

ETHICS GUIDE

Code of Business Conduct





Creating smiles.
Improving health.
Enhancing lives.

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OUR VALUES



Trust

Do the right thing and own it!

Excellence

Be proud of what we do and constantly reimagine great.

Service

Empathize and serve others.

Innovation

Explore and be curious.

This Ethics Guide was crafted with these values in mind and is central to our everyday behaviors. Our values should be embedded in everything we do and inform the way we work.

ETHICS

“The time is always right to do what is right.”
- Martin Luther King Jr.

INTRODUCTION

Delta Dental is committed to excellence and integrity in all of our business activities. We conduct business in a manner designed to maintain and promote the honor associated with the Delta Dental name.

Our team members must refrain from illegal and unethical conduct, and support and follow both the language and the spirit of the law. You should be open and honest in your business relationships with all team members and other professionals retained by Delta Dental.

Honesty requires disclosing all information that is relevant to a given issue. You should avoid the appearance of impropriety in conducting business; business conduct has the appearance of impropriety if a reasonable person might conclude that the behavior raises ethical questions.

QUESTION & ANSWER

Watch for these boxes throughout this document. These serve as roadmaps for making ethical decisions. We will lead you through the thought process of making difficult choices and help you anticipate the potential consequences of your actions.



An article in The Ethisphere® Institute's publication put it best: "*Whatever your view on causation, the correlation is clear: businesses with strong governance practices, better ethics and compliance programs, more committed cultures and a broad engagement with their communities have better business outcomes and higher shareholder returns.*"¹

¹ A Clear Correlation: Ethical Companies Outperform, E.S. Byrne, June 9, 2017,

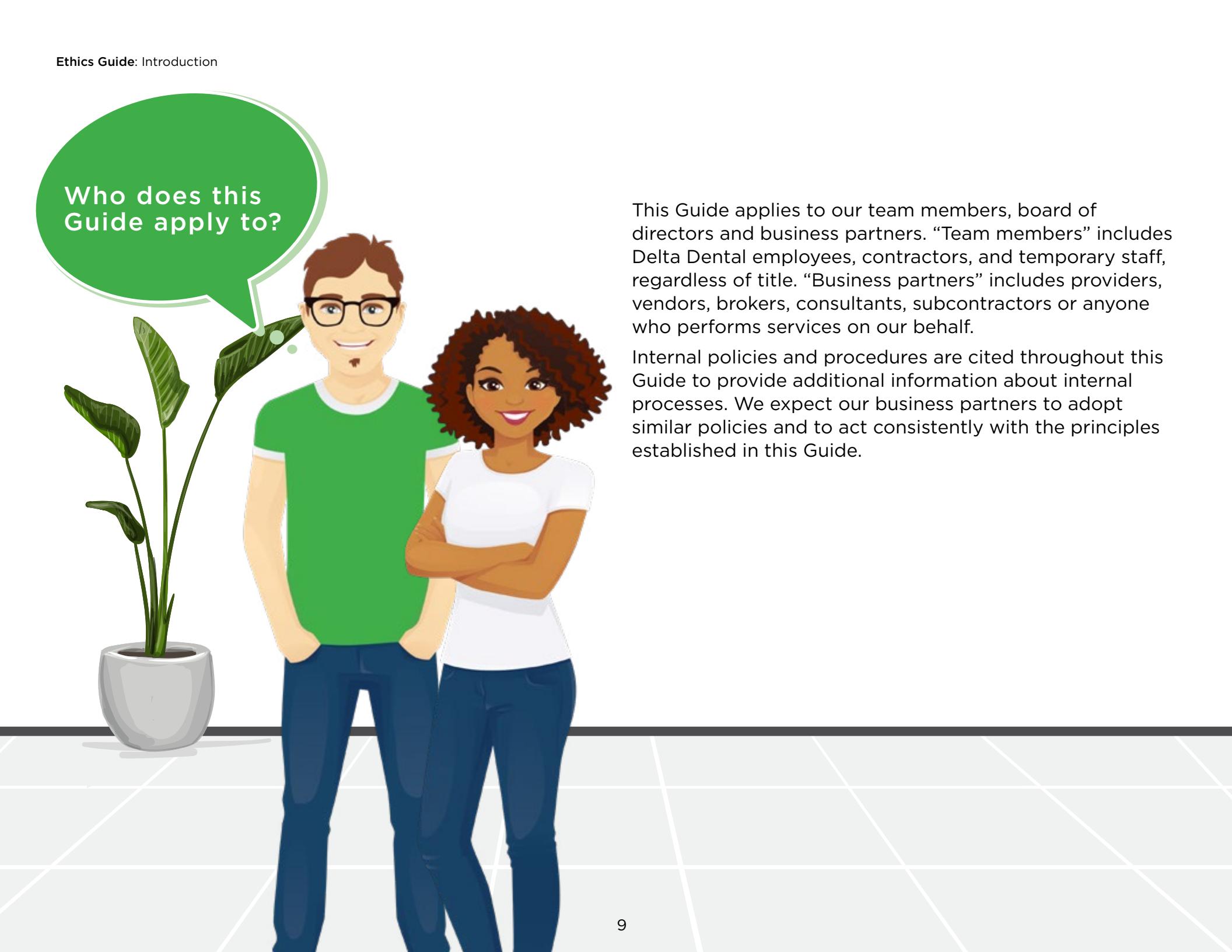


How do we ensure we are acting ethically?

In any given situation, we recognize that no set of standards or procedures can substitute for personal integrity, good judgment and common sense. Although expectations may be described in our policies and this Guide, this decision tree can help you in handling difficult situations.

If you can't comfortably answer "yes" to each of these questions, you should stop and seek advice from your manager, Human Resources or the Department of Risk, Ethics and Compliance.

1. Is it legal?
2. Does it comply with company policy? With this Guide?
3. Have I considered the impact to our customers, team members and the company?
4. Would I feel comfortable explaining my actions to my colleagues, manager and family?
5. Could I defend my actions if they appeared in a newspaper or in a social media post?
6. Does it benefit the company as a whole, not just certain individuals?
7. If I'm unclear about something, have I asked the right person for advice?



Who does this Guide apply to?

This Guide applies to our team members, board of directors and business partners. “Team members” includes Delta Dental employees, contractors, and temporary staff, regardless of title. “Business partners” includes providers, vendors, brokers, consultants, subcontractors or anyone who performs services on our behalf.

Internal policies and procedures are cited throughout this Guide to provide additional information about internal processes. We expect our business partners to adopt similar policies and to act consistently with the principles established in this Guide.

RAISING CONCERNS

“Only by speaking out can we create lasting change.”

-DaShanne Stokes



The effectiveness of this Guide is dependent upon our team members complying with its guidelines, the spirit of those guidelines and the individual judgment each team member must make when faced with their own or others' decisions. To be most effective, it is also critically important that team members report any known or suspected violations of this Guide **immediately** and participate in their resolution. **No one will be subject to retaliation because of a good-faith report of suspected misconduct.**

Reporting

It is in Delta Dental's interest to ensure that any reports of non-compliance with this Guide are properly investigated and acted upon in a timely fashion.

- All reports will be handled in a manner protecting the privacy of the person making the report.
- All reports will be investigated in a timely manner, normally within 30 days of receipt.
- All reports will be investigated by people trained and experienced in conducting investigations.
- Appropriate disciplinary action in response to substantiated allegations will occur.

Known or suspected violations of any policies associated with this Guide must be brought to the attention of our **Chief Compliance Officer**.



There are several reporting options available to you:



In person

Talk to your manager or a Human Resources representative: HRMailbox@delta.org



Compliance & Ethics Helpline

Call: (833)DD-REPORT or (833)337-3767

Online: www.lighthouse-services.com/deltadental

Email: reports@lighthouse-services.com



Compliance Officer

ComplianceOfficer@delta.org



Write

Delta Dental of California
560 Mission Street Suite 1300
San Francisco, CA 94105
Attn: Compliance Officer



Questions

Contact the Department of Risk, Ethics and Compliance with questions:

DepartmentRiskEthicsandCompliance@delta.org

Any report should contain the date, name of the submitter (unless anonymous) and a summary of the alleged violation(s). A copy of the procedure for how the report will be handled [can be found here](#).

Disciplinary Action

Delta Dental will take appropriate disciplinary action for violations of this Guide, company policy and/or the law, up to and including termination. Certain violations also may be violations of the law and could lead to individual criminal prosecution, resulting in fines and/or imprisonment. For more information about the company's disciplinary process, refer to the [Workforce Discipline and Sanctions for Compliance Violations Policy](#) and the [Discipline Procedure](#). Any additional questions about this Guide can be addressed directly to the Department of Risk, Ethics and Compliance, the Compliance Officer or your manager.



QUESTION & ANSWER

Can I report my concern anonymously?

You can file a report anonymously online or by calling the helpline. The webpage is hosted by a third-party provider, and the information you provide will be sent to us on a totally confidential and anonymous basis if you choose. Similarly, the helpline is answered by agents not affiliated with Delta Dental.

Manager Responsibilities

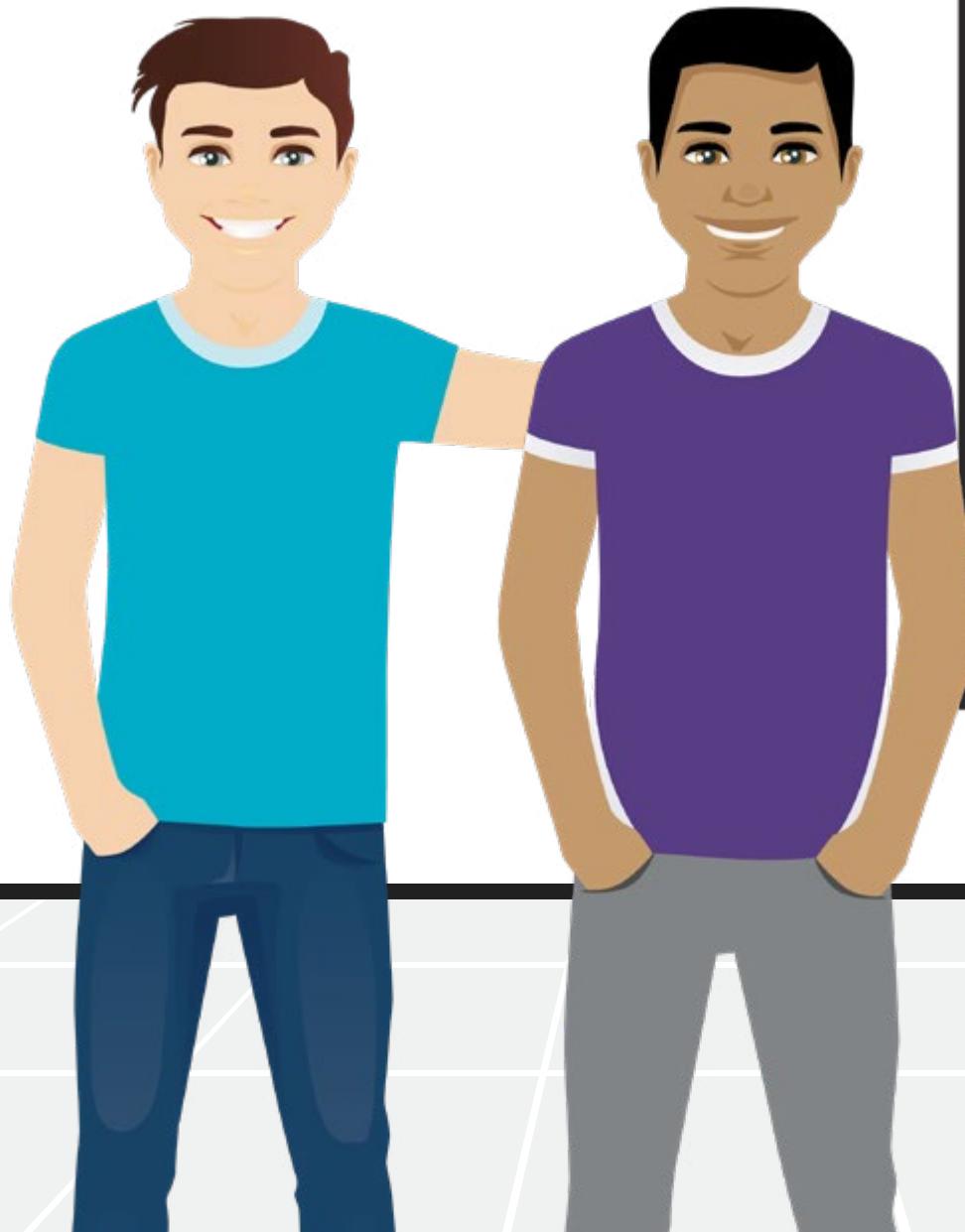
Managers and supervisors have leadership responsibilities that include creating a culture of high ethical standards and commitment to compliance, maintaining a work environment that encourages team members to raise ethical concerns and promptly addressing those concerns. Managers are responsible for reporting improper conduct. They are expected to escalate concerns, reports and allegations. Failure to properly report issues and concerns may result in disciplinary action. Managers must never take or permit any retaliatory action against someone for making a good-faith report.

