



**BlueCross  
BlueShield  
Arizona**

An Independent Licensee of the Blue Cross Blue Shield Association

# Blue Cross Blue Shield of Arizona Supplier Code Conduct



Blue Cross Blue Shield of Arizona is committed to the highest standards of integrity and social responsibility, and expects our suppliers to make, a similar commitment. The AZ Blue Supplier Code of Conduct (Code) describes the expectations of how its suppliers conduct business. AZ Blue expects suppliers to act in accordance with the Code.



## OVERVIEW

The Code reflects BCBSAZ's values and sets forth what is expected of our suppliers in the following areas:

1. Labor Practices
2. Sustainability and Environmental Practices
3. Ethics and Anti-Corruption
4. Data Security and Privacy
5. Diversity and Inclusion
6. Use of the Blue Cross Blue Shield of Arizona and/or Affiliate Name and Likeness
7. BCBSAZ Rights



## POINT OF CONTACT FOR QUESTIONS OR CONCERNS REGARDING THE BCBSAZ SUPPLIER CODE OF CONDUCT

Please direct all questions or concerns regarding the BCBSAZ Supplier Code of Conduct to the following mailbox: [compliance@azblue.com](mailto:compliance@azblue.com)



## LABOR PRACTICES

### **Involuntary Labor**

Suppliers shall not use any form of forced, coerced, or involuntary labor in any part of their organization or supply chain. Suppliers shall not use physical punishment, threats of violence, verbal or psychological abuse as a method of discipline or control. All labor must be voluntary, and workers must be free to leave work or terminate their employment.

### **Underage Labor**

Suppliers shall not use child labor in any part of their organization or supply chain. Suppliers shall adhere to applicable laws regulating minimum working age.

### **Working Hours**

Hours of work for individual employees at a supplier are not to exceed the maximum set by applicable laws.

### **Wages and Benefits**

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Deductions from wages as a disciplinary measure are prohibited. Suppliers shall inform workers regarding the basis upon which they are being compensated, in a timely manner. Suppliers are also expected to communicate to the “Worker” whether overtime is required if allowed by the local employment laws and regulations and the wages paid for such overtime.

### **Non-Discrimination**

Suppliers must respect the right of every person to participate in all aspects of employment without regard to their personal characteristics or beliefs (examples may include but are not limited to a worker’s race, color, religion, age, disability, marital status, veteran status, gender, gender identity, sexual orientation, ethnic or national origin). Suppliers’ policies and practices should result in employment decisions being made on the basis of the workers’ ability to do the job, and not on their personal characteristics or beliefs.

### **Freedom of Association**

Suppliers shall respect the right of all workers to form and join trade unions, or not to form or join, of their own choosing, as set forth in local laws, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representative shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of retaliation. Suppliers will ensure workplace environments permit workers to pursue alternative ways to organize (e.g., worker councils, or worker-management conversations, etc.) in cases where there are regulatory constraints on freedom of association.

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## SUSTAINABILITY AND ENVIRONMENTAL ISSUES

### **Environmental Compliance**

Suppliers shall comply with all applicable environmental laws and regulations.

### **Resource Reduction and Pollution Prevention**

Suppliers shall use reasonable means to conserve natural resources and impact on the environment.

### **Waste and Emissions**

Suppliers shall have systems in place to ensure the safe handling, storage, recycling, reuse, and management of waste.

### **Spills and Releases**

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases to the environment.



## ETHICS AND ANTI-CORRUPTION

### **Anti-Bribery and Corruption**

Suppliers shall conduct business in full compliance with anti-corruption and anti-money laundering laws that govern the jurisdictions in which suppliers conduct business.

- a. Suppliers must comply with all applicable anti-corruption and anti-money laundering laws and laws governing lobbying, gifts, donations, hiring, and payments to public officials, political campaign contribution laws, and other related regulations. Suppliers must prohibit any and all forms of bribery, corruption, extortion, and embezzlement.
- b. Supplier shall not, directly or indirectly, promise, authorize, offer, or pay or exchange anything of value (including but not limited to gifts, travel, hospitality, charitable donations, or employment) to any government official or other party to improperly influence any act or decision of such official for the purpose of promoting business interests.
- c. "Government official" refers to all of the following: (i) any employee of a government entity or subdivision, including elected officials; (ii) any private person acting on behalf of a government entity, even if just temporarily; (iii) officers and employees of companies that are owned or controlled by the government; (iv) candidates for political office; (v) political party officials; and (vi) officers, employees and representatives of public international organizations, such as the World Bank and United Nations.
- d. Suppliers must report signs of any personnel, representative, or partner performing unethically or engaged in bribery or kickbacks.

### **Fair Competition**

Suppliers shall follow the laws that preserve a fair and competitive marketplace, including anti-trust laws. Suppliers shall employ fair business practices, including accurate and truthful advertising.





## DATA SECURITY AND PRIVACY

### Information Security

Suppliers who access any of Blue Cross Blue Shield of Arizona's information systems will be required to undergo a privacy and security assessment and shall have cyber security processes and controls in place to provide reasonable protection of data, personal information, proprietary and confidential information, including information that they access, receive or process on behalf of BCBSAZ. In addition, suppliers must comply with all applicable privacy / data protection and information security laws and regulations.

### Personal Information and Privacy

Suppliers shall protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of BCBSAZ should only be used, accessed, and disclosed as permitted by the Supplier agreement.

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## DIVERSITY AND INCLUSION

### Non-Discrimination and Workplace Diversity

Suppliers shall comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment and retaliation.

### Supplier Diversity

Suppliers shall employ inclusive sourcing processes that promote equal opportunities.

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## USE OF BLUE CROSS BLUE SHIELD OF ARIZONA AND/OR AFFILIATE NAME AND LIKENESS

Suppliers shall not use the name, likeness, or logo of Blue Cross Blue Shield of Arizona (or those of our affiliates or products) in publicity or advertising without our prior written consent.

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## BCBSAZ RIGHTS

This Code does not supersede any applicable law or any term in an agreement between BCBSAZ and a supplier. If there is a conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls. BCBSAZ reserves the right to update or change the Code requirements.

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