

Elixir Ethics Every Day

Code of Conduct





Our Values. Our Culture. Our Commitment.

The work we do at Elixir matters. Through our actions, we show the world that Elixir is a different kind of company—one that celebrates a commitment to listening, caring and delivering on our promises. As we create new ways to manage pharmacy benefits, we must never lose sight of the values that got us here, and who we aspire to be. Our values are the foundation of our culture. They influence our behavior and our decisions that shape perceptions of our brand and our organization.

Our Code of Conduct is an important resource. We have a responsibility to read the Code and certify in writing that we understand it, as well as the importance of compliance, and agree to follow it. We should ask questions if something is not clear; we must act ethically and speak up if we see conduct that violates our Code or policies. Doing what's right isn't always easy; it takes teamwork, vision and a shared commitment to ethics. The Code is our guide, helping us understand what's expected of us.

Every day brings us new opportunities to be part of the solution and have a positive impact. Together, we create a company unlike any other—unique in our drive and our commitment to craft solutions to today's pharmacy benefits challenges.

CONTENTS

WHO WE ARE	1
As a Company—Why Do We Exist?.....	1
As a Brand—How Do We Want to be Perceived in the Market?.....	1
As Individuals and an Organization—How Do We Need to Behave?.....	4

USING THE CODE AS OUR GUIDE.....	5
A Shared Commitment, A Personal Obligation	6
Employee Responsibilities	8
Leadership Responsibilities	12
Our Compliance and Ethics Program	13
We Do Not Tolerate Retaliation	14

PROMOTING A RESPECTFUL WORKPLACE.....	15
Celebrating Diversity and Inclusion	16
Preventing Harassment.....	17
Ensuring a Safe and Healthy Workplace	19

UNDERSTANDING OUR RESPONSIBILITY TO OTHERS.....	21
Protecting Privacy	22
Interacting with Clients and Members.....	25
Interacting with Healthcare Professionals.....	27
Interacting with the Government.....	29
Interacting with Vendors and Suppliers.....	31

FOLLOW THE LAW.....	33
Meeting Federal Healthcare Program Requirements	34
Ethical Marketing and Advertising.....	36
Competing Fairly	37
Avoiding Insider Trading	39
Maintaining the Integrity of Records and Financials	41

SAFEGUARDING OUR RESOURCES	43
Protecting Business Information	44
Protecting Assets	46
Avoiding Conflicts of Interest	48
Knowing the Rules About Gifts, Meals and Entertainment.....	49
Speaking on Behalf of Elixir.....	52
Participating in Social Media	53
Engaging in Outside Activities.....	55
Protecting the Environment	57

WHERE TO GO FOR HELP	59
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Who We Are

As a Company—Why do we exist?

Elixir is a pharmacy benefits and services company with the scale and experience to provide real value to our clients and their members.

Through genuine partnership, we craft solutions that meet the unique needs of our clients. Whether a mid-market employer group who depends on our expertise or a regional health plan looking to grow and gain more control over their pharmacy program, we provide the right mix of products and services.

We help individuals and families at all stages of life get the medicine they need by crafting solutions to today's pharmacy benefits challenges.

We work to improve the quality of life and care for those in need. We believe that if we try to be fair, teach people how to help themselves and never settle for the status quo, that we have a chance—every day—to be someone's hero. We know that for each person, child or local business, our individual effort does matter and can help create a positive difference in our communities.



“ We form genuine partnerships to craft solutions to meet the unique needs of our clients and members. Our consultative, member-focused approach to pharmacy benefits offers unconventional levels of service, clarity and control.

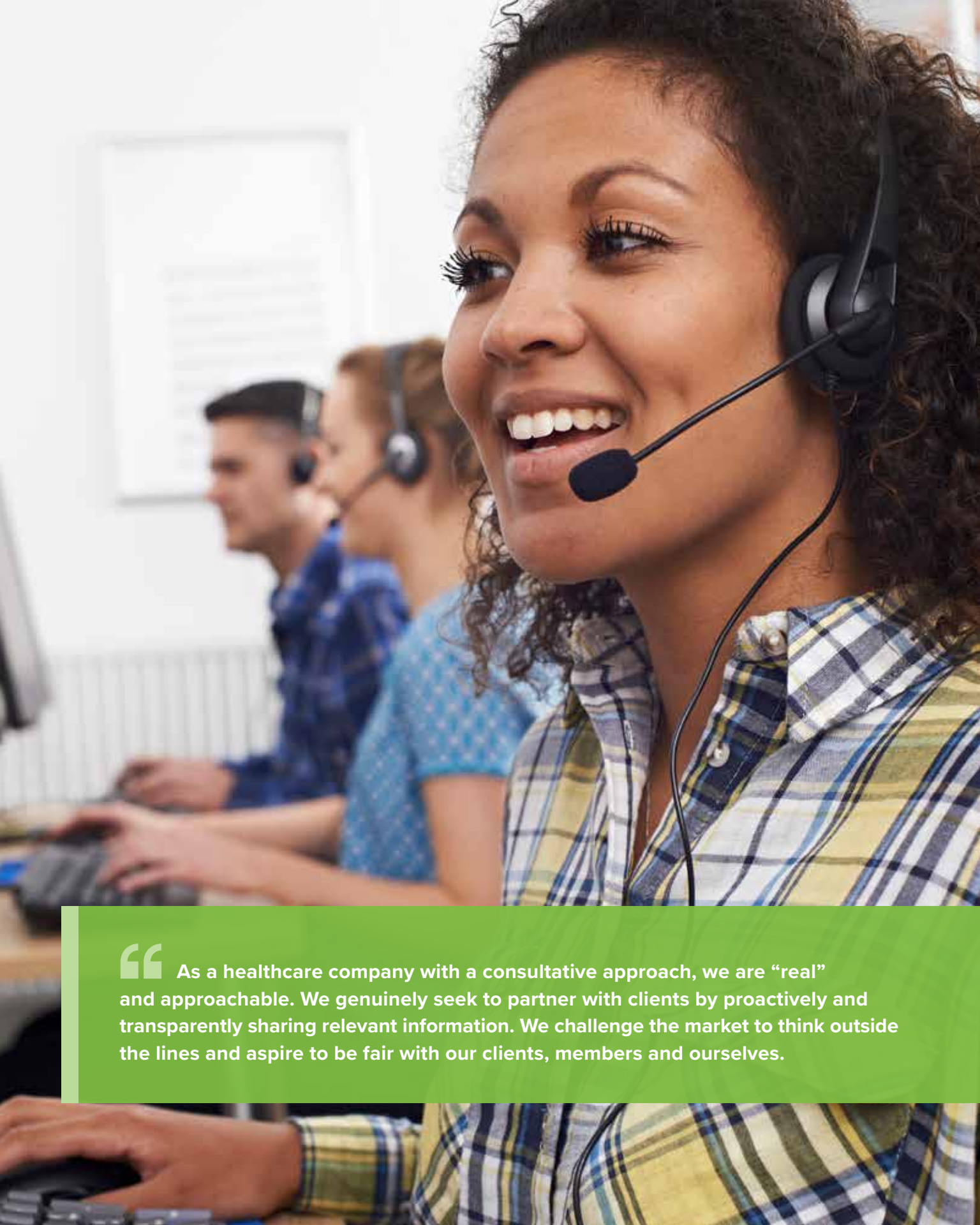
As a Brand—How do we want to be perceived in the market?

