

Conflict of Interest Statement

Introduction

At Blue Cross Blue Shield Global SolutionsSM, we are committed to conducting business with integrity, objectivity, and transparency. We expect our directors, officers, employees, and representatives to act in the best interests of Blue Cross Blue Shield Global Solutions and our customers, clients, business partners, and stakeholders. We are committed to identifying, disclosing, and appropriately managing actual, potential, and perceived conflicts of interest in accordance with applicable laws, regulations, and our internal governance standards.

What Is a Conflict of Interest?

A conflict of interest exists when an individual's personal, financial, or other private interests interfere with, or appear to interfere with, the individual's ability to make objective business decisions or fulfill professional responsibilities in the best interests of Blue Cross Blue Shield Global Solutions.

Conflicts may be actual, potential, or perceived. Even the appearance of a conflict of interest can undermine confidence in our business practices and decision-making.

Examples may include:

- Personal or financial interests in organizations that do business with or compete with Blue Cross Blue Shield Global Solutions.
- Outside employment or business activities that interfere with an individual's responsibilities to Blue Cross Blue Shield Global Solutions.
- Personal relationships that could influence or appear to influence business decisions.
- Acceptance of gifts, entertainment, or other benefits that could improperly influence business judgment.
- Use of the company's confidential information, assets, position, or business opportunities for personal benefit.

Permitted and Prohibited Conduct

Blue Cross Blue Shield Global Solutions recognizes that employees and representatives may have personal, financial, and professional interests outside of their employment. Such interests are generally permissible provided they do not create an actual, potential, or perceived conflict of interest or interfere with the individual's responsibilities.

Individuals are expected to:

- Act honestly, ethically, and in the best interests of Blue Cross Blue Shield Global Solutions.
- Exercise independent and objective business judgment.
- Avoid using their position, company resources, confidential information, or business relationships for personal or family benefit.
- Avoid outside activities or relationships that conflict with the company's legitimate business interests.
- Avoid situations that could result in fraud, misuse of company assets, or other improper conduct.
- Comply with applicable laws, regulations, contractual obligations, and company policies.

Disclosure of Conflicts

Individuals are expected to promptly disclose any actual, potential, or perceived conflict of interest through the company's established internal reporting processes. Reported conflicts are reviewed and, where appropriate, managed through reasonable measures designed to protect the integrity of business decisions and the interests of Blue Cross Blue Shield Global Solutions and its stakeholders.

Blue Cross Blue Shield Global Solutions is committed to fostering an environment in which concerns may be raised in good faith without fear of retaliation.

Compliance

Blue Cross Blue Shield Global Solutions takes conflicts of interest seriously and expects all individuals acting on its behalf to comply with this Statement and applicable internal policies.

Failure to comply with conflict-of-interest requirements may result in appropriate corrective action under applicable company policies. In addition, certain jurisdictions may impose civil, administrative, regulatory, or criminal penalties for undisclosed conflicts of interest or other related misconduct, depending on applicable law.

Blue Cross Blue Shield Global Solutions is the trade name of Worldwide Insurance Services, LLC (Blue Cross Blue Shield Global Solutions Insurance Services in California and BCBS Global Solutions Insurance Services in New York), an independent licensee of the Blue Cross and Blue Shield Association. Blue Cross Blue Shield Global Solutions is a Brand owned by the Blue Cross and Blue Shield Association.