disclosure

- A. To disclose a potential personal conflict, workforce members should submit a letter or e-mail to their immediate manager, Human Capital and the VP, Audit and Corporate Compliance including the following information:
 - 1) Workforce member name
 - 2) Telephone number
 - 3) Job title
 - 4) Date of employment
 - 5) Location
 - 6) Department number
 - 7) Manager's name
 - 8) Detailed description of workforce members' job duties and responsibilities, including the names of customers, subcontractors, competitors, vendors or suppliers with whom the workforce member has direct or indirect interface, and the length of time the workforce member has held these responsibilities.
 - 9) Detailed description of the situation or activity disclosed as a potential COI. If the COI is personal (non-business opportunity or activity), include the name and nature of the business and the names of any customers, vendors or suppliers. If the COI disclosure is a result of the employment, or potential employment, of a relative by a customer, competitor, vendor, or supplier, provide the relative's name and relationship to the workforce member, company's name, position title, and duties for which the relative is, or will be responsible.
 - 10) Statement of specific reason(s) for COI concern or non-concern regarding the COI disclosure.
 - 11) If the workforce member has received non-cash gifts, they should maintain a record of those gifts as described in this policy. As part of the Code of Conduct and periodic COI certifications, the workforce member shall forward all required records of gifts to the VP, Audit and Corporate Compliance.
- B. Disclosures are submitted to management and Human Capital for assessment, and then forwarded to the VP, Audit and Corporate Compliance for review. The VP, Audit and Corporate Compliance coordinates with the General Counsel for final determination.

30. Third Party Code of Conduct Disclosure

- A. TriWest workforce members also shall promptly report known or suspected violations of these policies by a third party (including a supplier, subcontractor, or government employee) using one of the following methods:
 - 1) To their supervisor, manager, director, vice president, the General Counsel or the VP, Audit and Corporate Compliance, or

- 2) If the workforce member is uncomfortable reporting known or suspected violations to any of the above, the workforce member may submit an anonymous report by using the TriWest EthicsLine (1-800-500-0333), or the hotline for the agency applicable to the contract:
 - a. Veterans Affairs Office of Inspector General hotline at 1-800-488-8244.
 - b. Department of Defense Office of Inspector General hotline at 1-800-424-9098.
- B. TriWest shall take all possible measures to protect the anonymity and confidentiality of the reporting individual. TriWest shall protect from retaliation TriWest workforce members making a good faith report of a suspected violation. No supervisor, manager, director or workforce member is permitted to engage in retaliation, retribution or any form of harassment against a workforce member for reporting a compliance related concern. Any supervisor, manager, director or workforce member who conducts or condones retribution, retaliation or harassment in any way will be subject to discipline, up to and including termination.

31. Compliance and Implementation

- A. TriWest workforce members shall liberally interpret the statements of policy in this code in favor of the highest standards of legal and ethical behavior, and shall resolve any doubt as to the highest meaning or coverage of this code by making inquiry of the General Counsel and/or the VP, Audit and Corporate Compliance, who in turn, shall consult with the President and CEO and/or the Chairman of the Board of Directors, as appropriate.
- B. The General Counsel and the VP, Audit and Corporate Compliance have the primary responsibility for determining if any investigation of a reported violation of this code is appropriate and for directing any such investigation. TriWest will take appropriate disciplinary action(s) up to and including termination of employment and/or criminal prosecution in all cases of actual violations of the code. If any investigation reveals that a code violation has occurred, the General Counsel and the VP, Audit and Corporate Compliance will jointly report the violations to the proper senior executives and Chairman of the Board. The Board of Directors will receive reports regarding all reported violations and their resolution.
- C. All TriWest workforce members shall periodically acknowledge in writing that they understand the code and are willing to abide by it; understand that adherence to the code is a condition of continued employment; and agree that they will report any violations of this code or of any other law or regulation by anyone employed by or transacting business on behalf of TriWest to their supervisor, manager, director, a senior executive, the General Counsel, or the VP, Audit and Corporate Compliance.

32. Conflict of Interest Questionnaire

- A. On at least an annual basis, each TriWest workforce member shall complete a COI Disclosure Questionnaire covering the previous calendar period described in the questionnaire. Each new workforce member shall complete a COI Disclosure Questionnaire covering the three (3) years immediately prior to employment at TriWest.
- B. On a semi-annual basis, TriWest directors and above shall complete an additional questionnaire as part of the compliance program required by the FAR (Refer to FAR 52.203-13).
- C. General Counsel and the VP, Audit and Corporate Compliance shall review and maintain the questionnaires.

V. Policy Administration

The General Counsel and the VP, Audit and Corporate Compliance are responsible for the administration of this policy.

VI. Exhibits/Attachments

N/A