As a fully integrated healthcare company, we are built for today's healthcare world. We offer a robust suite of solutions that cover individuals across all stages of life. By further integrating the member care experience and improving the bottom line for health plans, labor groups and employer populations of all sizes, we hope to improve the whole-being health of the people we serve.

We align with our stakeholders' interests to help them achieve their healthcare objectives. We genuinely seek to partner with clients by proactively and transparently sharing relevant information.

We challenge the market to think outside the lines and aspire to be fair with our clients, members and ourselves. We are easy to do business with, delivering excellent service and a competitive financial offer in order to provide members the best prescription coverage, at a price everyone can afford.

Our consultative, member-focused approach offers our clients unconventional levels of service, clarity and control. Through a genuine partnership, we craft solutions to cure their pharmacy benefits challenges.



As a healthcare company with a consultative approach, we are “real” and approachable. We genuinely seek to partner with clients by proactively and transparently sharing relevant information. We challenge the market to think outside the lines and aspire to be fair with our clients, members and ourselves.

“ We respectfully collaborate internally and externally with honesty and integrity. As trusted teammates, we hold ourselves accountable to deliver on our commitments.



Who We Are

As Individuals and an Organization—How Do We Need to Behave?

Organizations build their brand reputations, cultures and businesses on the efforts and decisions of their individual employees. The way that we behave, and the actions that all of us take, ultimately shape our reputation in the hearts and minds of others.

At Elixir, we aspire to have our employees be an Every Day Hero for each other, as well as our clients and members. An Every Day Hero is an employee whose actions, words and decisions demonstrate our values.



Collaboration

- We genuinely relish the success of others.
- We appreciate and encourage differing viewpoints, but respect and support decisions, even after constructive conflict.
- We know that building trust and internal partnerships are the foundation for building strong external partnerships.

Honesty And Integrity

- We are ethical and decent in our actions. We do what is right and fair, even when no one is looking.
- We value the truth, embracing process and rules as valuable “protectors” of our people and customers.

Respect for Others

- We are advocates for each other and genuinely appreciate how diverse experiences and perspectives help us challenge the status quo.
- We find opportunities to recognize the efforts of others.

Excellence

- We go above and beyond.
- Our high standards and attention to detail produce thoughtful, quality work that helps us go faster, avoid re-work, identify and minimize risk and exceed expectations.

Results-Focused

- We value making a difference and having a measurable impact.
- We understand the need for priorities and we enjoy finding ways to independently solve problems.

Team-Oriented

- We put the greater good above our own needs and agendas.
- We understand the importance of flexibility and we always assume the best in others.

Accountability

- We are accountable for our actions to our clients and each other.
- We are responsive and share good and bad news in a timely manner.
- We proactively take responsibility to get involved in doing the work that needs to be done.



Using the Code as Our Guide

We reflect our values in every action we take. Our Code is our guide and sets the standards we must follow.

IN THIS SECTION:

A Shared Commitment, A Personal Obligation

Employee Responsibilities

Leadership Responsibilities

Our Compliance and Ethics Program

We Do Not Tolerate Retaliation

A Shared Commitment, A Personal Obligation

DOING THE RIGHT THING

Elixir's Code of Conduct represents our commitment to the highest standards of ethics and compliance. The Code is our guide to doing the right thing every day and is an essential part of our Compliance and Ethics program. It's the place we go to find out what our responsibilities are—both as a company and as individuals—and serves as our guide for bringing our values to life in every decision and interaction.

Who is the Code For?

Everyone who works for Elixir must follow our Code.

All full-time, part-time and temporary employees, our governing body, as well as contractors and vendors performing functions on behalf of Elixir must adopt our Code.

Code Violations

Compliance with our policies, our Code and applicable laws and regulations is a critical aspect of working for Elixir.

Elixir expects all employees to comply with the law and to treat each other respectfully. Violations of the Code, our policies or applicable laws affect not only our operations and our company reputation, but can also cause harm to members, our clients and other business partners.

A Shared Commitment, A Personal Obligation



Q&A IN PRACTICE

When does a violation occur?

It happens any time someone:

- Violates our policies and procedures, our Code, or the law
- Ignores misconduct
- Encourages others to act unethically

Elixir takes any allegation of misconduct seriously

Consequences for violating the Code or our policies can include disciplinary action and possibly termination depending on the seriousness and frequency of the violation. If an act of misconduct violates the law, it could also be referred to law enforcement for criminal prosecution.

Code Updates

Because laws and regulations are constantly changing, our Code must also change. In staying up-to-date with these changes, Elixir makes periodic updates to the Code. We will notify all employees of updates to the Code to ensure everyone is current and knowledgeable of the requirements and understands how to comply with the changes.

Acknowledgement of Requirements

Annually, all employees are required to sign an attestation confirming they have read our Code and agree to follow its standards, as well as Elixir's policies and procedures.

Employee Responsibilities

Being a part of Elixir means having a responsibility to:



Read the Code and our policies carefully to understand how they apply to us.



Act ethically and responsibly in everything we do.



Know and follow the laws that apply to our job.



Ask questions or raise concerns.



Keep all electronic and paper records secure and retained in accordance with Elixir Policy LE-02.



Speak up about any act that violates our policies, our Code or the law.



Complete all required training to strengthen our knowledge.



Cooperate with investigations and audits.

Employee Responsibilities

Making Good Choices

Every decision we make has consequences for ourselves, Elixir and the people we serve. The Code helps us navigate the complex laws and regulations that apply to our business. It can't address every possible situation we may face, but it points us to policies and resources for help. When we're unsure of the right thing to do, we start by asking some simple questions.



**EVERY
DAY**
hero

Each of Us, Every Day

If we answer "no" to any of the questions below, we stop and seek advice.

Remember, it is better to ask for help in advance than to choose the wrong path.



Is it legal?



Does it align
with our policies
and values?



Does it
strengthen our
good name?



Would we be
comfortable
sharing it on
social media?



Q&A IN PRACTICE

I inadvertently received some personal information about a member. The person who sent the information works for one of our vendors and is someone with whom I've shared a trusted business relationship for many years. The act was an honest mistake, and I don't want my colleague to get in trouble, so I'm inclined to say nothing.

Elixir is required to investigate and address HIPAA issues, even if we are not the wrongdoer. To ensure we comply with this requirement, Elixir policy requires all of us to report HIPAA incidents. We're advocates for our clients and members and fierce protectors of their private information. We do what's right, even if it's hard and even if no one is watching. You have an obligation to report the act and take the steps necessary to secure the data.



