



Compliance Program Charter

Premier Senior Marketing, Inc.

2011



Introduction

The principle purpose of Premier Senior Marketing, Inc.'s Compliance Program is to promote and facilitate corporate governance of operations and services rendered in accordance with established laws, regulatory requirements, and the Policies and Procedures of Premier Senior Marketing, Inc ("Premier"). The Compliance Program ensures the business operations, of every individual who conducts business for or on behalf of Premier, reflect the values, integrity and commitment to compliance that Premier strives to meet.

Responsibilities and Obligations

Premier's Compliance Program is guided by the principles contained within our contracted carrier's corporate responsibilities and compliance programs. It includes the 7 key elements of an effective compliance program (see below) which will foster a culture that promotes prevention and detection of conduct that does not conform to the laws, regulations and company policies associated with government-funded healthcare programs. These 7 key elements include:

1. **Written Policies and Procedures** – The policies and procedures of Premier should serve as guide for its employees, contracted agents and business partners in regards to compliance standards and the procedures and practices relating to compliance.
2. **Compliance Officer and committee** – An effective compliance program must have a compliance officer to oversee the entire program. The compliance officer's responsibilities include developing, operating and monitoring the compliance program; along with reporting to management on a periodic and as needed basis. The compliance officer will also be responsible for coordinating and participating in the training of all employees, independently investigating compliance matters and ensuring that any necessary corrective action is taken.
3. **Effective training and education** – A necessary component of every compliance program is proper and periodic training. This training and education should help all individuals who do work on behalf of Premier understand the laws, regulations and policies applicable to their day to day business activities. All employees will be trained to ensure they've gained the necessary knowledge of all laws, regulations, and best practices of a successful Compliance Program.
4. **Effective lines of communication (including anonymous reporting function)** – Effective lines of communication are imperative to the success of any business operation, and a compliance program is no different. The compliance officer must effectively create and maintain effective lines of communication. It is crucial to the success of the program that all employees and staff have an effective way to ask questions and report concerns or violations when the need arises. It is Premier's hope that everyone will take an active role



and communicate openly when an issue or question arises. This is an ongoing process and changes and revisions will be made on an as needed basis.

5. **Internal monitoring and auditing** – There will be ongoing evaluation and monitoring of the compliance program to ensure its effectiveness. Premier will utilize multiple avenues for internal monitoring and auditing purposes. To make the program more effective, Premier may use Compliance Committees and/or “Tiger Teams” to help monitor day-to-day operations and practices to ensure our organization is remaining compliant. Information gathered from the evaluation process may result in correction and/or modification of these processes.
6. **Disciplinary enforcement** – Depending on the severity of violations, re-training and disciplinary actions up to and including termination may be taken if the monitoring and auditing process uncovers any egregious compliance errors.
7. **Mechanisms for responding to and reporting detected problems** – All reports and/or indications of suspected noncompliance will result in an immediate investigation to determine whether there has been a violation of law or other requirements; and, if so, make sure all affected parties are notified of the breach, and do everything possible to correct/minimize the severity of the violation.

Structure and Membership of FMO Compliance Organizations

As mentioned earlier, the Compliance Officer will be the head of the Compliance Program. He/She will be responsible for everything regarding compliance. It is their responsibility to keep the lines of communication open and fluid, not only with employees, but with senior management as well. Also, they are responsible for training and educating all employees regarding compliance. However, the success of any compliance program depends on the diligence of everyone involved to be aware of all rules and regulations and adhere to them, as well as help monitor for possible breaches and violations, and if any are found report them immediately.

Knowledge of Regulations and Premier Senior Marketing, Inc. Policy

Premier’s Compliance Program will work to establish and maintain an inventory of applicable policies and procedures, regulations and guidance documents applicable to the day-to-day duties of Premier’s employees and contracted agents. Additionally, broader, more general compliance requirements pertaining to, but not limited to, Information Security, Records Management, and Privacy and Security Awareness will be addressed in these policies and procedures as well. These will include, but are not limited to, HIPAA regulations, CMS guidelines, and Federal, State, and/or Local laws and regulations.



