

WPS Companies Supplier Code of Conduct

Overall Standards

For over 65 years, Wisconsin Physicians Service Insurance Corporation and its wholly owned subsidiaries (collectively, “WPS Companies”) have provided quality products and services to our customers. We view our contracted vendors and suppliers (collectively, “Suppliers”) as an integral part of our business success and we strive to select only those organizations that share our commitment to strong ethical standards. We understand that Suppliers are independent entities; however, we expect our Suppliers to adhere to our standards of ethical business conduct and compliance with all applicable laws and regulations while they are conducting business with or on behalf of the WPS Companies. Each Supplier is required to adhere to and comply with this Supplier Code of Conduct (“Code”) and to educate itself, its employees, and its agents and representatives about this Code’s provisions.

Supplier Performance Obligations

Suppliers shall:

- Comply with their specific contractual obligations under their contracts with the WPS Companies;
- Conduct their business activities and employment practices in compliance with all applicable laws and regulations;
- Conduct themselves in a professional manner at all times while conducting business with and/or on behalf of the WPS Companies;
- Follow and comply with the provisions set forth below:

Labor and Human Rights

- Encourage a diverse employee workforce and provide an employee workforce free from illegal discrimination or any other form of employment abuse.
- Commit to providing a harassment-free work environment by not tolerating actions, comments, inappropriate physical contact, sexual advances, or any other conduct that is intimidating, uncomfortable, or otherwise offensive or hostile.
- Treat employees fairly and honestly, including with respect to wages, working hours and benefits consistent with all applicable laws and regulations.
- Comply with applicable local child labor laws and employ workers who meet the applicable minimum legal age requirement for their location. If the minimum age of employment is not defined, the minimum age of employment shall be 15 years of age.
- Never use forced or other unlawful labor in the supply of materials, products, or services. All employment must be strictly voluntary. Suppliers must respect the right of workers to associate freely as permitted by and in accordance with all applicable laws and regulations.



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Health and Safety

- Provide safe and humane working conditions for all employees.

The Environment

- Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

Ethics

- Comply with all applicable laws and regulations.
- Compete fairly for our business, without making or offering bribes, kickbacks or giving anything of value to secure an improper advantage.
- Keep financial books and records in accordance with all applicable legal, regulatory, and fiscal requirements and with accepted accounting practices for the industry in which the Supplier operates.
- Deliver products and services meeting applicable quality and safety standards.
- Support compliance with this Code by establishing appropriate management monitoring and compliance processes and cooperating with reasonable assessment processes requested by the WPS Companies.
- Respect the WPS Companies employees' duty to comply with the WPS Companies' policies regarding business gifts and entertainment and conflicts of interest.

Monitoring

It is the responsibility and obligation of the Supplier to ensure its employees, agents, representatives and subcontractors understand and comply with this Code. Additionally, the Supplier is required to inform the WPS Companies when the Supplier is aware of a violation to this Code. Suppliers are obligated to self-monitor their compliance with the provisions of this Code.

Reporting of Questionable Behavior and/or Possible Violations

Suppliers are encouraged to maintain a reporting helpline or other reporting mechanism that allows for anonymous reporting of questionable behavior. If no such helpline or other reporting mechanism exists, Suppliers should report questionable behavior or a possible violation of this Code to our 24/7 confidential ethics helpline that is maintained by an independent service provider:

Telephone: 1-866-293-2391

Web Site: www.ethicspoint.com.

The WPS Companies will not tolerate any retribution or retaliation taken against any person who has, in good faith, reported questionable behavior or a possible violation of this Code.

Online Version

This Code is available online at: www.wpsic.com. This Code may be updated and revised by the WPS Companies from time to time. Please refer to the above web site for changes to this Code. Please contact the WPS Companies' Corporate Compliance Officer at (608) 221-5125 if the Supplier has any questions about its obligations under this Code or the WPS Companies' enforcement of this Code.

Effective Date: July 30, 2009

Last Revised Date: September 26, 2013