

## Conflicts of Interest

### When and How to Report

Humana recognizes that relationships are important in a sales environment; however, it is important to avoid conflicts of interest in order to maintain compliance. A conflict of interest can arise when an agent has a financial interest, business partnership or personal relationship that could influence their independent decision making.

According to the Producer Contract, agents/brokers should disclose relationships that could be potential conflicts of interest. An internal committee reviews the relationship to determine whether or not a conflict of interest exists. If the committee determines a conflict of interest exists, it will provide guidance on the steps that must be taken to avoid the conflict. A lack of complete and timely disclosure can result into disciplinary action, up to termination. The following are examples of the most common conflicts of interests that are not properly reported by agents:

- An agent has a financial interest in, or financial arrangement with, a provider contracted with Humana/CarePlus or a staff member at a contracted provider's office.
- An agent has a close personal or romantic relationship with a Humana/CarePlus contracted provider or a member of the provider's staff.
- An agent has a familial, close personal or romantic relationship with a Humana/CarePlus career or contracted external agent.
- An agent steers beneficiaries to a provider's office where the agent has a relative employed by the provider.
- An agent sends Humana/CarePlus sales/marketing leads to relatives who are external agents.
- An agent sells individual life policies outside the Humana/CarePlus product offerings.

If you are in doubt about whether a specific situation constitutes a conflict of interest, or may give rise to the appearance of such a conflict, email Sales Integrity at [salesintegrity@humana.com](mailto:salesintegrity@humana.com) AND the Ethics Office at [ethics@humana.com](mailto:ethics@humana.com). You can also report anonymous concerns using the confidential Ethics Help Line: 1-877-5-THE-KEY or Web Reporting site [www.ethicshelpline.com/](http://www.ethicshelpline.com/).

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