Leadership Responsibilities

LEADERS SET THE EXAMPLE

Our leaders set the example and act as role models in all that they do. As a manager, not only do you have a responsibility to set the tone for an ethical workplace, but also to mentor and motivate employees to conduct business honestly and in full compliance with our Code.

Inspire others

Create the kind of workplace where people feel comfortable coming forward with questions and concerns. In your everyday actions, show that you value the contributions of others and care about their needs, feelings and capabilities. Be an Every Day Hero in every interaction you have.

Make Elixir better

Actively seek out solutions that will better serve our clients and members. Collaborate with others on your team and across the organization to introduce new and improved ways of doing things. When others see your energy, your entrepreneurial spirit and your passion for transforming our industry, they will follow your lead.

Leaders should...

Create an environment that promotes the highest standard of ethics and compliance.

Keep an open door and encourage employees to raise questions or concerns.

Help employees understand what is expected of them under the Code and our policies.

Listen carefully to employee concerns and guide them through issues.

Act promptly when misconduct arises. Report it immediately to Compliance.

Prevent retaliation against any employee who reports compliance concerns.

Seek assistance from the Compliance & Ethics department when addressing questions or concerns.

Our Compliance and Ethics Program

SPEAKING UP

When we focus on doing the right thing, we may observe situations that seem improper. We must speak up and report any activity that appears to violate our Code, our policies or the law regardless of whether it's clear that a violation has occurred. It is a responsibility we all share.

“ It doesn't matter which **"Speak Up"** option we choose. What matters is that we share our concerns. When we do, Elixir protects our confidentiality to the greatest extent possible, investigates concerns promptly and takes appropriate steps to address the situation.

There are Several Ways to Speak Up

Talk to a manager.

He or she can answer questions and offer guidance.

Reach out to another resource.

We understand that talking to a manager can sometimes be uncomfortable. In those situations, we can report through other channels, such as contacting:

- Another member of management
- Human Resources
- The Compliance and Ethics department

Contact the Compliance Hotline.

Operated by an independent third-party organization, employees can contact the hotline (anonymously if they wish).

A professional interview specialist documents the concern and forwards it to Elixir for follow-up.

Compliance Hotline Available 24/7

Call: 866-417-3069

Report online: myethicsline.elixirsolutions.com

We Do Not Tolerate Retaliation

Employees should feel comfortable sharing concerns, without worrying about possible retaliation. Elixir prohibits retaliation or intimidation of any kind against anyone who reports a concern in good faith or participates in an investigation. Elixir takes retaliation seriously and will take disciplinary action against anyone who retaliates against another person, up to and including termination.



Each of Us, Every Day

Remember: Management can only fix problems they know about. It's up to each of us to point out activity that appears improper.





Promoting a Respectful Workplace

Each of us, and the talents, viewpoints and experiences we contribute, help us to become the kind of company we aspire to be.

IN THIS SECTION:

Celebrating Diversity and Inclusion

Preventing Harassment

Ensuring a Safe and Healthy Workplace

Celebrating Diversity and Inclusion

WHO WE ARE

We are people with different skills, backgrounds and viewpoints. We value our diverse workforce, and believe that we must embrace our differences and treat each other with respect and integrity to work together as a team.



Q&A IN PRACTICE

I applied for a new job that requires significant travel. I think a less-qualified coworker was selected because he is single. What should I do?

At Elixir, we require that employment decisions be made based on objective criteria, without regard to whether an employee is married or single. If you are aware of a violation of our policies, contact the Human Resources department.

How We Do Business

We provide an inclusive work environment.

We make employment decisions based on an individual's qualifications and abilities, not on race, color, creed, religion, sex, national origin, age, pregnancy, sexual orientation, gender identity, marital status, citizenship status, physical/mental disability, genetic information, status as a protected veteran or any other characteristic protected by law.

We carefully screen applicants.

We conduct criminal background checks and other required checks to ensure that those we hire or engage are eligible to participate in federally funded healthcare programs.



Preventing Harassment

WHO WE ARE

We honor the contribution of every employee and treat each other with respect and dignity. We create a workplace where individuals are able to do their jobs without fear of harassment or abusive conduct.

How We Do Business

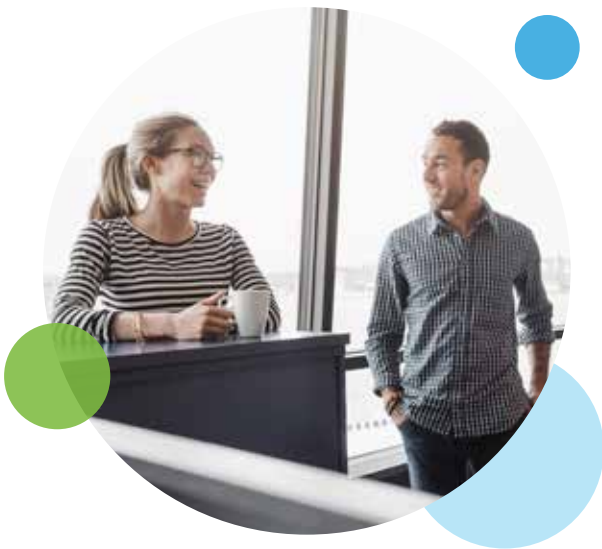
We promote a positive and productive atmosphere.

We are committed to a work environment free of harassment, including sexual harassment, threats, intimidating behavior or bullying. We know that harassment can take many forms, all of which are prohibited, including:

Physical activities, such as unwelcome hugging, touching or sexual advances, blocking someone's path or interfering with someone's work, pushing, shoving or tripping;

Written and verbal activities, such as making derogatory jokes, threats or slurs based on a protected characteristic or cultural stereotype, persistent name-calling or threatening physical assault;

Visual activities, such as displaying drawings, cartoons or pictures of a sexual nature or displaying provocative body language such as threatening gestures.





Q&A IN PRACTICE

A coworker of mine has a habit of getting really close and touching my arm while we're talking. It makes me very uncomfortable, and I want to speak up about it, but I've seen him do the same thing to other people. It doesn't seem to bother them. Am I just being too sensitive?

No. Your coworker's actions, while likely not meant to harass, are clearly unwelcome. If his behavior is making you uncomfortable, you should speak up about it. You may find that others feel the same way as you.

It seems like my manager is deliberately hostile and trying to undermine my work performance. How can I report the problem if she is the one engaging in the offensive behavior?

You are a valued member of Elixir's team and have a right to work without fear of intimidating, hostile or offensive behavior from anyone, including your manager. If you experience or see behavior that is inappropriate, speak with another manager, a senior leader, the Human Resources Department or other company resource.

Ensuring a Safe and Healthy Workplace

WHO WE ARE

We want to give our very best to those we serve. We report to work in good physical and mental condition and take an active role in ensuring our own safety. Following workplace safety and security rules and speaking up about any threats or acts of violence helps prevent putting people at risk.



Each of Us, Every Day

Protect our team:

- Always wear your identification badge. Use it to enter the building.
- Be alert to those who try to piggy-back into the building or enter through unsecured doors—don't allow individuals in unless they have a badge.
- Direct visitors to the main entrance and escort them to the proper destination.
- Bring disputes or differences with other employees to the attention of management.