Non-Retaliation/Whistleblower Protection

Please be assured you will not be subject to reprisals of any kind for reporting violations. Delta Dental does not tolerate retaliation or intimidation against any team member's good-faith participation in the compliance and ethics program, whether that be reporting potential issues, or participating in audits and investigations.

Delta Dental will protect team members from retaliation and intimidation. If you believe you or someone else is experiencing adversity or are intentionally being caused feelings of fear or inadequacy based on issues addressed in this Guide or otherwise, please report it to the Compliance Officer immediately.





QUESTION & ANSWER

Is it okay to address an issue on my own in order to keep a coworker from getting in trouble?

No. If you suspect someone of violating this Guide, you should report it to a manager or via one of the methods listed in this Guide. Reporting concerns helps us learn of different types of misconduct that could occur. If concerns aren't reported, steps can't be taken to prevent misconduct from happening in the future.





Waiver Provision

This Guide was duly adopted by the Board of Directors after review and recommendation for passage by the Audit Committee on September 6, 2018. Proposals for amendments to this Guide will follow the same process as for its adoption. This Guide does not explicitly cover all conceivable situations or circumstances; however, the Company reserves the right to apply the parameters outlined in this Guide to situations and circumstances arising which, in its sole discretion, fall within the spirit and intent of the Guide.

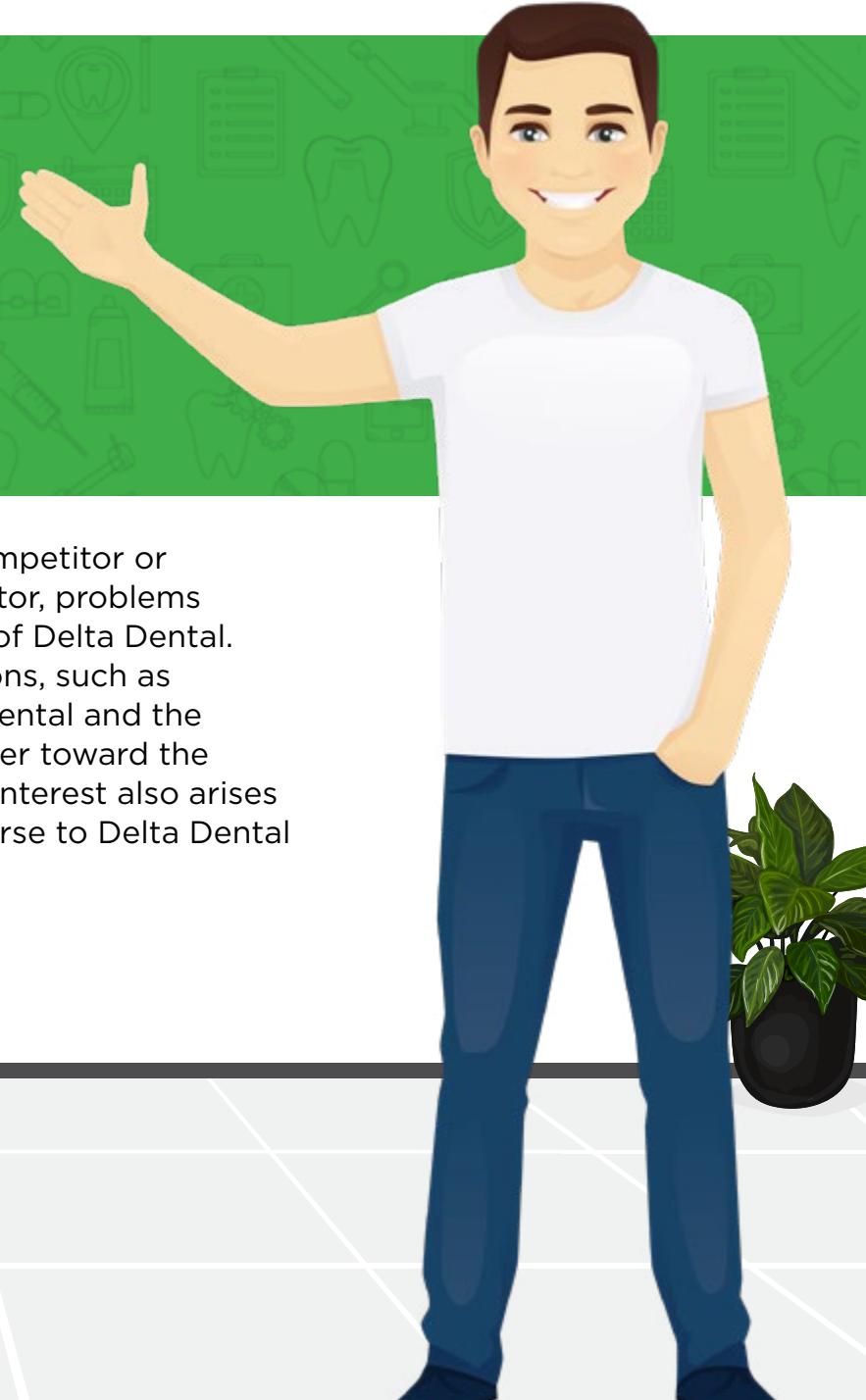
CONFLICTS OF INTEREST

When in doubt, disclose.

Delta Dental considers conflicts of interest a serious matter. Everyone assumes a basic duty of loyalty to our company. Because of this, you should:

- Refrain from activities which may compromise that duty
- Disclose any possible conflicts of interest to Delta Dental

Conflicts of interest arise when a team member is associated with a competitor or other organization. When a team member is associated with a competitor, problems arise because the business goals of the competitor conflict with those of Delta Dental. In addition, when a team member is associated with certain organizations, such as regulatory agencies or dental societies, problems might arise if Delta Dental and the other organization are not legally or ethically permitted to work together toward the same goal — or if they have different or conflicting goals. A conflict of interest also arises whenever a team member has an independent self-interest that is adverse to Delta Dental for any reason.





QUESTION & ANSWER

Can I sit on the board of another company?

You should inform your manager and contact the Legal Department to receive guidance before accepting a position on another company's Board. Things that will be considered are: the type of company, the services it provides and any impact it may have on your responsibilities at Delta Dental.

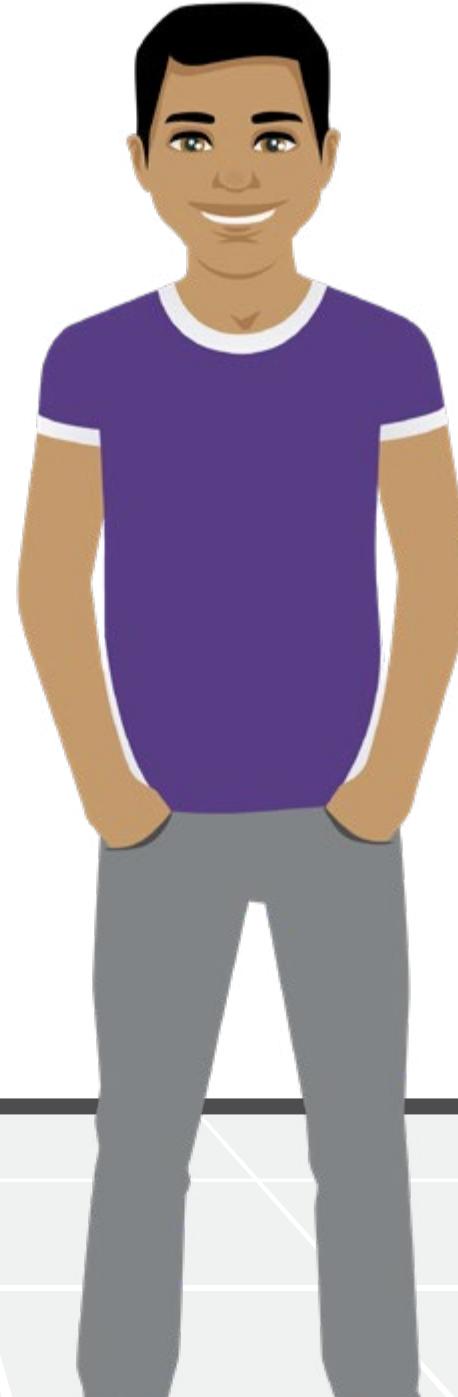


Because of the potential risks and liabilities that could arise from business circumstances impacted by a conflict of interest, Delta Dental requires all employees, officers and members of the Board of Directors to disclose any possible conflict of interest to your management. The following are conflicts of interest that warrant disclosure to management:

- Being in an employer-employee relationship, or other relationship involving commitment or trust with a competitor organization. Such organizations include, but not limited to, entities selling or administering dental benefit programs, including brokers and direct competitors to Delta Dental. This conflict would also exist if a team member had any direct financial interest, such as stock ownership, in a competitor organization.
- Being in an employer-employee relationship, or any other relationship involving commitment or trust, with an organization whose interests may bear upon or converge with those of Delta Dental. Examples include affiliation with a regulatory agency, a Delta Dental customer or supplier, or state or local dental societies.

- Entering into any other contract, transaction, activity, employment or other relationship involving commitment or trust that would impair in any way the employee's ability to perform the duties of his or her job with Delta Dental in good faith.
- Any other situation where the team member is in a position to act contrary to Delta Dental's interests.

Delta Dental considers these situations conflicts of interest not only when they involve team members directly, but also if a team member's spouse, domestic partner, significant other immediate family member or relative, and any person with whom the team member shares living quarters, has any affiliation with a competitor organization as described above. Examples include an affiliation with a Delta Dental customer, supplier, provider or consultant, a state agency involved in the regulation of insurance or health-related matters, or connection to state or local dental societies.



