



# CODE OF CONDUCT

Pinnacle Financial Services takes pride in having earned the reputation as an honest, ethical organization. Every individual who is employed by, or who contracts with, Pinnacle is bound to uphold high ethical standards in performing his or her responsibilities. The purpose of this Code of Conduct is to list what values we hold as essential to Pinnacle's identity. This code should be read and understood in conjunction with the Compliance Charter and the Policy and Procedure manual. It is the personal responsibility of every individual to understand and adhere to this code to the best of his or her ability. This code applies when dealing with potential customers, policyholders, business associates and coworkers.

Each individual should remain familiar with the Code of Conduct and commit to its principles. Actions contrary to the Code of Conduct may also subject you to civil and/or criminal prosecution.

**I have reviewed this document, and received a copy. Furthermore, I agree to adhere to all of the points outlined within this document.**

**NAME:** \_\_\_\_\_

**SIGN:** \_\_\_\_\_

**DATE:** \_\_\_\_\_

## EVERYONE MUST

- Be honest and ethical in all endeavors and pursue the highest standards of excellence.
- Deal with others in a professional and honest matter, using respect and dignity, thus fostering an environment where individual differences are valued.
- Build client relationships through high performance.
- Conduct themselves with the highest level of ethics at all times.
- Maintain an open culture where questions and concerns are freely discussed, teamwork is supported, and constructive feedback is provided to support each other.
- Comply with laws, rules and regulations applicable to Pinnacle's business, policies, procedures, and guidelines.
- Use good judgment and common sense
- Avoid negatively impacting or damaging the company's reputation, causing embarrassment to Pinnacle.
- Be loyal and conduct Pinnacle' affairs without creating an actual or potential conflict of interest.
- Never engage in high pressure sales activities or any form of intimidation to generate a result.
- Adhere to all CMS, Pinnacle, and plan sponsor standards to protect patient information under HIPAA.
- Protect patient information and proprietary information, and discuss only as required.
- Prepare client documentation and records accurately, honestly, and per CMS guidance.
- Make prompt disclosure before any action that may involve, or appear to be a conflict of interest.

IN CONSIDERING THE RIGHT THING TO DO,

### YOU SHOULD ASK YOURSELF:

- Are your actions consistent with Pinnacle Financial Services' values and this Code of Conduct?
- Could your actions give an appearance of impropriety?
- Would you be proud of your actions?
- Could you defend your actions if called upon to do so?
- Would you be embarrassed by your actions if they were questioned?