How We Do Business

We maintain a drug-free workplace.

We report to work free of the influence of alcohol or illegal drugs. We do not use, possess, distribute, sell or work under the influence of alcohol or illegal drugs on the job or when representing Elixir. Prescription drugs ordered by a physician, which do not interfere with job performance, are permitted.

There may be instances where drinking alcoholic beverages while conducting company business is permitted (for example, at a client dinner). On these occasions, we comply with all laws, Elixir policies and exercise both moderation and good judgment.

Our Human Resources Department can arrange for confidential counseling and treatment for drug and alcohol dependence for employees who need help with a drug or alcohol problem.

We promote safety and security.

We follow all safety rules that apply to the jobs we do and immediately report any unsafe conditions to our manager. We maintain a work environment free from firearms, weapons or other dangerous or hazardous devices. We immediately notify our manager if we are aware of a safety or security risk.

We are committed to fair work practices.

We support the principles established under the United Nations Universal Declaration of Human Rights. We prohibit the employment of underage children or forced labor, as well as any form of physical punishment or abuse. We expect suppliers throughout our global supply chain to share our commitment to the same high standards.



Q&A IN PRACTICE

Some of my coworkers just returned from lunch and were joking about having had a few beers. Should I say anything about this?

Yes. A drink during lunch can affect the decisions we make on the job and have an adverse impact on the people we work with and the clients and members we serve. You have a responsibility to use good judgment and not only avoid alcohol during your lunchtime, but also to report anyone who violates this policy.



Understanding Our Responsibility to Others

We work every day to earn the trust of those we serve.

IN THIS SECTION:

Protecting the Privacy of:

- Clients and Members
- Healthcare Professionals
- The Government
- Vendors and Suppliers

Protecting Privacy

WHO WE ARE

We are people who respect the personal information of others. We share a commitment to maintaining the privacy of personally identifiable information (PII) and protected health information (PHI) and honoring the laws and policies that are designed to safeguard such information.

How We Do Business

We use information in the way it’s intended to be used.

We collect only the minimum PHI or PII needed to perform our work and—whether verbal, written or electronic—use it only for legitimate business purposes.

By knowing and following our policies, we help ensure compliance with the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH) and all other privacy laws and requirements that apply to our work.

PERSONALLY IDENTIFIABLE INFORMATION IS...

Information that can be used to trace someone’s identity or can be combined with other personal information to do so, such as:

- Name
- Address
- Social Security number
- Driver’s license number
- Account or credit card number

PROTECTED HEALTH INFORMATION IS...

A specific kind of personal information that identifies an individual (such as a name, phone number, email address or medical record number) and relates to a person’s:

- Physical or mental health
- Treatment
- Payment for healthcare

Protecting Privacy



Each of Us, Every Day

Safeguard personal information and protected health information by taking the following actions:

- Lock your computer if you leave your workstation.
- As you work, position your screen so others cannot see PHI or PII.
- Exit out of any menus or generic screens after finishing a confidential transaction.
- File away and secure any documents that contain PHI when you're not using them.
- Shred information (by using the locked shredding containers) when it is no longer needed.
- When working from a remote environment, comply with all applicable policies for securing confidential information.
- Verify fax numbers before faxing PHI.

We share information responsibly.

We must each do our part to protect and secure confidential information. Both PII and PHI are confidential and may be disclosed only in accordance with state and federal law. We grant access only to those who are authorized to know the information, need it to perform their jobs and are obligated to protect it.

We make sure that we:

Limit the amount of information we share to what is required to accomplish the task.

Encrypt any PHI that will be transmitted via email/Internet to a non-Elixir email address.

Ensure recipients know the information we're sharing is confidential.

Obtain required agreements from business partners or anyone outside of Elixir before sharing.

Seek help anytime we are not sure of the proper way to handle PII or PHI.



Q&A IN PRACTICE

Is it okay to send PHI or PII to someone outside of Elixir via email?

It depends. You need to make sure that there is a legitimate business reason for sending it and that the person you are emailing the information to is authorized to see it. All electronic PHI must be sent either via secure FTP site or by encrypted email by typing "Encrypt" into the subject line of the email or clicking the "Send Secure" button in Outlook.

While we were in the lunchroom, a coworker asked me about an issue, identifying the member's name and medication—was that appropriate?

No. Discussions that involve PII or PHI are sensitive and should be restricted to your work area. Don't discuss confidential business information in places such as elevators, planes or restaurants where others can hear it.

Interacting With Clients and Members

WHO WE ARE

We understand that individuals and families place their trust in us. We have an obligation every day to maintain that trust and treat others the way we would want to be treated.



Each of Us, Every Day

Build customer loyalty by being:

- Courteous
- Friendly
- Helpful
- Considerate
- Prompt in providing assistance
- Supportive

How We Do Business

We are transparent and accountable.

We are committed to providing superior customer service, and complying with our policies and any regulatory or contractual requirements. We do not discriminate, and we treat our clients and members with respect and integrity. We are professional in every interaction and serve people honestly and fairly.

We maintain our required licenses and certifications.

Many Elixir employees hold a position that requires a license or certification. We verify credentials and track renewal dates. Those of us who are credentialed have a responsibility to:

Complete all required paperwork and requirements to obtain/maintain our license/certification and remain in good standing.

Notify the Human Resources Department of any adverse changes in our license or certification status.

Follow the code of ethics of the applicable professional organization or licensure.



Interacting With Healthcare Professionals

WHO WE ARE

Our goals align with those of prescribers—we empower people to make informed decisions that will improve their health. In all of our interactions with healthcare professionals, we observe good business practices and demonstrate our commitment to quality care.

How We Do Business

We put clients and members first.

We ensure that interactions with healthcare professionals:

Serve a legitimate business purpose and are professional.

Are intended to benefit members or patients and improve the quality of patient care.

Never interfere—or even give the appearance of interfering—with a healthcare professional's independent judgment.

Do not involve offering or giving anything of value to influence or reward prescribing, using, purchasing, leasing or recommending certain products or services.

We comply fully with our policies and industry best practices.

We maintain integrity by avoiding situations that may present a conflict of interest and by complying with Elixir's rules for gift-giving and receiving.

We also comply with the standards set by industry associations such as the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals.





Q&A IN PRACTICE

Our Drug Therapy Management Program is designed to alert prescribers to members' adherence behaviors as well as potential gaps in care. Can we offer an iPad to physicians in order to encourage their interaction with members about issues related to these adherence behaviors?

No. This would be viewed as an inducement to the physician, which would be illegal and unethical.

One of our clients wants me to write and distribute a member communication about less-expensive formulary alternatives that are available and to advise members that there is no reason why they can't use the less expensive alternative. Is this okay?

No. A message such as this may represent false information to the member and interfere with the doctor-patient relationship.

Interacting With the Government

WHO WE ARE

We are knowledgeable of the unique requirements of government entities and representatives, as well as the laws that apply to our business. We uphold these laws and are honest, transparent and committed to the highest ethical standards in our interactions with the government.