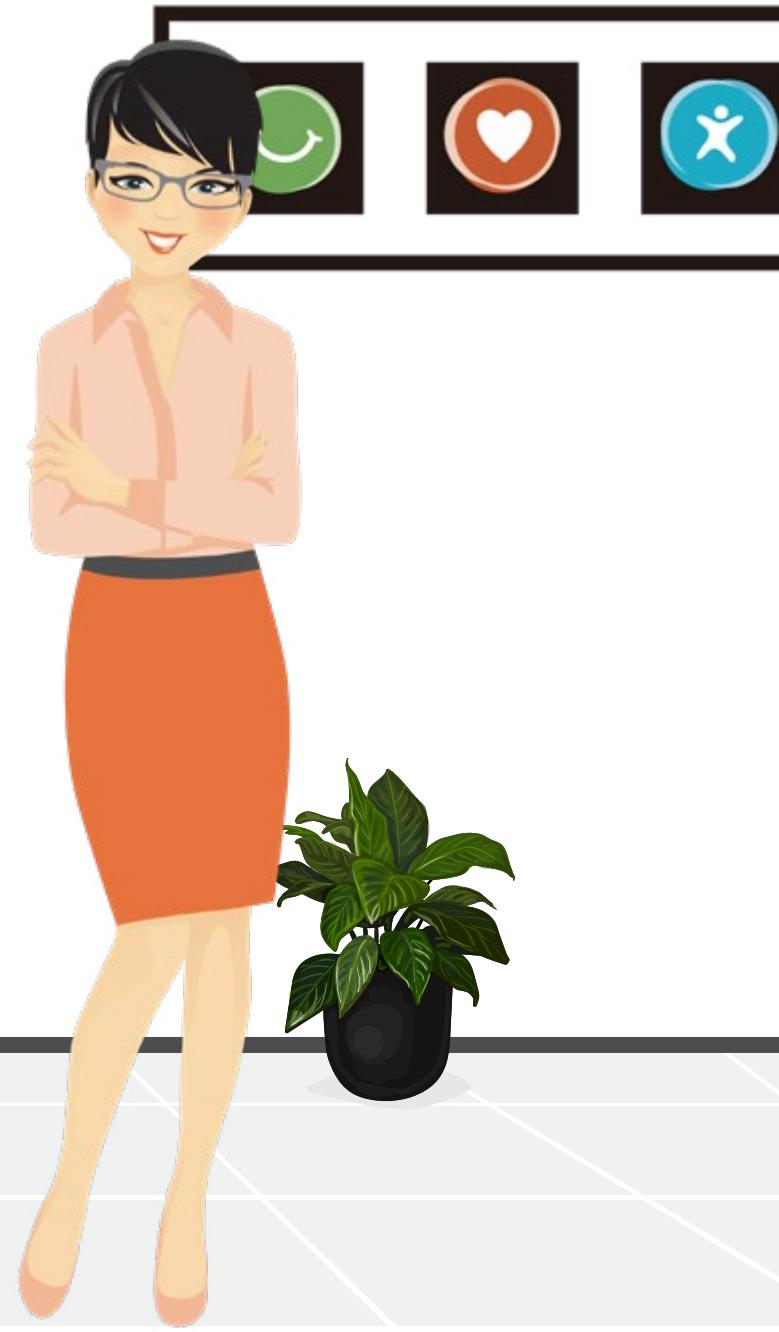


Examples of companies selling dental insurance that are in daily competition with Delta Dental include Blue Shield/Blue Cross, Aetna, Cigna, Met Life, Prudential, UCCI, Guardian and Travelers. Affiliations such as these create problems because Delta Dental and the other organization may not be legally or ethically permitted to work together toward a particular goal or to have the appearance of a close-knit relationship.

Conflicts sometimes can arise without the design or agreement of the team member, or organizations not previously in conflict can later become so. Also, regardless of whether the team member considers two particular loyalties to be in conflict, the very appearance of the conflict is still grounds for concern.

It's your responsibility to report an actual or potential conflict in which you are involved to management. It is better to try to work out a solution with management when an actual or potential conflict arises, rather than face possible disciplinary action for violation of the policy after the fact. In such a situation, the fact that management was not informed may appear purposeful, thus complicating management's decision.

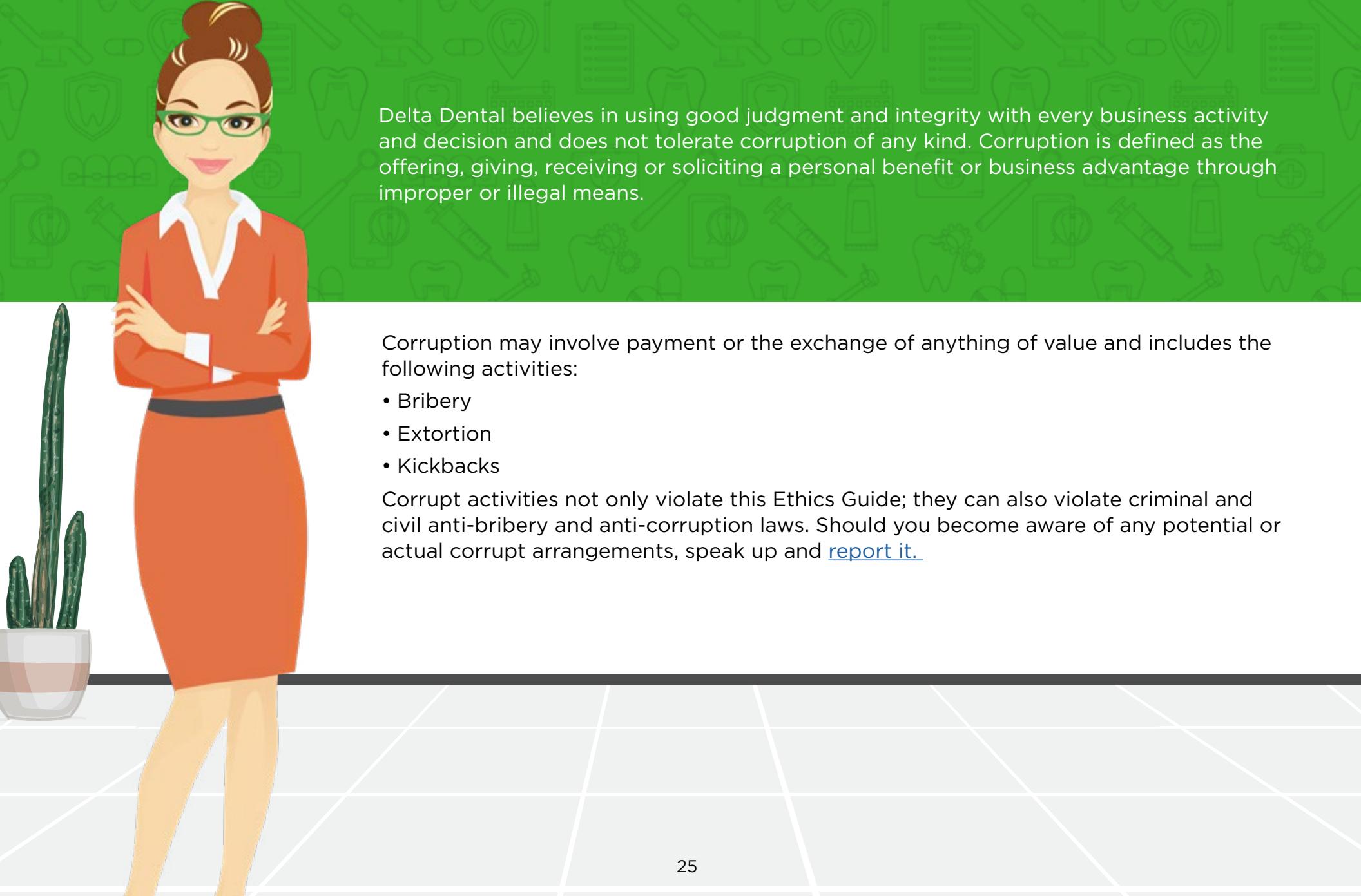
Once a potential conflict has been brought to management's attention, management will investigate the matter. They will then determine whether an actual conflict exists, and if so, develop an appropriate solution for the circumstances of the individual case.



ANTI-CORRUPTION

“Integrity is doing the right thing, even when no one is watching.”

- C.S. Lewis



Delta Dental believes in using good judgment and integrity with every business activity and decision and does not tolerate corruption of any kind. Corruption is defined as the offering, giving, receiving or soliciting a personal benefit or business advantage through improper or illegal means.

Corruption may involve payment or the exchange of anything of value and includes the following activities:

- Bribery
- Extortion
- Kickbacks

Corrupt activities not only violate this Ethics Guide; they can also violate criminal and civil anti-bribery and anti-corruption laws. Should you become aware of any potential or actual corrupt arrangements, speak up and [report it](#).

The illustration shows a woman on the left and a man on the right, both standing in an office environment. The woman has dark hair and glasses, wearing an orange cardigan over a yellow top and an orange skirt. The man has a beard and is wearing an orange sweater over a white shirt. They are positioned in front of two large, framed panels. Each panel features a green speech bubble containing the text "QUESTION & ANSWER". The left panel contains the question "What is a ‘kickback’?" and the answer: "A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given or ‘kicked back’ to the purchaser in exchange for making the deal. For example, a kickback might involve a vendor who offers a Delta Dental team member a monthly payment equaling 5% of Delta Dental’s purchases as an incentive to the team member to retain the vendor’s services." The right panel contains the question "What is a ‘anything of value’?" and the answer: "‘Anything of value’ is very broad and could include goods or services, such as gift cards, event tickets, entertainment, free airfare, travel perks, use of vacation homes, special favors or privileges, donations to designated charities, discounts, free personal services, financial or property loans, or a promise of future employment."

QUESTION & ANSWER

What is a “kickback”?

A kickback is a form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given or “kicked back” to the purchaser in exchange for making the deal. For example, a kickback might involve a vendor who offers a Delta Dental team member a monthly payment equaling 5% of Delta Dental’s purchases as an incentive to the team member to retain the vendor’s services.

QUESTION & ANSWER

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“Anything of value” is very broad and could include goods or services, such as gift cards, event tickets, entertainment, free airfare, travel perks, use of vacation homes, special favors or privileges, donations to designated charities, discounts, free personal services, financial or property loans, or a promise of future employment.

ACCEPTING GIFTS

If you wouldn't want your acceptance of the gift on the 6 o'clock news, then you probably shouldn't accept it.



You must not directly or indirectly solicit or accept any fee, commission, entertainment, gift, gratuity, property, discount, or loan for yourself, family members or affiliates as compensation for performing duties for Delta Dental - or making or causing Delta Dental to make - any business decision.

You may accept reasonable business gifts of nominal value in the ordinary course of employment, not to exceed \$100. You may attend business lunches, dinners and similar outings (e.g., sporting events, golf, theatre, shows, etc.) conducted in the normal course of business which are neither so frequent nor so excessive as to raise any question of propriety.



The image shows two whiteboards mounted on a wall. A potted plant is positioned between them on a tiled floor. The whiteboard on the left has a green speech bubble at the top containing the text "QUESTION & ANSWER". Below it is a question: "Can the gift be given openly or in a public setting? If not, the gift may not be appropriate." Underneath that is another question: "Do you feel obligated to give the person your business by accepting the gift? Are you expecting something in return from the person you are giving the gift to? If so, STOP! There should be no expectations from either party, stated or implied, when gifts are given." The whiteboard on the right also has a green speech bubble at the top containing the text "QUESTION & ANSWER". Below it is a question: "Is the gift lavish or is it given frequently? Gifts that are given repeatedly can be perceived as a conflict of interest or bribery." Underneath that is a concluding statement: "If you have any doubt regarding acceptable gift giving and/or receiving, discuss it with your manager or the Compliance Officer. Remember, if you don't feel comfortable, then it is likely that accepting or giving the gift is a bad idea."

GIVING GIFTS

Giving and receiving gifts must never be a quid pro quo for any past, present or future act or decision.

Except as authorized by the terms of contractual arrangements with Delta Dental, no fee, commission, property, or any other compensation may be offered or paid directly or indirectly by team members to, for or on behalf of any existing or potential customer, competitor or supplier of Delta Dental for the purpose of influencing any transactions involving or affecting Delta Dental business.

You may provide reasonable business gifts, not to exceed \$100, and may provide business lunches, dinners and similar outings (e.g., sporting events, golf, theatre, shows, etc.) conducted in the normal course of business which are neither so frequent nor so excessive as to raise any question of propriety. If you are unsure that a gift is appropriate, you should consult with your manager or the Department of Risk, Ethics and Compliance.