Oversight of FMO Compliance Program

To help ensure the success of the Compliance Program, Premier will conduct periodic reviews and audits of compliance operations and performance. The goal of this internal monitoring is to uncover any non-compliance issues, so they can be addressed internally, and hopefully rectified before an actual breach of compliance occurs. This should act as an internal checks and balances system to help ensure the success of the Compliance Program. Also, certain carriers Premier is contracted with will aide in the monitoring and auditing of the Compliance Program to ensure the entire FMO channel is remaining compliant.

A decorative graphic on the right side of the page. It features two blue circles of different sizes, one smaller than the other, positioned at the ends of two thin blue lines that converge towards the top right corner. The circles are composed of concentric layers of different shades of blue, creating a 3D effect.

Policies and Procedures

Premier Senior Marketing, Inc.

2011



Policy Number: S-01
 Version Number: 1.0
 Last Revised: 2-23-2011

Policy on Policies

I. POLICY APPLICABILITY

| Stakeholders | Products | Functional Owners |
|----------------------------|--|------------------------------------|
| Premier Employees/Staff | <ol style="list-style-type: none"> 1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans 2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans 3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial. | Thomas A Schueth A Mike Wingate |

II. POLICY STATEMENT

Premier Senior Marketing is committed to achieving and maintaining world-class levels of corporate governance and ethical business conduct. Our goal is to advance a company culture that fosters a real dedication to care and serve, to innovate and grow, and to meet our high standards of business practice and performance.

III. POLICY PURPOSE (Scope)

The policies and procedures created and implemented by Premier Senior Marketing, Inc should provide clear guidance to all workforce members about our obligations under the law and how we do business.

IV. POLICY DEFINITIONS

All of Premier Senior Marketing’s administrative staff and marketing teams shall herein be referred to as:”Staff” or “Employee”

Premier Senior Marketing shall be referred to as: “Premier”

All external agents/ staff/ managers/business entities contracted under Premier are referred to as: “Agent(s)”



All companies represented by Premier Senior Marketing is referred to as “Company or Carrier”

Centers for Medicare and Medicaid Services shall be referred to as: CMS

Health Insurance Portability and Accountability Act of 1996 shall be referred to as: “HIPAA”

Health Information Technology for Economic and Clinical Health Act of 2009 shall be referred to as “HITECH”

V. POLICY PROVISIONS and EXHIBITS (Procedure)

1. All policies shall be created utilizing high ethical standards and in accordance with all laws, rules, and regulations that Premier is governed by. This includes, but is not limited to, regulations set forth by HIPAA and the HITECH Act, as well as CMS and governmental standards that apply to insurance and insurance marketing industry. Such policies shall also be created to implement good business practices and general business ethics.
2. Policies will be reviewed and approved by the Compliance Committee which consists of at least one Functional Owner, one or more Administrative Staff, one Operations manager and the Compliance Officer.
3. All policies and procedures shall be distributed to, or made otherwise available to, the entire staff and any agents that shall be under Premier’s hierarchy.
4. All policies and procedures shall be updated and amended as needed pertaining to changes in origin of the policy, regulatory changes, need or as required by law.
5. All policies and procedures shall be regularly maintained and secured and shall be stored with other important business records for safekeeping.
6. All members of the staff are required to read, understand, and comply with this and all other policies and procedures created and implemented by Premier Senior Marketing, Inc.

VI. Monitoring and Enforcement

All employees are responsible for enforcing and upholding this policy. Employees who violate this policy are subject to discipline up to and including termination in accordance with Premier Senior Marketing, Inc.’s Corrective and Disciplinary Action Policy.



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Privacy and Security Policy

I. POLICY APPLICABILITY

| Stakeholders | Products | Functional Owners |
|--------------------------------------|--|------------------------------------|
| Premier Employees/Staff Agents | <ol style="list-style-type: none"> 1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans 2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans 3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial. | Thomas A Schueth A Mike Wingate |

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III. POLICY PURPOSE (Scope)

The objective of our Privacy and Security policies is to manage all personal information responsibly and legally and to serve our business objectives and help build trust with stakeholders.