How We Do Business

We cooperate with government investigations and audits.

We cooperate with requests for information from government agencies and regulators. If contacted by a government representative regarding an investigation or inspection, employees must contact the Legal Department or the Compliance and Ethics Department.

We cooperate and respond in an honest, accurate and truthful manner in providing information to the government. We never conceal, destroy or alter documents, make misleading statements or interfere with a government inspection or investigation.

We never provide gifts, meals or entertainment to government personnel.

Interactions with government employees and officials are controlled by strict regulations. We must not give anything of value to government personnel or invite them to social events except under very limited circumstances. Contact the Legal Department or the Compliance and Ethics Department for more information.





Q&A IN PRACTICE

Is it okay to provide low-priced promotional items such as pens or coffee mugs with the Elixir logo on them to my government colleagues?

There may be certain circumstances where this would be acceptable, but even this type of activity must be monitored closely to ensure strict compliance with the law. Never offer anything without seeking guidance in advance.

Interacting With Vendors and Suppliers

WHO WE ARE

We value our partnerships with vendors and suppliers. We select business partners based on their ability to meet our business needs and are committed to working together in a way that is free from conflicts of interest and consistent with all applicable laws and good business practices.



Each of Us, Every Day

Avoid improper, or the appearance of improper, conduct by never accepting from our vendors or suppliers:

- Inappropriate gifts, meals or entertainment
- Rebates or discounts
- Kickbacks
- Anything that could interfere—or could be perceived by others to interfere—with your objective decision-making

How We Do Business

We choose carefully.

In the selection of business partners, we base our decisions on objective criteria—quality, service, price, delivery and experience—not personal relationships or friendships. In our work with our vendors or suppliers, we:

Ensure they honor the law and our policies and procedures, including those that relate to gifts, meals and entertainment.

Encourage them to adopt their own standards of ethics consistent with their industry's best practice.

Regularly review their contracts and performance to ensure they're fulfilling obligations.

Protect their confidential personal and business information.

Report any unethical or illegal conduct that we see or suspect.





Q&A IN PRACTICE

One of our vendors offered me a ten percent discount for any personal purchases on anything they sell—is it okay to place an order?

No. This discount would be considered a gift, and it would be inappropriate to accept it unless the supplier offered the discount to everyone at Elixir.

A vendor with whom I've worked for many years approached me recently about a business venture. It seems like a good opportunity and has nothing to do with my job at Elixir. Is it okay to meet with her to explore it?

Probably not. Think about what this venture might look like to others, especially if you make decisions on behalf of Elixir that relate to using this vendor. This opportunity could actually be a conflict of interest. You should discuss this with the Compliance and Ethics Department before taking any further action.



Follow the Law

Integrity is at our core, driving us to do not just what we must do, but to go above and beyond, to do what is right.

IN THIS SECTION:

Meeting Federal Healthcare Program Requirements

Ethical Marketing and Advertising

Competing Fairly

Avoiding Insider Trading

Maintaining the Integrity of Records
and Financial Information

Meeting Federal Healthcare Program Requirements

WHO WE ARE

Elixir has built a reputation of trust and reliability in our industry. We conduct business in full compliance with applicable state and federal laws, regulations and contractual requirements.

FRAUD IS ...

Knowingly misrepresenting facts or submitting false information with the intent to cause damage, including financial damage, or obtain money or other benefits.

Fraud includes taking unfair advantage through the manipulation, misuse, or misrepresentation of information.

How We Do Business

We follow the laws and regulations that apply to our jobs.

Elixir does not tolerate fraud, waste or abuse including but not limited to business dealings and/or interactions with Elixir employees, non-participating and network pharmacies, vendors, plan members, health plan clients, and prescribers. Elixir prevents, detects, reports, corrects and when appropriate, refers to law enforcement agencies and all applicable regulatory agencies, instances of actual or suspected fraud, waste or abuse.

We operate in a highly regulated industry with a set of federal and state standards that are far-reaching and complex. As employees of Elixir, we are expected to understand and comply with all regulations that apply to our business and especially our individual jobs. Failing to comply with laws or regulations can have serious consequences—it can compromise an individual's health and violate the trust people place in us.

We meet our obligations under Medicare Part D.

In all applicable components of our business, especially as a Part D plan sponsor, as well as a pharmacy benefit manager to clients that operate their own Medicare plans, we comply with the requirements that govern those programs. We are accurate and complete in our coding and billing and do our part to prevent, detect and correct fraud, waste or abuse of the system.

Meeting Federal Healthcare Program Requirements



Q&A IN PRACTICE

My supervisor has asked me to do something that I believe violates the law. What should I do? I'm afraid I will be fired if I question her or refuse.

No one, at any level of our company, has the authority to ask you to do something illegal. Express your concerns to another company resource. See "Where to go for Help" on page 59.

How We Do Business

We're alert.

We speak up about acts of misconduct, such as:

- False statements, certifications or misrepresentations;
- Acts of fraud, waste or abuse;
- Claims for a product or service that are false, fraudulent or not medically necessary;
- Bribery or kickbacks; and
- Embezzlement.

We ask for guidance.

Legal and regulatory compliance can be complicated. Whenever questions regarding laws or compliance arise, we must seek help.



Each of Us, Every Day

Get to know the laws and regulations related to your work, which include:

- CMS Guidelines
(Medicare Prescription Drug Benefit Manuals)
- Anti-Kickback Statute
(42 U.S.C. 1320a-7b(b))
- Civil Monetary Penalties
(42 U.S.C. 1320a-7a)
- The Health Insurance Portability and Accountability Act
(42 U.S.C. 1320d-2)
- The Health Information Technology for Economic and Clinical Health Act
(42 U.S.C. 17938)
- False Claims Act
(31 U.S.C. 3729 and 42 U.S.C. 1320a-7b(a))
- Stark Statute
(42 U.S.C. 1395nn)
- Health Care Fraud Statute
(18 U.S.C. 1347)
- Regulatory Guidance
(Medicare, Medicaid and other regulatory requirements)

Ethical Marketing and Advertising

WHO WE ARE

We are trustworthy in all of our communications. Everything we tell our clients and members must be accurate and balanced, including what we say in all of our marketing and advertising materials and communications.



Q&A IN PRACTICE

I noticed that a particular medicine on our website says that it can be filled for a 90-day supply, but it is in our Specialty Tier, which only has a 30-day supply. Should this be addressed?

Yes. We are responsible for giving accurate information. You should share your concerns immediately.

How We Do Business

We comply with all advertising laws and regulations.

In our advertising or marketing efforts, we make sure that the way we talk about our services or the medications or devices we provide complies with all legal requirements. We follow our approval process for every ad or promotion to ensure compliance.

We are transparent in our marketing and promotions.

Because we are responsible for how our promotions are interpreted, we must never market products or services in a misleading way. Any claims we make must be backed by solid facts. We provide fair and balanced information, and make sure that any written or visual depictions accurately reflect the products we offer.