QUESTION
& ANSWER

Auditors will be on site to review our business area. Can I offer to take them to lunch?

There are special rules in the U.S. that make it illegal to offer gifts and hospitality to government employees. Even if the auditors are not government employees, certain actions can be viewed as bribery. To be safe, consult with the Department of Risk, Ethics and Compliance.

ANTITRUST AND FAIR COMPETITION

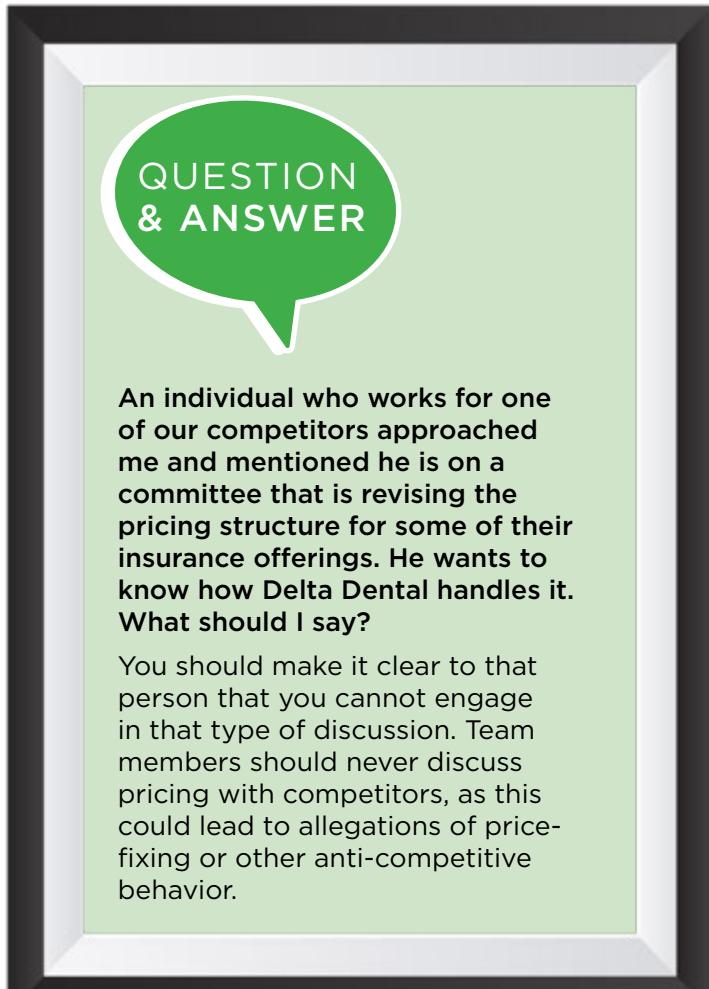
Assume all non-public company information is confidential.



Delta Dental honors free and open competition centered on honesty and equality. Competition laws, also known as antitrust, are designed to promote fair competition for the benefit of consumers. To comply with competition laws, we never do the following:

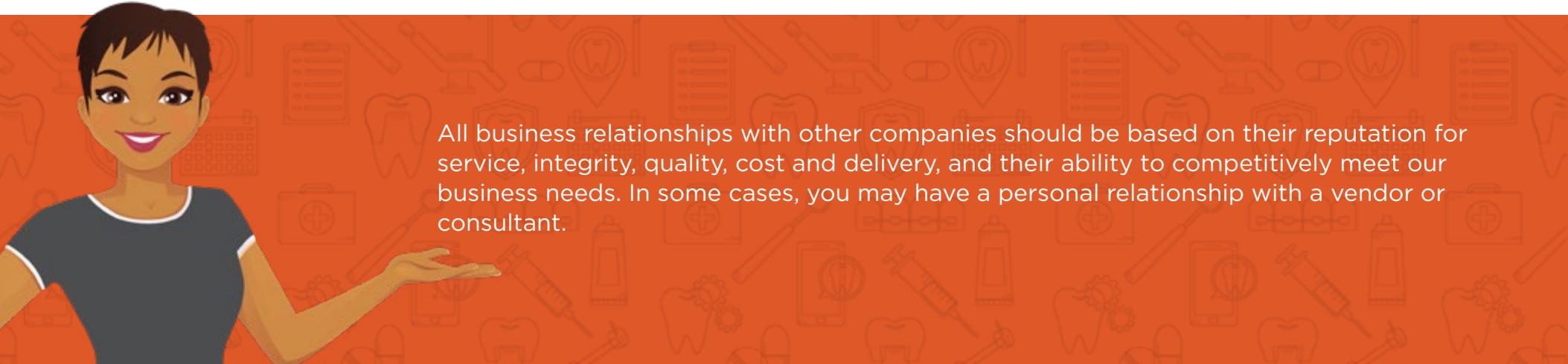
- Fix prices, premiums or the terms and conditions of the products we sell
- Agree to refuse to do business with customers, providers or other competitors
- Conspire with our competitors by distributing our customers, enrollees or sales territories in an attempt to limit open competition.

If a competitor tries to discuss prices, products or services, or the territories in which we do business, please do not engage. We want to avoid even the appearance that any of our pricing or business decisions are influenced by information exchanged with competitors. Violation of these laws can lead to severe penalties, both civil and criminal, both for team members involved and for Delta Dental. If you believe fair competition laws have been violated, [report it](#) immediately.



SELECTION AND USE OF THIRD PARTIES/ PROCUREMENT

Is it an arm's length transaction, with fair and reasonable terms?



All business relationships with other companies should be based on their reputation for service, integrity, quality, cost and delivery, and their ability to competitively meet our business needs. In some cases, you may have a personal relationship with a vendor or consultant.

Such relationships have the potential to create a conflict of interest. For example, you might have a family member who works for one of our vendors, or your former employer might be one of several companies under consideration to become a consultant for Delta Dental. In order to avoid even the appearance of improper behavior, you should disclose any personal relationships of this kind immediately.





QUESTION & ANSWER

My brother-in-law owns a consulting firm that has a lot of expertise in a business area we are targeting. Can I recommend his company to work for Delta Dental?

You can recommend your brother-in-law's company for consideration; however, you must disclose your relationship at the time you make your recommendation. You may not be involved in the bidding or negotiation process, nor may you use your position in the company to influence those involved in the procurement process.

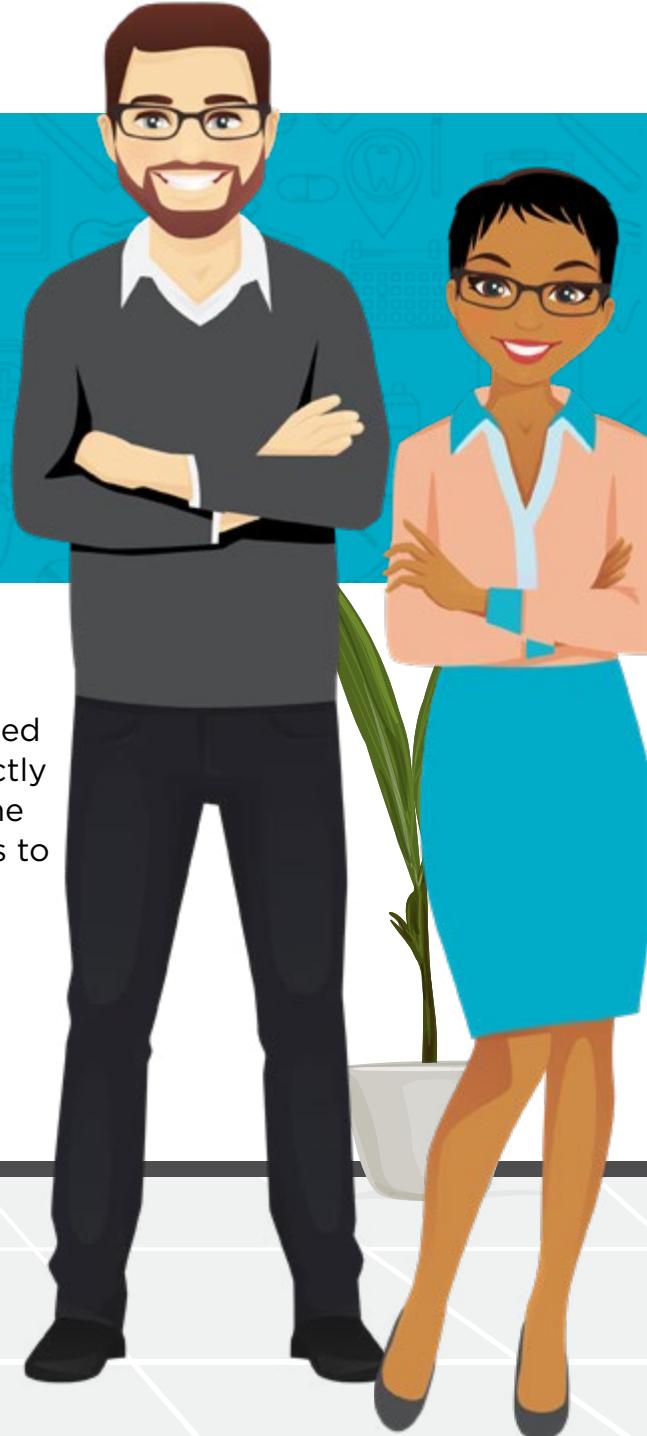
COMPLIANCE WITH LAWS AND REGULATIONS

“If you think compliance is expensive, try non-compliance.”

- Former U.S. Deputy Attorney General Paul McNulty

Delta Dental is committed to conducting its business in compliance with all applicable laws, rules and regulations. Our organization conducts business in all 50 states plus D.C., Puerto Rico, the Virgin Islands, and Mexico and participates in federal exchanges and federally and state-funded programs such as Medicare and Medicaid. As such, we are subject to various state and federal laws and are accountable to those regulatory agencies.

Our Board of Directors (BOD) has established an Audit Committee and delegated oversight of auditing and compliance functions to this Committee. We have a designated Chief Legal Officer and Chief Compliance Officer. The Compliance Officer reports directly to the Chief Executive Officer (CEO) and provides unfiltered reports to the CEO and the Audit Committee on compliance risk areas, audit and enforcement activities, strategies to address these, and the results of these implementations.



Delta Dental has also designated an Executive Compliance Committee (ECC) that is chaired by the Chief Compliance Officer and consists of senior leadership with oversight over various operating areas. During the meetings, compliance risk areas are discussed, including, but not limited to, those areas that impact the Medicare Advantage line of business. Results from these meetings lead the ECC to advise on action plans to monitor and control risks. When gaps are identified, we work to close them and follow up to ensure that the modified controls are fully implemented.



ACCURATE BOOKS AND RECORDS

“The truth of the matter is that you always know the right thing to do.
The hard part is doing it.” – General H. Norman Schwarzkopf



Whether you have prepared a timesheet, created an expense report, or approved an invoice, each of us contributes in some way to Delta Dental's financial statements, books and records. We are required to maintain and provide full, accurate, timely, and transparent reporting of information about our company and operations. Therefore, every business record we create and approve must be accurate, complete and reliable.

We have adopted specific practices to ensure that we make full, accurate and timely disclosures in our filings with regulators, and comply with our obligations under the law. Making or approving false or misleading records or documentation, or failing to properly disclose relevant items, undermines our ability to make good decisions and is strictly prohibited.