IV. POLICY DEFINITIONS

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Business Organization – is a Business Group, Business Segment, Business Unit, or Corporate Department.

Personal Information – is information about an individual

1. that is created or received by or on behalf of a Business Organization; and
2. that identifies the individual, or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

By way of example, Personal Information includes "Protected Health Information" (PHI) and “electronic Personal Health Information” (ePHI) as defined and regulated in the HIPAA Privacy Rule, "Non-public personal information" as defined and regulated in the Gramm-Leach-Bliley Act, and "personal data" under Directive 95/46/EC of the European Parliament.

V. POLICY PROVISIONS and EXHIBITS (Procedure)

1. Management and Accountability

- 1.1. All employees and agents of Premier are responsible for understanding and complying with applicable laws and regulations that protect the privacy and security of Personal Information about members, customers, employees and business partners. All employees must collect, use and disclose Personal Information in a manner consistent with applicable laws in the countries in which we do business.
- 1.2. Each employee and agent within Premier’s hierarchy is responsible for monitoring and ensuring compliance with this Policy by the business operations for which the person or organization is responsible, and for ensuring that this Policy is communicated to all employees, contract workers, temporary staff and others who have access to Personal Information on behalf of Premier and who report directly to or up through the manager.
- 1.3. Each organization within Premier’s hierarchy is responsible for identifying the applicable local privacy laws, identifying the Personal Information and sensitive Personal Information in their operations, and developing policies, procedures, standards, and guidelines for meeting the requirements of this Policy and local law.

2. Collection

- 2.1 Each employee, agent, and organization under Premier will collect Personal Information lawfully, and will require the same of third parties that collect information on their behalf.
- 2.2 The collection of Personal Information should be limited to that which is relevant and appropriate for the purposes of providing a product or service, employment of individuals or engagement of contract workers and temporary staff, or is required by law.



- 2.3 The definition of sensitive Personal Information varies across jurisdictions and can include information regarding race, ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, commission or alleged commission of offenses, court proceedings, financial information, government-issued identification numbers (such as social security numbers), and more. Premier will limit the collection of sensitive Personal Information to that related to a legitimate business purpose. Where required by law, Premier will collect sensitive Personal Information only with the consent of the individual.

3. Use and Retention:

- 3.1. Premier will only use and store Personal Information for legitimate business purposes, consistent with this Policy, legal requirements, and any applicable privacy notices provided to the individual.
- 3.2. Premier will retain Personal Information used to meet business needs and satisfy legal requirements. Agents and Business Organizations under Premier are responsible for developing reasonable policies and procedures for the retention and secure disposal of Personal Information in accordance with applicable law and in conformance with the Information Risk Management Information Security policies and UnitedHealth Group's Records and Information Management Retention Policy and Retention Schedule.

4. Security

- 4.1. Premier will establish, implement, and monitor reasonable administrative, physical, and technical information security safeguards to protect Personal Information, based on its sensitivity and criticality, from unauthorized access, disclosure, corruption, or loss.

5. Data Quality

- 5.1. Premier will take reasonable actions to maintain accurate, complete, and up-to-date Personal Information.

6. Monitoring and Enforcement

- 6.1. Every employee and agent is responsible for compliance with privacy laws, as well as for promptly raising any concerns about possible violations of this Policy. If you are aware of a situation that you believe may be in violation of this Policy or otherwise unlawful, you should immediately contact your manager and the compliance officer.
- 6.2. Premier will promptly report any incidents of non-compliance with this Policy and its supporting guidelines to both the Legal Department and the Privacy Office of the company that is involved. In cooperation with the Privacy Office, Business Organizations are responsible for investigating reported incidents and taking appropriate actions and notification, if required, stemming from reported privacy incidents. Business Organizations will keep the Privacy Office informed of all investigations, results, employee discipline, legal action, and risk mitigation involved.
- 6.3. Premier must review controls relevant to the implementation of this Policy for their effectiveness.