Competing Fairly

WHO WE ARE

We are proud of the work we do. We rely on the quality of our work to achieve success, never resorting to unfair competitive practices. This approach helps us uphold antitrust, competition and consumer laws, which support open competition and a fair and free marketplace.

How We Do Business

We understand how the laws apply to us.

Competition laws can be complicated, but they work to level the playing field among competing companies, so that each has the same ability to succeed. We interact fairly with competitors, in compliance with the law, and avoid any activity that could harm others' ability to compete.

We use good judgment.

In interactions with competitors at industry meetings or other events, we use care in our discussions, avoiding anything that could potentially violate antitrust laws.

We never make agreements with competitors that:

Fix prices or terms of sale for our services

Determine what services or products to offer and at what volume

Divide markets, customers or territories

Exclude or boycott another competitor or customer

Set the terms or fix the outcome of a bid

We never offer or accept bribes.

We are known for conducting business ethically, free from any kind of corruption or bribery. Our success comes from our hard work—not because we accept or offer bribes or kickbacks in exchange for preferential treatment.

We gather information fairly.

When seeking information about our competitors, we only use publicly available information. We never use confidential information or any other information that was improperly obtained from customers or other third parties. We are careful to protect our confidential information, too. We must never share proprietary information about Elixir with our competitors.



Q&A IN PRACTICE

I have a friend who works in sales for a competitor. We occasionally get together for lunch and talk about our jobs, but are careful never to make any inappropriate agreements. Is there any problem with this?

Keep in mind that you could violate antitrust laws even without making an inappropriate agreement.

All it takes is for either of you to inadvertently share confidential information. While you don't have to stop talking to your friend, you should limit your conversations to non-work-related topics to avoid a potential violation.

While attending a health fair recently, I overheard several competitors discussing splitting up sales territories. Since I only listened and didn't participate, is that okay?

No, it isn't. It is good that you didn't participate in the conversation, but you should have removed yourself from it entirely. Even the appearance of anti-competitive conduct can put you and our company at risk.

Avoiding Insider Trading

WHO WE ARE

Many employees are shareholders of the company and must comply with federal securities law and Elixir policy regarding stock trades. We respect every company's right to protect its confidential, nonpublic information. If we have access to such inside information, we may not use it to buy or sell stock or tip anyone else to do so.

How We Do Business

We recognize and protect inside information.

Through our jobs at Elixir, we may have access to material, nonpublic information about our company or companies with which we work, which investors would consider valuable in deciding whether to buy, sell or hold company stock.

Inside information could include:

- New or lost contracts or products
- Unannounced dividends, earnings or losses
- Changes in leadership
- Potential mergers or acquisitions
- Business plans

Information is considered "public" if it has been released to the public (through a press release, for example) and an adequate period of time has passed for markets to digest the information. In general, a delay of two business days is considered acceptable but, in some cases, a longer period may be required.

We follow the law and our policies.

Buying or selling a company's stock based on material, nonpublic information is called "insider trading," and it's against the law. Never buy or sell based on this information or share it with anyone outside of Elixir, including friends or family. "Tipping" others to buy or sell is also illegal.

We don't take chances—if we are unsure about what kind of information is inside information or whether or not we may buy or sell, we seek help from the Legal Department.





Q&A IN PRACTICE

After I saw this month's financials, I told my brother that I was excited about our company's financial performance. Even though I told him that this information was confidential, he used it to buy some stock in our company.

Did I do anything wrong?

Even if you didn't intend for your brother to use the information you shared, you may have engaged in "tipping" by sharing inside information with a family member. Since your brother purchased stock based on that information, your actions could have violated insider trading laws.

I was aware of some information about a potential acquisition, but I kept it secret. Now that the company has issued a press release about it, may I buy stocks based on that information now?

Even though the information has become public, you may need to wait to buy until a trading window opens. Check to see if our company is in a blackout period and, if so, refrain from purchasing or selling stock. In all cases, it's a good idea to ask before proceeding—check with the Legal Department.

Maintaining the Integrity of Records and Financials

WHO WE ARE

We are committed to presenting an honest and transparent view of our company's finances. Having accurate, complete and timely records inspires trust in our people, our products and our processes and demonstrates integrity to our stakeholders.

How We Do Business

We are careful and accurate.

Each of us has an impact on our financial records, regardless of where we work, so accuracy is critical. We never falsify or alter any financial record, no matter how small. We record all transactions properly, and never delay or accelerate reporting of profits or expenses. In our public financial disclosures, we ensure the information we report is clear, complete, accurate and timely. Our financial records include:

- Expense reports
- Statements of earnings or losses
- Payroll and tax records
- Timesheets
- Invoices or purchase orders
- Benefit claims

A LEGAL HOLD IS...

A notice issued when a company is involved in litigation and certain records relevant to that litigation must be retained. Contact the Legal Department if you have any information that is subject to a legal hold order. This information cannot be destroyed, altered or deleted.

We manage records properly.

We follow our policies and records retention schedule to properly organize and store our records, which could be email, print, text, voice or hand-written. We never destroy records that are needed for an investigation, audit or legal proceeding.

We watch for unusual activity.

In our daily work, we stay alert for irregularities or inaccuracies in our records, and never give in to pressure from anyone else to falsify a record or ignore something unethical.

We never knowingly engage in activities or conduct business with individuals involved in money laundering—a process in which funds generated through criminal activity (such as terrorism, drug dealing, fraud, etc.) are moved through legitimate businesses in order to hide their criminal origin.

Any suspicious accounting practices could be a sign of fraud, bribery or some other illegal act. We do not ignore suspicious behavior; we report it immediately.



Q&A IN PRACTICE

Last week, I received an invoice from a contractor, but there was not a signed agreement in our system. When I asked my manager about it, she said to go ahead and process it. I did as she directed because she is my manager, but I know we're supposed to have documentation that supports financial transactions like this one.

What should I do?

Start by talking to your manager about the incident. Perhaps there was a reason why the procedure did not need to be followed in this instance. If you are uncomfortable talking with her about the incident, or if you speak with her and still have concerns, talk to another member of management or other resource. You may be helping to uncover real misconduct.



Safeguarding Our Resources

We're good stewards of our assets, our resources and our reputation—they are the tools we use to build on our success.

IN THIS SECTION:

Protecting Business Information

Protecting Assets

Avoiding Conflicts of Interest

Knowing the Rules About Gifts, Meals & Entertainment

Speaking on Behalf of Elixir

Participating in Social Media

Engaging in Outside Activities

Protecting the Environment

Protecting Business Information

WHO WE ARE

Information about our business fuels our competitive advantage in the marketplace, so we must act as good stewards to protect confidential business information. We must identify which information is confidential and be proactive in safeguarding it.

How We Do Business

We are aware of the kinds of business information considered confidential.

We have an obligation to not only protect private information about people, such as PHI and PII, but also proprietary information that drives our business—information that we work with or may know about as employees of Elixir.

Confidential business information includes customer information, financial data, pricing and payments, business strategies, employee records, operations, acquisitions, divestitures, client information, affiliations and mergers, and marketing plans. It also includes intellectual property including proprietary computer software, our copyrights, patents and trademarks.

