

AGENT CODE OF CONDUCT AND ETHICS

The Company's corporate values of honesty, integrity, fairness and impartiality form the foundation of which the Company's Agent Code of Conduct and Ethics is built. All agents must respect and obey all federal and state laws relating to their activities including Centers for Medicare and Medicaid Services (CMS) regulations. The Company has zero tolerance for noncompliant marketing behavior. Over and above compliance, Company agents are expected to act with the highest ethical standards in all of their business dealings.

All agents representing the Company and its carrier partners are required to abide by this Agent Code of Conduct and Ethics. Those who violate standards in this Code will be subject to disciplinary action pursuant to the Company's agent disciplinary procedures.

COMPETITION AND FAIR DEALING. The Company seeks to outperform its competition fairly and honestly, and seeks competitive advantages through superior performance, not through unethical or illegal business practices. You must endeavor to respect the rights of and deal fairly with the Company's clients, carrier partners and competitors. You may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

ANTI-DISCRIMINATION. The Company is firmly committed to providing equal opportunity in all aspects of its business practices and will not tolerate illegal discrimination or harassment of any kind. In dealings with associates, clients and the general public, you must always be mindful to act in accordance with the highest standards of professionalism and ethics, and avoid conduct that could be construed as discrimination or harassment. Examples include comments on racial or ethnic characteristics and unwelcome sexual advances.

NON-DISPARAGEMENT. You will not disparage the Company, its carrier partners, competitors or their products or plans, nor shall you make unsubstantiated comparisons or seek to influence the cancellation of any contract that may exist between competitors and their clients.

USE OF APPROVED MARKETING MATERIALS. You will not use any unapproved marketing materials.

IDENTIFICATION. You will always clearly identify yourself and your relationship to the Company, disclose that you are a licensed insurance agent, and never imply in any manner that you are an employee of any carrier, plan or the U.S. government.

RIGHTS OF CLIENTS. You will conduct yourself with courtesy and dignity and with respect for the rights and reasonable requests of clients and potential clients at all times.

BEST INTERESTS OF THE CLIENT. The business of insurance is declared to be a public trust in which all agents of all companies have a common obligation to work together in serving the best interests of the insuring public. Consistent with that, you must understand and observe the laws governing insurance in letter and in spirit by presenting accurately and completely every fact essential to a client's decision, and by always placing the client's best interests first.

DECEPTIVE ACTIVITIES. You will not engage in activities that could mislead or confuse clients or potential clients or misrepresent the Company, its carrier partners or their products or plans.

UNLAWFUL INDUCEMENTS. Inducements are a violation of law and are unethical. Except as otherwise expressly provided by law, you will not knowingly make or offer any agreement pertaining to any insurance contract other than as plainly provided in the contract itself. Except as expressly provided by law, you will not give or provide anything of value to a client, directly or indirectly, as an inducement to any insurance transaction. In addition to tangible items having value, inducements include special favors and offers to pay or rebate any portion of premiums or charges, or to share commissions or bonuses.

MISREPRESENTATION. Misrepresentations are a violation of law and are unethical. You will not make any statement concerning any insurance product or plan that is untrue, deceptive or misleading. You will not make a false or misleading statement as to the financial condition of any carrier, or use any name or title of any insurance product or class of products misrepresenting the true nature thereof.

FRAUDULENT SIGNATURES. You will not submit to a carrier on behalf of a client an application or policy-related document bearing a false or fraudulent signature or initials. Such conduct is illegal and unethical, and is grounds for immediate termination. It is the Company's policy to report all such violations to the appropriate law enforcement authority.

DUTY TO VERIFY CLIENT INFORMATION AND INTENT. You will ensure that all information on any application is completely filled in by the client or the client's legal representative, or by you at the direction of the client or the client's legal representative, and in the presence of the client or his/her authorized legal representative. You will never sign any application on behalf of any client, even if directed by the client to do so. You will verify that all information on the application is correct, and confirm the client's intent to make application for that product or plan.

INAPPROPRIATE USE OF DESIGNATIONS. You will not, in any sales presentation or solicitation for insurance, use a designation or title in such a way as to falsely imply that you:

1. Possess special financial knowledge or have obtained specialized financial training; or
2. Are certified or qualified to provide specialized financial service.

You will not use terms such as "financial advisor" in such a way as to falsely imply that you are licensed or qualified to discuss, sell, or recommend financial products other than insurance products. You will not, in any sales presentation or solicitation for insurance, falsely imply that you are qualified to discuss, recommend, or sell securities or other investment products in addition to insurance products.

DUTY TO ENSURE SUITABILITY OF PRODUCT RECOMMENDATION. In recommending any product to a client, you will first make reasonable efforts to obtain information concerning the client's objectives, needs, financial and health status to evaluate the suitability of the recommendation. Before initiating the purchase or exchange of an insurance product resulting from a recommendation to a consumer, regardless of whether the transaction will involve replacement or exchange of any other product or plan, you will objectively consider all information provided by the client to ensure that the transaction is suitable.

HIGH PRESSURE SALES TACTICS. You will not use any form of scare tactic, coercion, deception, sympathy appeal, false sense of urgency or other high pressure tactic to cause a client or potential client to enter into any transaction. You will always give clear and accurate information regarding your relationship with the Company and its carrier partners, and avoid the use of false, contextually misleading, or exaggerated statements.

PRODUCT/PLAN REVIEW. During every Product/Plan review, you will take steps to fully explain all benefits and exceptions as it pertains to each carrier.

UNSOLICITED CONTACT. You will not engage in any door to door or unsolicited marketing or sales activity pertaining to any Medicare-related product.

REFERRALS. In connection with Medicare Advantage products, you will not make direct initial contact with any person referred to you by a client. Instead, you may ask the client to provide your contact information to that person and have him/her initiate contact with you.

CMS GUIDELINES ON TERMINOLOGY AND PROHIBITED WORDS AND PHRASES. You will be mindful of all current CMS marketing guidelines relating to the use of prohibited words and phrases. You will never use the word "free" to market any insurance product or plan, and shall avoid the use of absolute superlatives such as "best plan" in any Medicare Advantage presentation.

SCOPE OF APPOINTMENT. In the marketing of Medicare Advantage products, you will ensure that all CMS and carrier regulations regarding scope of appointment are strictly followed, including mandatory wait periods, prior to discussion and recommendation of a product. In every instance, you will ensure that the products discussed are those for which the client provided the appropriate advanced consent.

I have read and understand the Company Agent Code of Conduct and Ethics. I understand that, should I be found to be in violation of any of the provisions of this Code during my association with the Company, my contact and appointment are subject to termination.