- 6.4. Premier's management will address privacy complaints following an established process.
- 6.5. If Premier or one of its carriers determines that a staff member or agent has violated this Policy, that person will be subject to discipline. Discipline may include warnings, retraining, suspension with or without pay, and/or termination. Factors to be considered in assessing disciplinary actions include, but are not limited to: the extent of the violation, the nature of the violation (accidental, inadvertent, or purposeful misconduct), the potential harm or risk created by the disclosure for the individuals whose information was released, the client, company or other data source, or the Business Organization, whether the employee self-reported and was forthcoming in the investigation and whether there has been repeated or purposeful misconduct or violations of the carrier or Business Organization policies and procedures by the employee. The discipline to be applied in an individual case will be reviewed at a senior management level to ensure that consequences are appropriate.

7. Other Privacy Policies.

- 7.1. This Policy operates in conjunction with other privacy policies of Premier and all carriers that Premier represents, and requires compliance with such other privacy policies.

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Agent Oversight

I. POLICY APPLICABILITY

| Stakeholders | Products | Functional Owners |
|--------------------------------------|--|------------------------------------|
| Premier Employees/Staff Agents | <ol style="list-style-type: none"> 1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans 2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness 3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial. | Thomas A Schueth A Mike Wingate |

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V. POLICY PROVISIONS

1. Every Agent who is contracting under Premier’s hierarchy is required to provide a current and state appropriate insurance license. When required by particular carriers, the agent is also responsible for maintaining Errors and Omissions insurance and providing Premier with a current copy of such coverage.
2. Premier depends entirely on the resources of our Companies to provide us with applications, brochures and marketing materials deemed necessary for our agents to conduct business in compliance with laws and regulations of being an insurance agent. Appropriate supplies are distributed to agents either by requesting them directly from the company or from Premier’s office. All marketing materials used must be approved by CMS and follow the regulations regarding their use. Failure to comply with these regulations may result in withholding or withdrawing of commissions, retraining, suspension of marketing privileges, termination, and/or reporting of misconduct to State Departments of Insurance.
3. Every Agent contracted under Premier must adhere to the regulated guidelines regarding the marketing and selling of all Medicare regulated products. These products include but are not limited to Medicare Advantage Plans and Prescription Drug Plans. These products have specific regulations as to how/when they can be marketed, sold, and submitted. It is imperative that all agents are aware of these regulations and follow them. Corrective action, up to and including termination, may result in cases of non-compliance with these regulations.
4. It is a CMS requirement that all sales and marketing events are reported to CMS. Therefore, agents are required to report any sales meetings or events in which they are presenting to a group of customers. They must report the event by the 20th of the month prior to the date of the sales event (or as CMS requires). Cancellations or changes to the sales event must be made 48 hours prior to the event or as CMS permits or allows. All agents must adhere to each carrier’s individual regulations regarding the process of reporting sales events and meetings.
5. All applications for insurance coverage written by agents under Premier’s hierarchy and submitted to Premier’s office are reviewed by administrative staff for accuracy and legibility. Each application will be checked to insure all appropriate forms are attached,



such as Scope of Appointment, Replacement forms, and suitability forms. Application information is verified against agent records to insure proper licensing before Premier submits applications to the carriers. In the event that customer information is not accurate or illegible, an administrative person will take immediate action to contact the agent.

Certain products are regulated by CMS and therefore have regulations on the timeliness of their submission. These products include but are not limited to Medicare Advantage Plans (MA) and Prescription Drug Plans (PDP). For these regulated products, it is required that the **Completed** Enrollment Request Forms be submitted by our carriers to CMS within 7 calendar days from the agent signature date. In turn, our carriers, or the plan sponsors, have regulations regarding the timeliness of enrollment submissions as well. Most require that the **Completed** Enrollment Request Forms are submitted to them (plan sponsor) within 24 hours of the agent signature date.

6. Premier relies on the resources of our carriers to provide reports showing any irregular or unethical sales practice(s). Upon receipt of such reports, administrative staff will review and report to management of such practice. Management will determine the appropriate cause of action.

- a) - Marketing teams call agent to discuss wrongdoing and offer method of correction
- b) - Applications are referred to legal department for further action

7. In order to comply with our Carriers' requirements regarding agent termination reporting, it is Premier's policy to report all agent contract terminations, whether "For Cause" or "Not For Cause", to the appropriate carriers for review.