A TRADE SECRET IS...

Business information, kept confidential through reasonable efforts, which is valuable to Elixir because the information is not known to the general public. Examples include: Management and operational processes, chemical formula and detailed information about customers.

We respect and protect the confidential information with which we're entrusted.

We follow the internal systems and controls we have in place:

- We use confidential information for business purposes, never for personal use or gain.
- Before disclosing confidential information, we make sure there are legitimate business reasons for doing so, and if we share it with anyone outside of Elixir, we obtain a confidentiality agreement approved by the Legal Department.
- If we are new to Elixir, we protect our former employer's confidential information.
- If we leave Elixir, we return all confidential information and do not share it with our new employer.
- We review all content created on behalf of Elixir to determine whether it contains trade secrets or confidential information, and follow protocol to safeguard such information.

Protecting Business Information



Q&A IN PRACTICE

I received an internal email that contains confidential information. I know I must not forward the information to anyone outside of our organization who is not authorized to see it, but is it okay to forward it to any employee inside of the organization?

No. Confidential information should only be shared with employees within the company who are authorized to see it and have a need to know the information as part of their job duties.



Each of Us, Every Day

Help protect confidential business information—don’t discuss it with friends or family or in public places such as elevators, planes and restaurants.

How We Do Business

We protect confidential information entrusted to us by others.

Our safekeeping responsibility extends to confidential information about our customers, competitors, suppliers, vendors and other third parties. We comply with our obligations under all contracts and nondisclosure agreements.

USE CONFIDENTIAL DISCLAIMER WHEN...

Information that contains pricing or other proprietary data with business-to-business clients and third-party administrator consultant brokers. Include the following in 8 point or larger, Arial Narrow font:

CONFIDENTIAL: Do not copy or redistribute.

USE RESTRICTED PRIVACY MARK WHEN...

Information contained in the document is for Elixir staff ONLY. Include the following in 8 point or larger, Arial Narrow font:

RESTRICTED: Not for external use.

Protecting Assets

WHO WE ARE

Elixir assets include employee time, facilities, property, supplies, equipment, technology, computer software and data, and information systems. We recognize that all of the resources that help us to do our jobs also help us to build a successful future.

How We Do Business

We protect our assets from theft, fraud, waste and misuse.

We use Elixir resources responsibly and only to further the company's business purposes. We comply with our policies and never lend, sell or give assets away unless we are authorized to do so. We do not allow any use of organizational resources for personal financial gain.

We permit reasonable personal use of items, such as telephones, where the use doesn't interfere with our own work or the work of others.

We protect our employees' personal information.

We respect our employees' privacy, and will acquire and retain only the personal information necessary for Elixir's effective operation or as required by law.

We protect our electronic systems.

Access to computer and communication resources is a critical part of Elixir operations.

We:

Don't download or install unauthorized software or applications.

Protect our passwords.

Use caution in opening email attachments from unknown senders.

Lock our workstations when stepping away.

Log off at the end of our workday.

We are aware that any information we create, share or download onto our systems belongs to Elixir, and Elixir has the right to review and monitor system use at any time without notifying employees, to the extent permitted by law.

Protecting Assets

WHO WE ARE

Maintaining trust with our members and clients requires uncompromising integrity. That means, in part, steering clear of conflicts of interest. We understand the importance of keeping Elixir business interests separate from our personal activities and relationships and avoid actions that create—or even appear to create—conflicts of interest.

A CONFLICT OF INTEREST IS...

When an employee or an immediate family member is involved in an activity that affects, or appears to affect, his or her objectivity in making decisions on behalf of Elixir.

Employees, while acting for or engaging in any activity affecting Elixir must undertake such action with loyalty.

How We Do Business

We are knowledgeable of situations that can pose a conflict.

Although it's not possible to list every situation where a conflict can arise, there are certain situations where conflicts typically happen. Recognizing these situations is the first step in avoiding them.

We effectively manage conflicts.

In most circumstances, conflicts of interest can be managed if certain steps are followed. Employees who have a conflict or questions about what poses a conflict of interest should discuss it with their supervisor or the Compliance and Ethics Department.



Is It a Conflict?



Ask yourself:

Could this activity affect my objectivity in making decisions on behalf of Elixir? Could others view this as a conflict?

If the answer is "yes" or "maybe," immediately seek help before proceeding.



Elixir does allow employees to have a second job, but our number one priority is to Elixir



Political or charitable activities



Elixir restricts business courtesies to or from vendors. Gifts, meals & entertainment must not exceed \$150, not be cash or a cash equivalent, not be offered more than quarterly, & not be excessive or extravagant



Using an Elixir business opportunity for personal gain



Elixir does not approve of personal relationships between employees in the same direct reporting line



Family member who works for a competitor or a company that does/wants to do business with Elixir



Owning or investing in a competitor or a company that does/wants to do business with Elixir

Knowing the Rules About Gifts, Meals and Entertainment

WHO WE ARE

We recognize that the exchange of gifts, meals and entertainment (“business courtesies”) can be a customary business practice, but ensure that anything we give or receive is appropriate and reasonable. We avoid situations that may create a conflict of interest or harm our good name.

DEFINITION OF A VENDOR

Vendor refers to any vendor or other business associate who is doing business with or is seeking to do business with Elixir. Vendors may include, but are not limited to, pharmaceutical manufacturers, plan sponsors, and other suppliers of products, equipment and services, and professional services firms (e.g., legal, accounting, consulting).

How We Do Business

We are knowledgeable of acceptable and unacceptable business practices.

There are times when we receive from or extend to a vendor a gift or an invitation to attend an event (e.g., a local theater performance or sporting event) in order to further develop Elixir's business relationship. We check our policies and obtain any required approvals before offering or accepting anything of value.

Anything we give or receive must:

Be permitted by the company policies of both the giver and recipient.

Serve a valid business purpose.

Never be offered during a contracting or bidding period.

Never be solicited.





We restrict business courtesies to or from vendors.

Note that these are general guidelines. Please consult our policy—CE-09 Business Courtesies and Vendor-Sponsored Training and Seminars—before offering or accepting anything of value. Note that other departments may have more stringent requirements (e.g., LE-16 Interactions with Manufacturers).



Gifts must:

Not exceed \$150 per person annually

Not be offered more than quarterly

Not be lavish

Not be cash or cash equivalent (ex., gift card)



Meals must:

Not exceed \$150 per person per event

Not be offered more than quarterly

Not include travel or overnight lodging

Be attended by both parties

Be at a venue that would not embarrass the company

Be considered modest by local standards



Entertainment must:

Not exceed \$150 per person per event

Not be offered more than quarterly

Not be excessive or extravagant

Be attended by both parties

Knowing the Rules About Gifts, Meals and Entertainment



Q&A IN PRACTICE

If I take a vendor to dinner and the cost exceeds company limits, can I use my own money to pay for the meal?

No. The limits are in place to help us ensure there is no attempt—or even the appearance of an attempt—to influence decision-making.