We must never do any of the following:

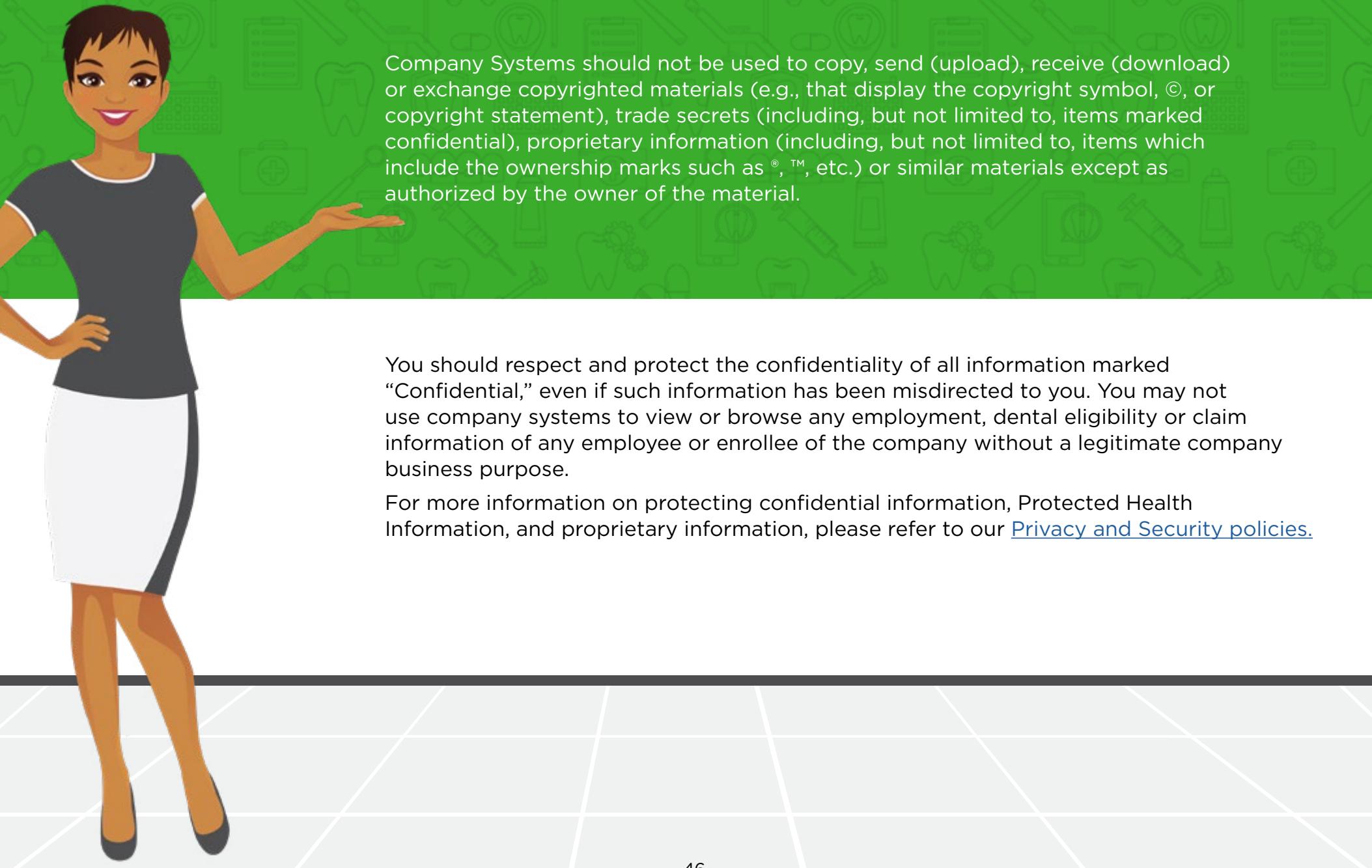
- Intentionally create false or misleading entries or records
- Knowingly fail to make correct entries on any company record or document
- Guess at an answer on a document
- Omit or conceal relevant information

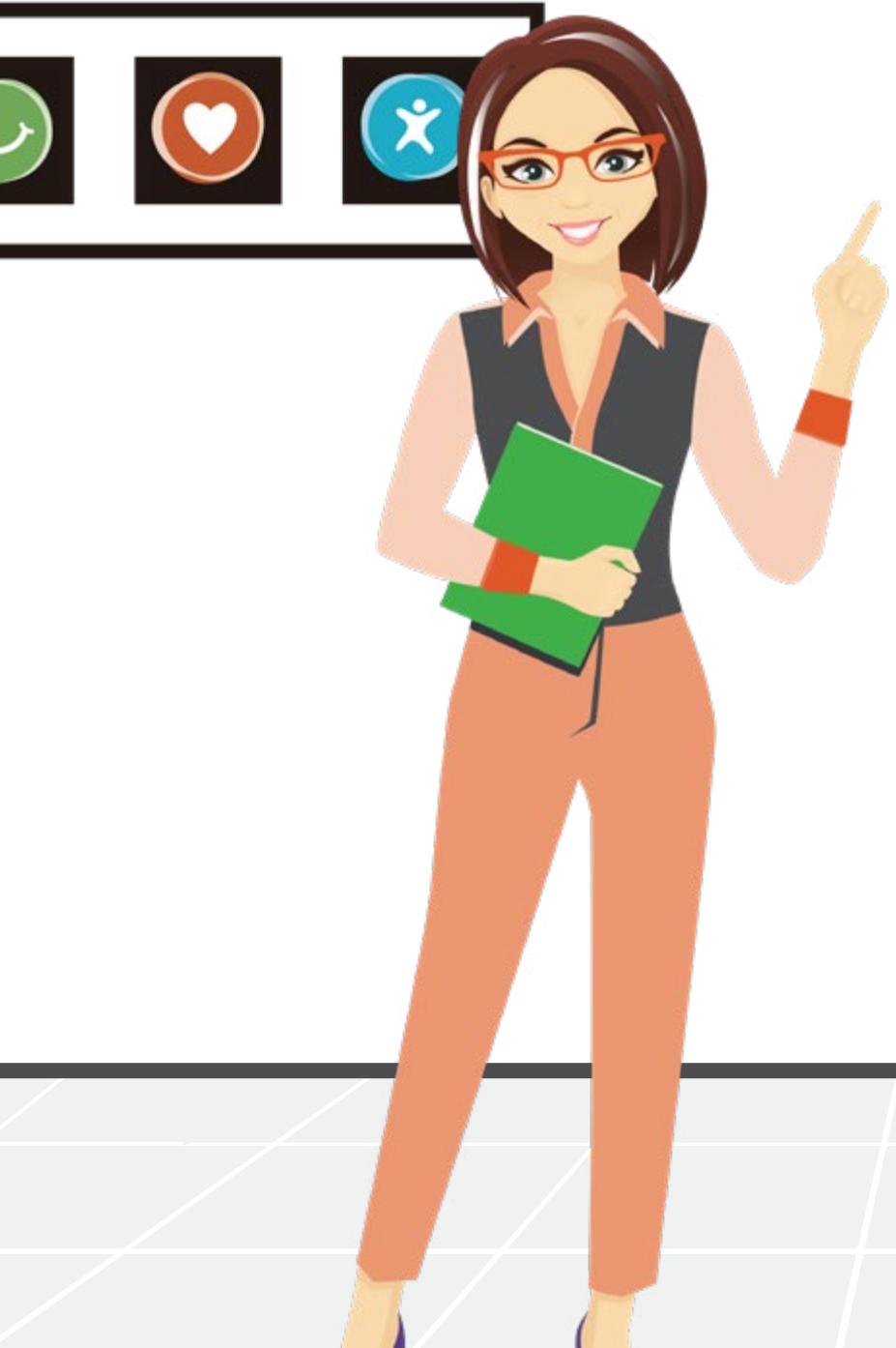
The integrity of our internal controls and procedures is only as strong as our culture of open communication and honesty. If you have concerns about any aspect of our financial reporting or any accounting, audit or internal control issues, you should report them to your manager or using any of the methods listed in the [reporting section](#).



INTELLECTUAL PROPERTY/ CONFIDENTIAL INFORMATION

It's like the adage "*What happens in Vegas, stays in Vegas*"...only stronger.



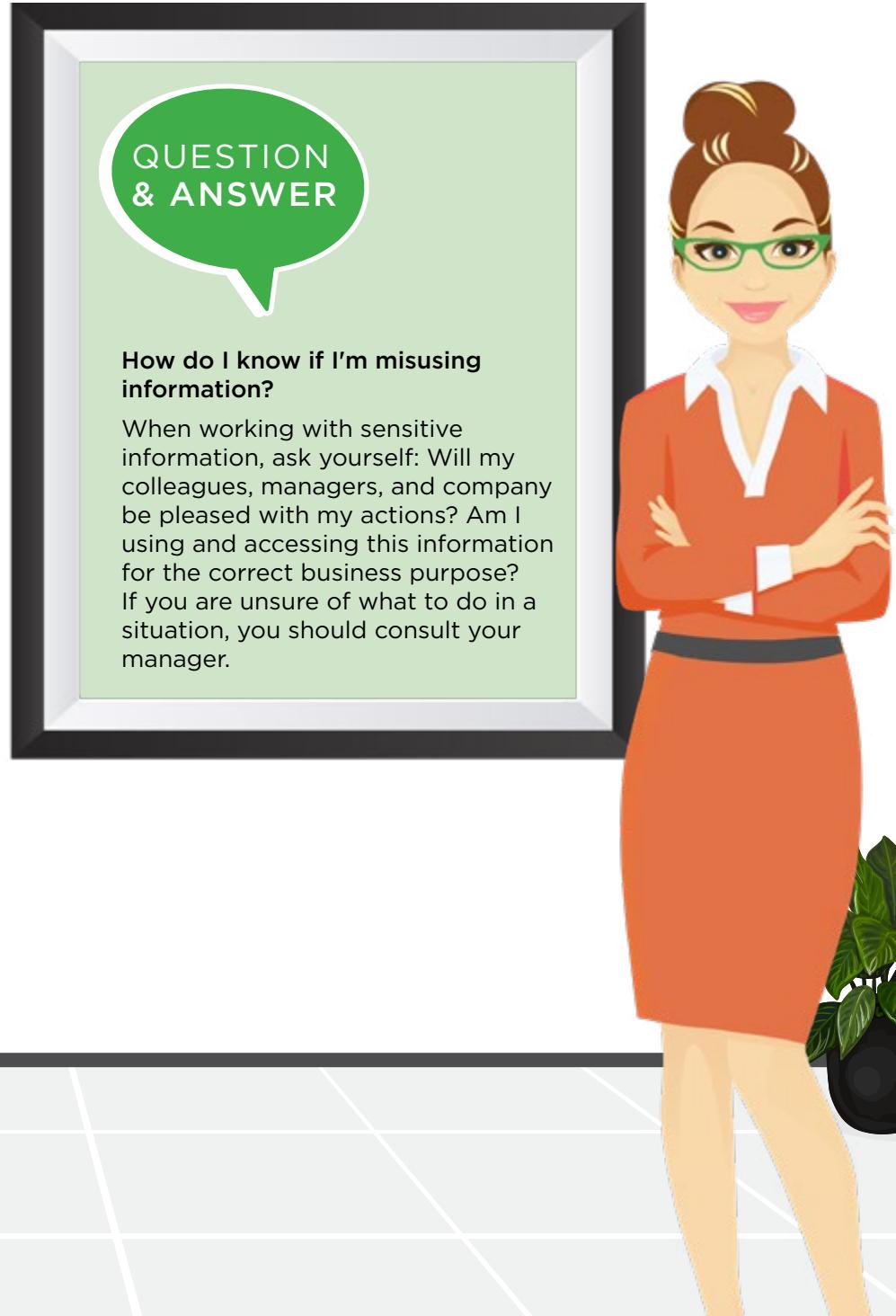


Data Privacy

Delta Dental is committed to protecting the private information of our customers, business partners and team members. Everyone must take appropriate actions to mitigate risks to the privacy and security of any confidential information to which they have access. Confidential information is information that is restricted to individuals whose job functions require access. Confidential information is not made available outside of the company without appropriate Data Owner approvals/ business agreements.