One of our vendors sent me a gift basket for the holidays. I don't know its value, but it looks very expensive. What should I do?

It is okay to accept perishable or consumable gifts (like gift baskets, flowers or non-meal foods) that exceed our \$150 limit as long as they are reasonable and appropriate. A good practice is to share these kinds of gifts with other Elixir employees to the extent possible to avoid the appearance of anything improper. Also, be sure to complete the gift log on the SharePoint homepage when receiving any gift over \$25.

How We Do Business

We understand that there are significant restrictions when it comes to healthcare professionals, members and government officials.

We ensure our interactions with those we serve are above reproach. Elixir has a zero-gifts policy with healthcare professionals or members, which applies to both giving and receiving gifts. There are certain, however limited, occasions where we may provide meals or entertainment. These occasions must be approved in advance by the Chief Compliance Officer.

We never give or accept anything in exchange for a decision.

No gift, meal, offer of entertainment or travel—regardless of value or the frequency with which it's offered—is appropriate when it's given to obtain a favorable decision, an improper advantage or a referral. We operate with integrity and do not tolerate bribes or kickbacks of any kind.

Speaking on Behalf of Elixir

WHO WE ARE

As a company, we ensure business communications are consistent, accurate and timely. As employees, we use care in our communications, whether they are directed internally or externally, formal or informal.



How We Do Business

We don't speak on behalf of Elixir.

Unless we're authorized to speak on the company's behalf regarding business matters, we direct questions and requests to the appropriate resource. This best practice ensures regulators, government agencies, media outlets and the general public have consistent, accurate and timely information about our business.

Contacts for Questions & Requests



Media questions:

Contact the Marketing Department



Regulators/government questions:

Contact the Legal or Compliance & Ethics Department



Authoring papers/giving speeches:

Contact the Compliance & Ethics Department



Financial matters:

Contact the Finance Department



Legal matters:

Contact the Legal Department

Participating in Social Media

WHO WE ARE

We support and encourage the use of social media as a means for exchanging ideas and making connections, but we engage in social media activity on our own time, understand our responsibility to comply with all applicable laws and are careful to protect confidential information.

How We Do Business

We are responsible in our use of social media.

Social media offers a useful way to network, build relationships and share ideas, but we do not access or engage in social media during our work hours or on Elixir computers or devices unless we are authorized to do so as part of our jobs.

In our social media activity, we:

Never disclose member PHI or PII in any form, such as text or photo.

Never disclose confidential business information about clients, business partners or our company.

Comply with our policies and the law as they relate to harassment, intimidation, bullying and privacy.

Remember that we are responsible for the content we publish online and never assume our posts are private.

Elixir supports an employee's right to speak out publicly about matters of public concern or to participate in concerted activities related to the terms and conditions of employment. Nothing in this section of our Code or in any of our policies is intended to limit or interfere with that right.





Q&A IN PRACTICE

I talk about my life and my work on my Facebook page. Should I be concerned about what I say about my job?

Yes. You are personally responsible for the content you publish online, and your posts are not private. Protect proprietary information about Elixir and the people and companies with which we conduct business, and remember that anything that is unacceptable in the workplace is unacceptable online.

I wrote about my support for a local charity on social media. I described myself as an Elixir representative to add credibility to my comments. Is this okay to do since I'm making Elixir look good?

No. If Elixir is not directly involved with this particular charity, and you are not an approved representative, you may not present yourself that way.

Engaging in Outside Activities

WHO WE ARE

We are active members of our communities, voluntarily engaged in making our communities better places to live and work. We give our personal time and resources to the causes that are meaningful to us.



How We Do Business

We get personally involved.

Elixir understands that being a good citizen is a personal endeavor—one that should be fulfilling for every employee but never have a negative impact on the company, the people we work with or the people we work for.

Employees participating in outside activities must do so:

- Lawfully;
- On their own time;
- Using their own funds;
- Using their own resources; and
- Without financial support from Elixir.

We speak on our own behalf.

When we work for or support a political party, candidate or charitable cause, we make it clear that we are speaking and acting on our own behalf and do not represent Elixir in this effort. We respect our colleagues, never pressuring involvement in the causes we, as individuals, support.

We contribute responsibly.

As a company, Elixir supports certain charitable organizations. We ensure our contributions are legal and ethical and that they benefit charities, not private individuals. Any community or charitable use of organizational resources must be approved in advance by your supervisor.



Q&A IN PRACTICE

Could I use Elixir printers and copiers to create promotional materials for the candidate I support—as long as I use them after hours?

No. You must use your own resources to support your political activities— even if you plan to use them after hours.

A coworker of mine openly supports a different political party than I do. He knows that I don't agree with him, but he mocks my position and makes jokes about me all of the time. I let my colleague know that his behavior offends me. Did I do the right thing?

Yes. Every Elixir employee is entitled to his or her own political opinions. You did the right thing by letting your colleague know that his behavior offends you. Sometimes, a direct request like this is enough to stop the behavior. However, if it continues, it's appropriate to speak with your manager or someone else at our company about the situation.

May I use our email system to send out a request to coworkers to donate to a charity that I am involved with?

No. You may only use our email system to promote company-sponsored events. Your email may suggest that Elixir supports this charity. It may also put undue pressure on your colleagues.

Protecting the Environment

WHO WE ARE

We support environmental awareness by encouraging recycling and waste management in our day-to-day operations. We are committed to the purchase, use and disposal of products and materials in a way that makes the best use of natural resources and reduces the negative impact on the environment.



Each of Us, Every Day

Know which materials to recycle, such as: Computer paper, colored paper, aluminum, glass, plastics, printer cartridges.

If it harms the environment, it also harms: Our communities, our employees, our reputation.

How We Do Business

We follow environmental regulations.

We work together to achieve a balance between conducting our business effectively and protecting the environment. We meet and exceed all environmental laws and regulations and encourage others to do the same, including business partners and other third parties.

We use resources responsibly.

We conduct every aspect of our work safely and with our environment in mind. We use our resources responsibly, including conserving water, electricity and paper. We also take advantage of Elixir's recycling program by using the appropriate receptacles.





Q&A IN PRACTICE

What should I do if I become aware of a hazardous waste disposal situation?

Speak up about it immediately—before damage is done.

A contact of mine from one of our vendors has told me about some questionable waste disposal practices. Is that their problem or ours?

It's our problem as well as theirs. We expect our vendors to uphold our high standards. You have an obligation to take action by speaking up immediately.

Where to go for Help



Compliance and Ethics Department
(including Privacy)

ComplianceDepartment@elixirsolutions.com



Compliance Hotline

Call: 866-417-3069

Report online: myethicsline.elixirsolutions.com



Compliance and Ethics Department
(including Privacy)

ComplianceDepartment@elixirsolutions.com

Compliance Hotline

Call: 866-417-3069

Report online: myethicsline.elixirsolutions.com

Acknowledgment of Requirements

All employees are required to sign an attestation confirming they have read our Code and agree to follow its standards as well as Elixir policies and procedures.