Protected Health Information (PHI) or Personally Identifiable Information (PII) represents subsets of confidential information. PHI relates to the past, present, or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present or future payment for the provision of health care to an individual. PII is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. For more information about PHI and PII, refer to the [Privacy & Security Glossary](#).





You should apply the following safeguard practices when dealing with confidential information:

Minimum necessary

You may not access information you are not authorized to view for business or legal reasons. Only communicate the minimum amount of confidential information necessary to accomplish the assigned task.

Awareness of place and content

When discussing confidential information, be aware of your surroundings. Determine whether a confidential discussion is appropriate in that environment.

Computer systems

Keep confidential information on company servers and refrain from copying files to your desktop or saving them on your computer's local hard drive. When stepping away from your computer, it must always be locked. Passwords and other access credentials must be kept private.

Printing

Consider your need for hard copies before printing, and only print confidential information when absolutely necessary. Documents should be picked up from printers right away.

Paper materials

Confidential information should be locked up at the end of the work day or when leaving your work area for breaks, lunches and meetings.

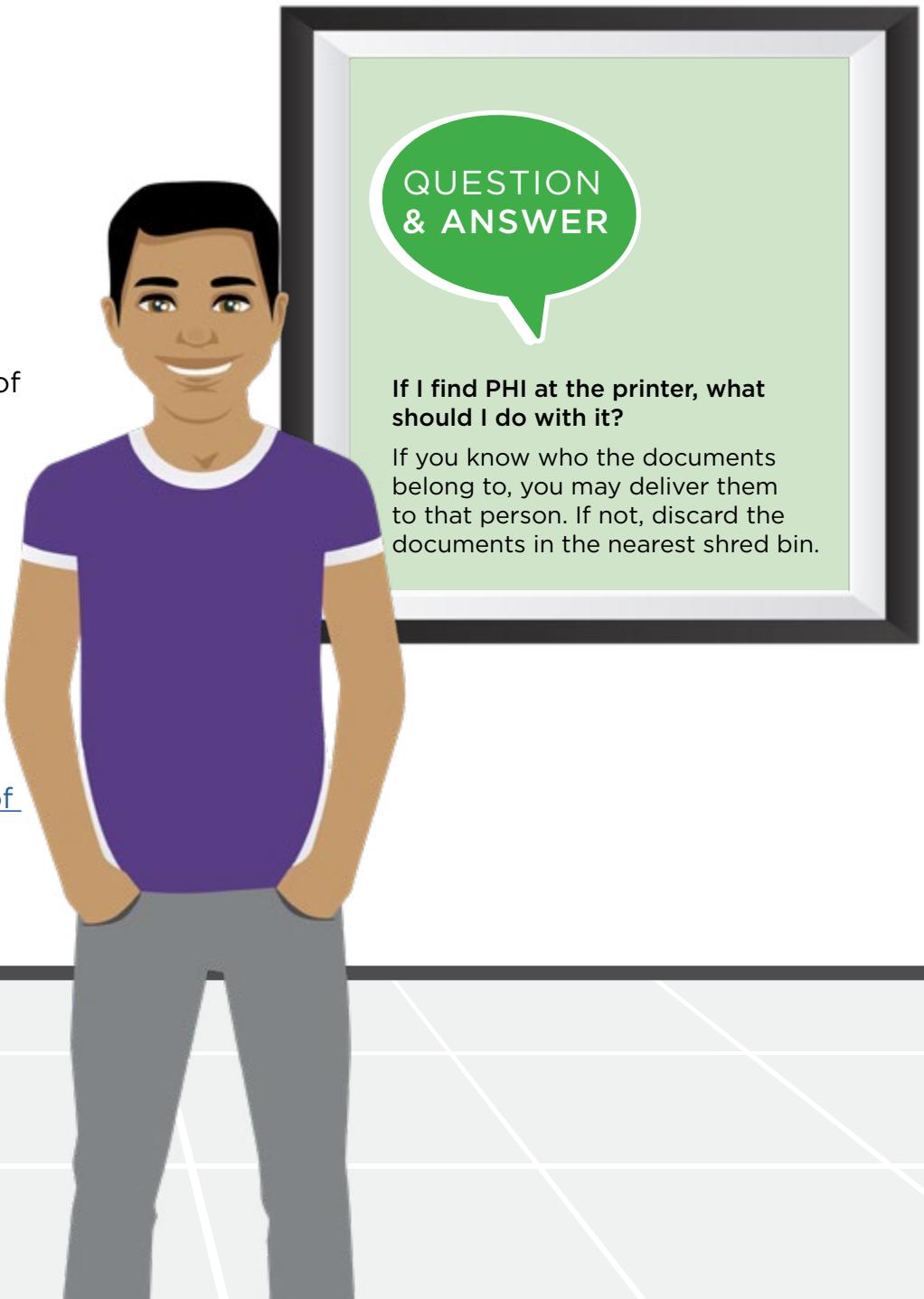
Destruction

Delta Dental employs vendors to safely dispose of confidential materials. You should use the appropriately labeled shredding bins.

Email

When sending email, ensure that recipients' email addresses are correct.

For more information, refer to Delta Dental's [Protection of Confidential Information in the Workplace Policy](#).



Records Management

Delta Dental is also committed to effective records management including meeting legal and operational requirements for record retention and disposal, privacy and confidentiality protection, optimizing the use of space, minimizing the cost of record retention and properly destroying outdated records. Our practice is to assess information, designate which information to retain as a company record, categorize it, protect it and dispose of it at the end of the record life cycle. Information that is of business value and reflects the decisions and transactions of the company must be designated as a record. At the end of the records retention period, the records must be completely destroyed, including all backup and duplicate copies, ensuring that information is no longer retrievable or useable. For more information, please refer to [Delta Dental's Record Management portal page.](#)



PHYSICAL ASSETS

Protecting our physical assets helps improve our company's security.



Delta Dental protects our company assets so we can better perform our jobs and serve our customers. Delta Dental's assets – whether they are computers, equipment, supplies, confidential information, team member time or other physical and intellectual property – are meant to be used for the benefit of the company.

These assets are not for personal gain or for the benefit of others outside of Delta Dental. It is your responsibility to keep our assets safe from loss, theft, damage, inappropriate use or other forms of abuse or fraud. If you suspect theft in the workplace, or if you become aware of misuse of company assets, [report it immediately](#).

Computer Use

You are given access to computers and computer systems to help you perform your job. Do not expect that anything you create, store, send or receive on company owned computers – regardless of its relation to Delta Dental business – will be private. Without prior notice or consent, Delta Dental may retrieve, review or disclose any material created, stored, sent or received on its computers, through the internet or any other computer network.

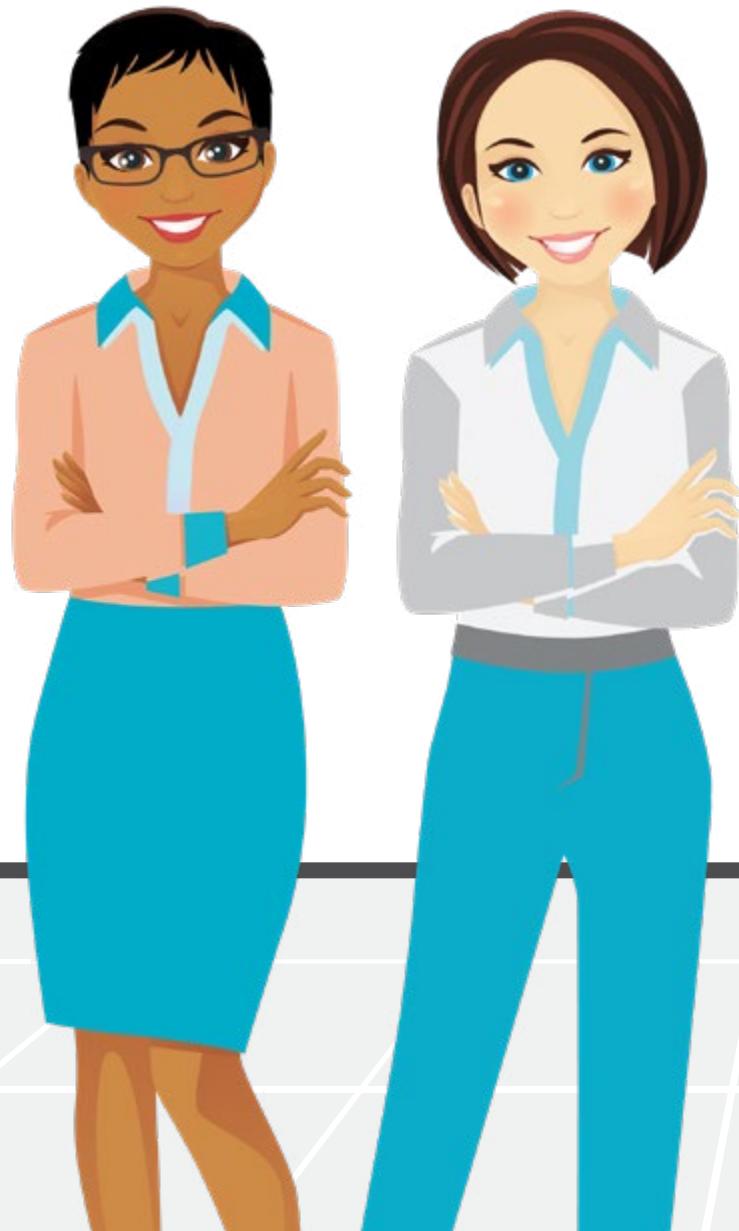
Delta Dental strictly prohibits using any of its computer resources for any of the following:

- Sending, receiving, downloading, displaying, printing or otherwise disseminating material that is sexually explicit, racially offensive, profane, obscene, harassing, fraudulent, defamatory or unlawful.





- Disseminating or storing destructive programs (that is, viruses or self-replicating code), political or religious endorsements or solicitations or any other unauthorized material.
- Wasting computer resources by sending mass mailings, spending excessive amounts of time on the internet, playing games, engaging in online chat groups, unnecessarily printing multiple copies of documents or creating unnecessary network traffic.
- Using or copying software in violation of a license agreement or copyright. Only software properly licensed and approved may be loaded onto Delta Dental computers.
- Upon resignation or termination, destroying, removing, copying or deleting any information, files or messages stored on any Delta Dental equipment.



QUESTION
& ANSWER

What are examples of misusing company assets?

Taking office supplies for personal use, submitting personal expenses on company expense reports, falsely reporting time worked, or presenting false information to receive health and disability benefits from Delta Dental.

COMMUNICATING WITH EXTERNAL PARTIES

Once it's out there, you can't take it back.



Media and legislative inquiries may include in-person, mail, e-mail and/or telephone communications from anyone identifying him or herself as a news reporter, journalist, freelance writer, editor or an elected official, or an elected official's staff member, who requests information for any reason other than routine inquiries related to their enrollment under a company-sponsored benefit program.

All incoming requests are to be forwarded immediately to Marketing and Communications. This includes media and/or legislative inquiries received by any company-affiliated office, as well as requests for interviews. For more information, please refer to the [Media Relations & Public Affairs Policy](#).

With the exception of Marketing and Communications staff, and designated Legal and Senior Executive Staff, any team member interacting with a member of the media or legislature should politely decline to comment or release any information prior to reporting the contact to Marketing and Communications staff and receiving authorization and direction on appropriate communications.

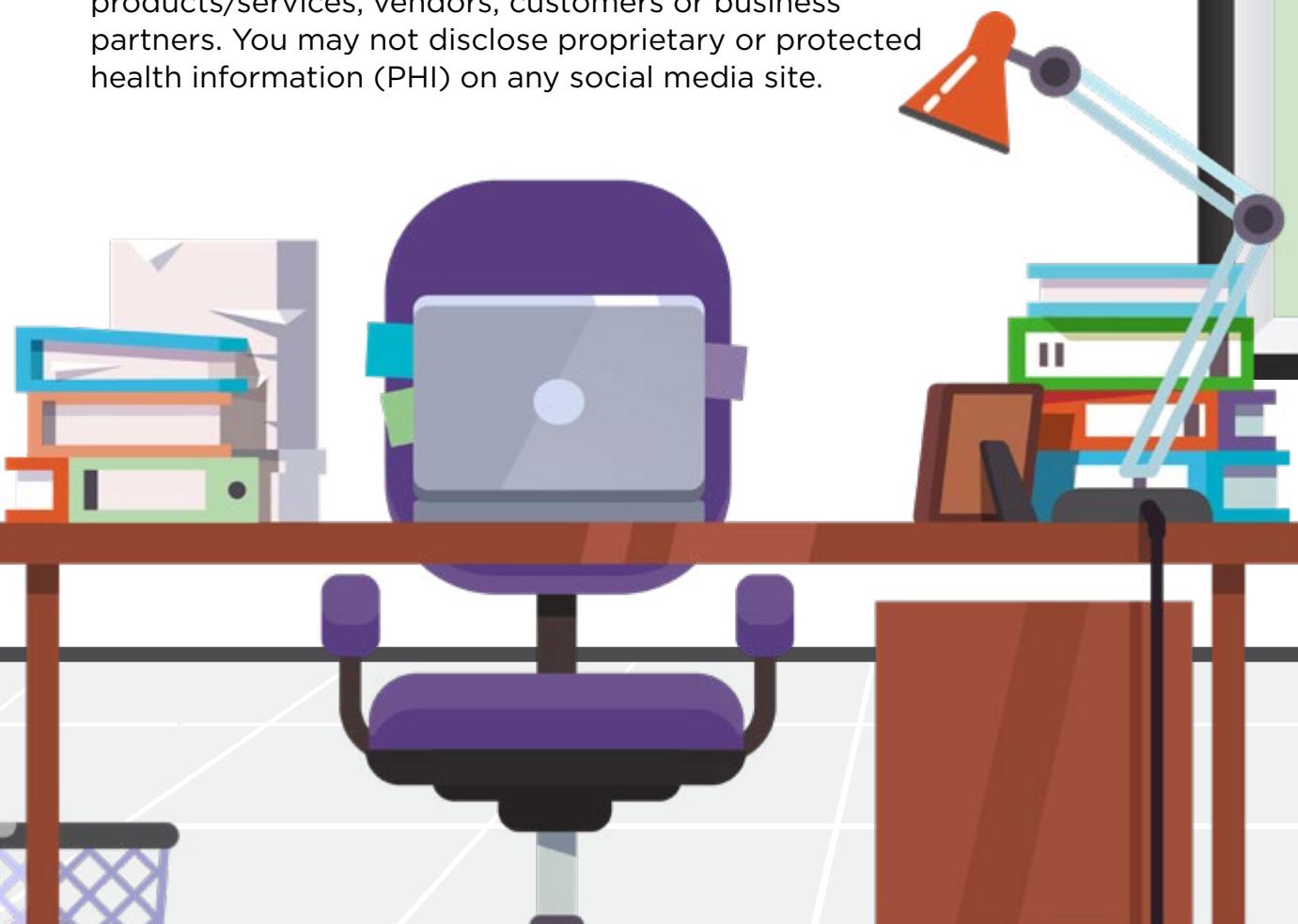
Social Media

On company social media pages you may show support by “liking,” commenting in a positive way or sharing within your own networks. On your own social media pages (e.g., your own Facebook page, Twitter feed or Google+ page) or through your own social media activity, you may not defame or malign team members, business practices, products/services, vendors, customers or business partners. You may not disclose proprietary or protected health information (PHI) on any social media site.

QUESTION & ANSWER

Could my social media post impact Delta Dental's reputation?

Yes. It's best to assume that anything you post could become front-page news. According to a CareerBuilder survey, 18% of employers have reported dismissing an employee because of something they posted on social media.



Team members who communicate on public internet pages about Delta Dental must disclose their connection with the company and their role, and must clearly state that the views expressed do not represent the views of the organization.

Marketing and Communications is responsible for final approval of all messages and content posted on company social media channels. Any public posting that may jeopardize our brand or reputation should immediately be brought to the attention of Marketing and Communications. For more information, please refer to the Social Media Policy.





Truth in Advertising/Media

Delta Dental understands the importance of accuracy and appropriate transparency in all internal and external communications. The information we provide needs to be correct and supported by our business practices.

As a regulated company, we are required to file periodic reports with insurance departments and other agencies in the states in which we do business. It is company policy to make full, fair, accurate, timely and understandable disclosures in compliance with all applicable laws and regulations in all required reports.

Political Activity/Lobbying

You may choose to contribute personal time and money to political activities; however, you need to be clear and disclose as necessary that you are acting on your own behalf and not on behalf of Delta Dental. Delta Dental's name may not be used in a way that suggests the company sponsors or endorses your personal political activities, nor may you use your position to pressure fellow team members to make political contributions or support/oppose particular candidates. More generally, you may not use any company resources (except as permitted by Government Affairs) for political purposes.

Our Government Affairs team works to make sure that Delta Dental has a voice in the decisions made by government officials. To make sure that our advocacy is consistent, coordinated, and in compliance with laws, you must obtain the approval of Government Affairs before contacting government officials on behalf of Delta Dental about legislation, regulations, programs or policies, or before providing any allowable gifts, meals, entertainment or travel to a government official. If you have a question or concern, [report it immediately](#).



OUTSIDE EMPLOYMENT

Conflicts of interest occur when our outside activities could influence our professional conduct.



Team members with access to sensitive proprietary information are prohibited from holding outside employment or consulting positions with other dental service corporations, insurance companies or any organization administering dental benefits.

We recognize that any such dual employment raises potential conflicts of interest for the team member, as well as difficulties in maintaining strict confidentiality of company information. If there are any questions as to whether a particular position is covered by this policy, Human Resources should be contacted. For more information, refer to the [Outside Employment Policy](#).

QUESTION
& ANSWER

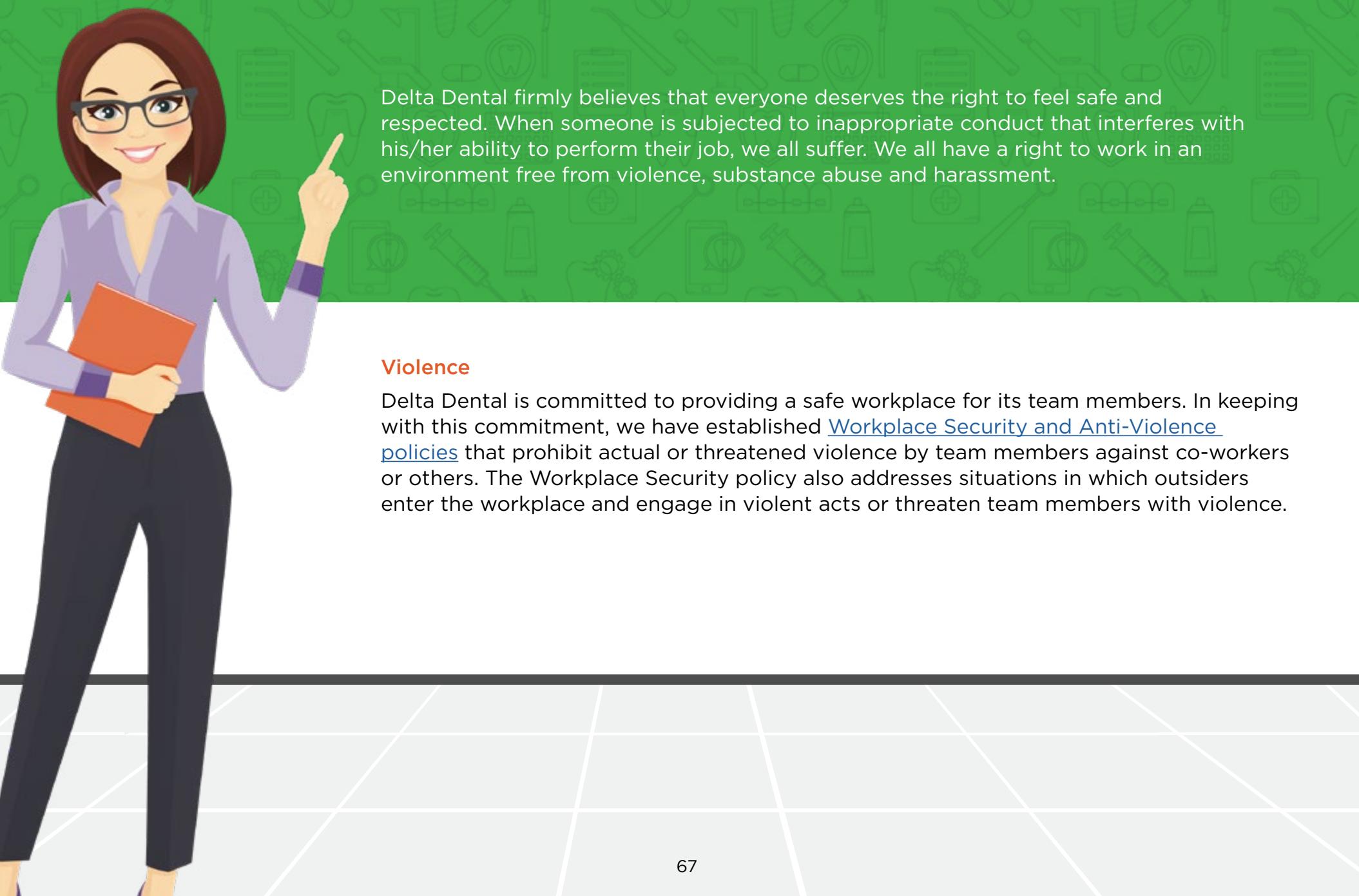
I received a job offer to work at a Delta Dental office on the weekends. Can I accept the job?

Working in a dental office could mean you handle claim files, which could be a conflict of interest. You should inform your manager and seek guidance from the Legal Department before accepting the job.



WORK PLACE SAFETY, HEALTH AND DIVERSITY

“To see a wrong, and not expose it, is to become a silent partner to its continuance.” – Dr. John Raymond Baker



Delta Dental firmly believes that everyone deserves the right to feel safe and respected. When someone is subjected to inappropriate conduct that interferes with his/her ability to perform their job, we all suffer. We all have a right to work in an environment free from violence, substance abuse and harassment.

Violence

Delta Dental is committed to providing a safe workplace for its team members. In keeping with this commitment, we have established [Workplace Security and Anti-Violence policies](#) that prohibit actual or threatened violence by team members against co-workers or others. The Workplace Security policy also addresses situations in which outsiders enter the workplace and engage in violent acts or threaten team members with violence.

Although some kinds of violence result from societal issues that are beyond our control, Delta Dental believes that increased awareness and vigilance can improve the overall security and protection of our team members. In order to accomplish this objective, we require the cooperation of all team members. The company believes that team members may be better prepared to avoid or prevent violence if they are able to recognize early warning signs and follow appropriate response procedures. You will therefore play a crucial role in the administration of our anti-violence policy.



Substance Abuse

We are firmly committed to a policy against the use of drugs. In keeping with this commitment, we strictly prohibit the use, transfer, possession, distribution, sale or being under the influence of drugs or alcohol while performing job functions, while on the company's premises, while operating a vehicle owned or leased by Delta Dental, or if driving your personal vehicle on company business.



Harassment

We want Delta Dental to be a place where everyone feels safe, comfortable and has the opportunity for a thriving career. To achieve this, we must not turn a blind eye to intimidation, harassment or abuse of power. Harassment includes sexual harassment, but it is also any behavior that is disruptive or upsetting and creates an environment that is hostile and/or intimidating. Most people who are victims of harassment don't report it because they fear being labeled a troublemaker, losing their jobs or believe it will come down to their word against the other person's. Harassing conduct of any kind will not be tolerated. We strongly encourage everyone to report harassment so we can take immediate action. Managers who witness or receive reports of harassment are required to report it. For more information, refer to Delta Dental's [Harassment policy](#).



QUESTION & ANSWER

What is sexual harassment?

Sexual harassment may consist of unwelcome verbal, visual or physical conduct that makes someone feel uncomfortable. Examples include:

- Requests for sexual favors, sexual advances or demands for dates
- Sexually oriented jokes, pictures, text or email messages
- Explicit or degrading comments about appearance

Does something feel wrong? Please share your concerns. We want to hear from you and will protect you from retaliation.





Affirmative Action/Nondiscrimination

Delta Dental recognizes and reaffirms the vital importance of affirmative action to assure equal employment opportunity for all. We also see this policy as ultimately beneficial to Delta Dental as a company. We pledge to continue a determined and sustained effort in support of this belief and the principles in the [Affirmative Action policy](#). Delta Dental is committed to affirmative action with the desired result of creating improved opportunities for groups that have been historically excluded or underrepresented, such as women and minorities.



Unlawful discrimination is prohibited. It is Delta Dental's policy that recruiting, hiring, transfer, promotion, termination, compensation, benefits, company-sponsored training, education, educational assistance, social, recreational and health programs and all layoff and return-from-layoff policies are to be applied without regard to race, color, religion, ancestry, sex, gender, gender identity/expression, citizenship, national origin, age, sexual orientation, marital status, veteran status, pregnancy, physical disability, mental disability or medical condition or any other characteristic protected by state or federal law. Retaliation and/or intimidation as a result of reporting violations of this policy will not be tolerated. Appropriate disciplinary action will be taken to address violations of this policy.

It is the responsibility of each team member, including all members of management, to disseminate, practice and enforce all aspects of the company policy of nondiscrimination.



QUESTION & ANSWER

My manager frequently makes comments about my accent and uses offensive ethnic slurs. I'm worried that saying something will impact my career. What should I do?

You should report this issue immediately. Your manager's behavior is inappropriate and should be investigated. Regardless of their intent, your manager has created a work environment that is intimidating and you should never fear that your career will suffer if you speak up. Delta Dental will not tolerate retaliation for reports made in good faith.

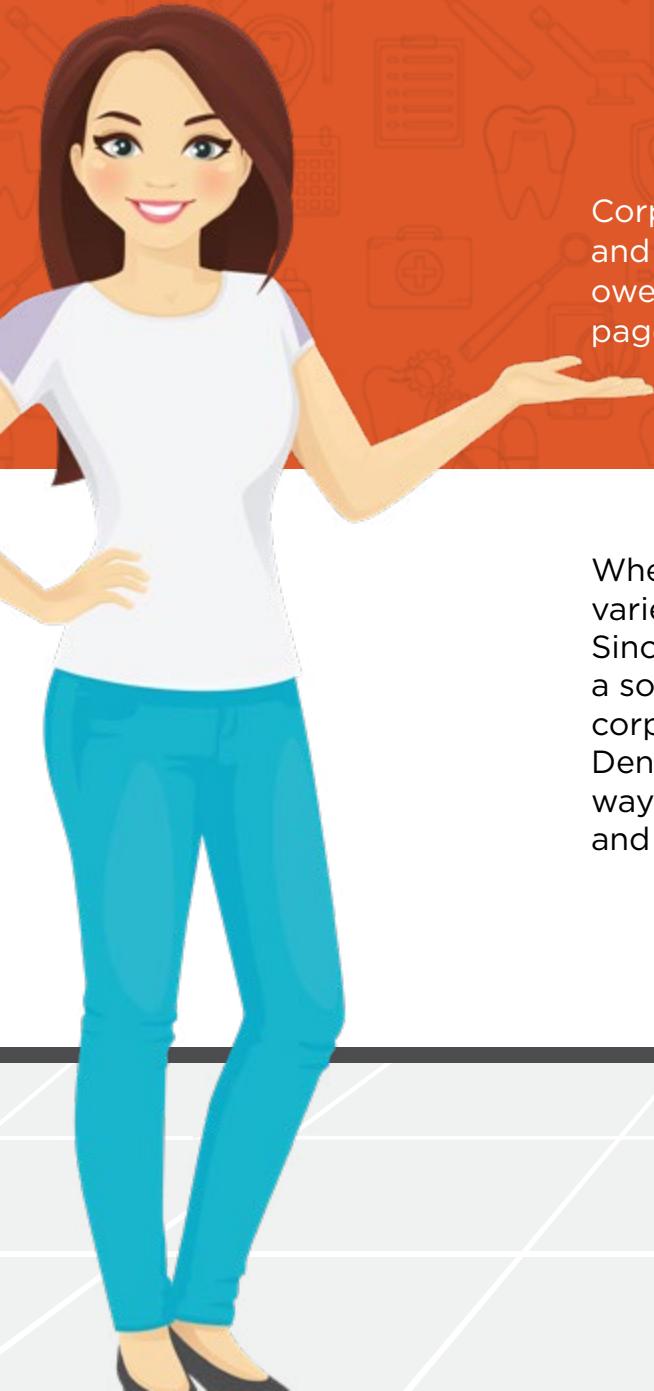


Labor Practices

Delta Dental supports and complies with all applicable federal, state and local regulations that ensure safe working conditions and equal employment opportunities at all its locations. Delta Dental will not tolerate the use of labor trafficking, such as child labor or forced labor, in any of its locations. The company expects our suppliers and contractors with whom we do business to uphold the same standards. Should a pattern of violations become known and not corrected, we will discontinue the business relationship.

CORPORATE SOCIAL RESPONSIBILITY

As a corporate citizen, we have an obligation to contribute in positive selfless ways to advance the business landscape, community and environment we serve.



Corporate Social Responsibility (CSR) is important to our clients, to communities and to our team members. CSR should not be thought of as some sort of social debt owed by a corporation. Corporations are nothing but a collection of words on a page, sealed with approval, until they are funded, staffed and operational.

When a corporation becomes operational, its production output creates impacts in a variety of ways, including on the environment, and both current and future generations. Since the value that corporations bring to society also comes at a cost, corporations have a social responsibility to give back to communities (local and otherwise) that support that corporation's existence and good fortune. CSR, therefore, provides a platform for Delta Dental to conduct itself as a model corporate citizen, and give back to its communities in ways that complement Delta Dental's interests and are in support of its purpose, mission and values.



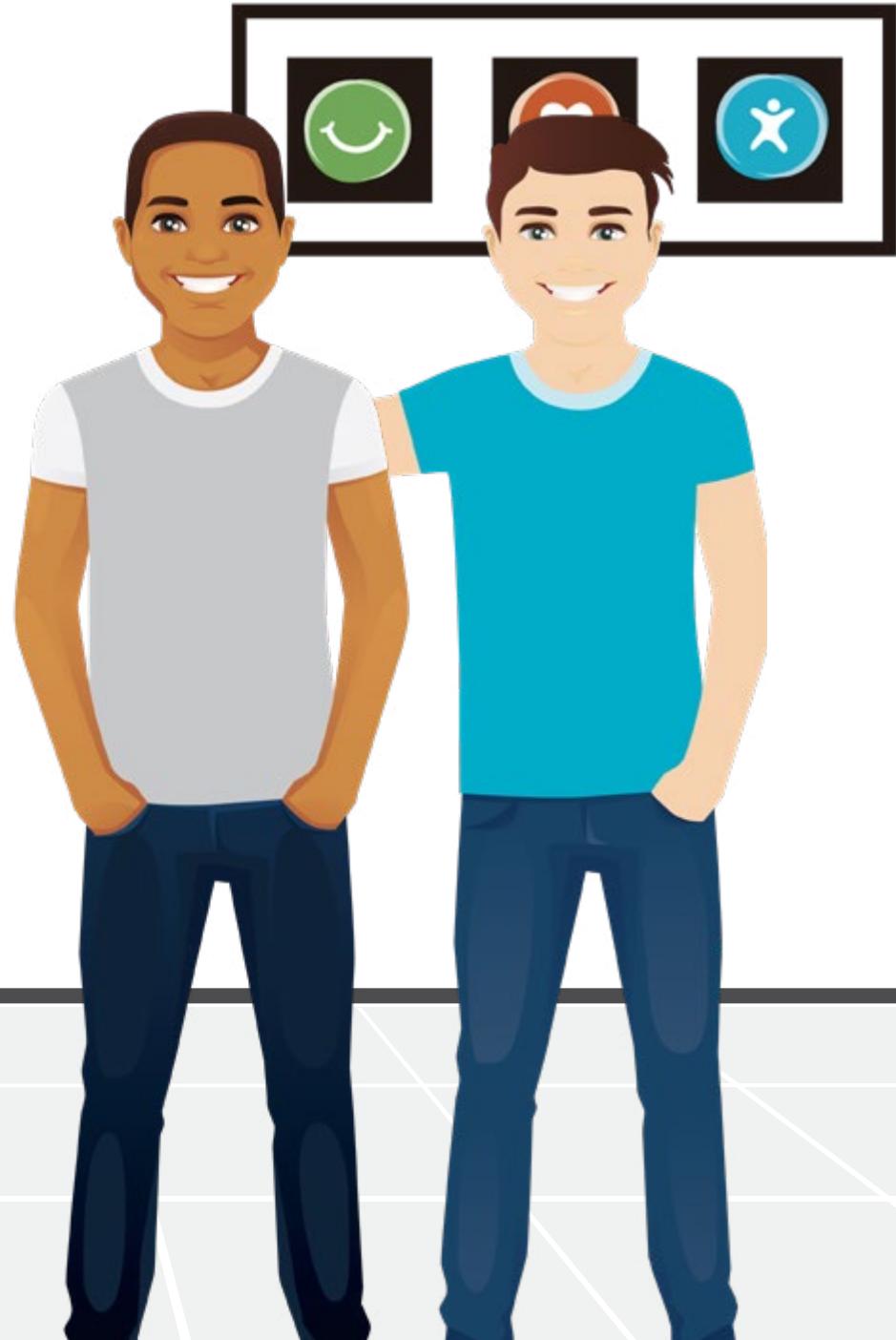
QUESTION & ANSWER

How can I get involved and share my ideas?

- Do you see anything we could be doing better to “go green?” Send your ideas to GoingGreen@delta.org.
- Interested in volunteer opportunities? Visit the [volunteer page](#) on the portal.

Delta Dental's CSR program rests on four conceptual elements that build on each other:

- **Economic responsibility** is ensuring that our company is financially healthy. This encompasses strategies that ensure our financial viability while also returning social value. You are empowered to look for ways to improve our value chain.
- **Legal responsibility** is acting economically responsible and following all applicable laws and regulations. All team members play an integral role in ensuring legal compliance.



- **Ethical responsibility** is ensuring we're following this Guide and doing the right thing morally as we fulfill our economic and legal responsibilities. We promote employee welfare with competitive wages and benefits, and we promote workforce diversity and wage equality. We're also environmentally conscious in terms of taking steps to reduce our environmental impact.
- **Philanthropic responsibility** is ensuring that while we're economically, legally and ethically responsible, we also go beyond what is required in terms of benefiting society. We give back to our communities through our foundation, direct corporate gifts, scholarships, matching employee donations, and through our volunteer program.



These concepts are part of the larger concept of corporate social responsibility — our impact on environmental and social well-being. Each team member is responsible for supporting these concepts and are encouraged to seek ways to contribute to the success of the CSR program. For more information on Delta Dental's CSR efforts, visit the [Community Center](#) section on our corporate website.





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