VI. Monitoring and Enforcement

All employees and agents are responsible for enforcing this policy. Those who violate this policy are subject to discipline up to and including termination in accordance with Premier Senior Marketing, Inc.'s Corrective and Disciplinary Action Policy.



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Training and Education

I. POLICY APPLICABILITY

| Stakeholders | Products | Functional Owners |
|--------------------------------------|--|------------------------------------|
| Premier Employees/Staff Agents | <ol style="list-style-type: none"> 1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans 2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans 3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial. | Thomas A Schueth A Mike Wingate |

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III. POLICY PURPOSE (Scope)

This policy governs training and education related issues for Premier Senior Marketing, Inc. All personnel of Premier Senior Marketing, Inc. must comply with this policy. Demonstrated competence in the requirements of this policy is an important part of the responsibility of all members of the workforce under Premier’s hierarchy.

IV. POLICY DEFINITIONS

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Health Information Technology for Economic and Clinical Health Act of 2009 shall be referred to as “HITECH”

V. POLICY PROVISIONS

1. It is the Policy of Premier Senior Marketing, Inc to provide or make available clear and complete training to all staff and downline agents whether it comes directly from Premier itself or is provided by a carrier through product training, certification, or the like. The training shall encompass compliance rules, regulations and policies that govern our day-to-day business operations.
2. HIPAA training, at minimum, shall include the basics of HIPAA itself; the basics of HIPAA’s privacy and security requirements and restrictions; and a review of relevant and appropriate internal Policies and Procedures related to HIPAA and HIPAA compliance.
 - 2.1 Effective Feb 1, 2011 all current “staff” of Premier shall be required to view a video “Training Resources for Business Associates” in a classroom setting. At the completion of the training video, the staff will be required to complete an exam. Staff with a passing score will be presented with a certificate of completion. Those persons that do not pass will be required to review the video and test again. Not passing scores will be required to view the video in the presence of the Compliance Officer and retake the exam. After 3 failures, the person will be suspended from duty until such time as the person can pass the exam.
 - 2.2 All new hires will be required to view the video “Training Resources for Business Associates” during the new employee orientation before new employees are exposed to or work with individually identifiable health information. The new employee must be able to pass the HIPAA training exam prior to starting the job he/she was hired to do.
3. All agents that are planning to market and sell federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans are required to certify for each product as provided by the individual company or carrier. Premier relies solely on the company’s direction and protocol for the product certifications. Premier relies solely on the company’s direction and protocol for the product certifications. Premier relies on its carriers to provide or make available proper training and/or training materials deemed necessary for Premier staff and agents to accurately and successfully market the products of each carrier.



3.1 Premier's policy is to refrain from sending any supplies or marketing materials to an agent until notification from the company stating that an agent is certified and actively appointed with the company.

VI. Monitoring and Enforcement

All staff and agents are responsible for enforcing this policy. Those who violate this policy are subject to discipline up to and including termination in accordance with Premier Senior Marketing, Inc.'s Corrective and Disciplinary Action Policy.

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Corrective and Disciplinary Action

I. POLICY APPLICABILITY

| Stakeholders | Products | Functional Owners |
|--------------------------------------|--|------------------------------------|
| Premier Employees/Staff Agents | <ol style="list-style-type: none"> 1. All companies with federally regulated products and Prescription Drug Plans (PDP) including all Medicare Advantage, Special Needs Plans, and Prescription Drug Plans 2. All Health and Accident companies with state regulated products including all Medicare Supplement Insurance Plans, Long Term Care, Disability Plans, and Critical Illness Plans 3. All Life Insurance companies with state regulated Life Insurance Plans, Annuities, Single Pay, Final Expense and Burial. | Thomas A Schueth A Mike Wingate |

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III. POLICY PURPOSE (Scope)

This policy will establish fair and appropriate procedures covering corrective or disciplinary action for all employees and agents in Premier’s hierarchy.

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V. POLICY PROVISIONS

1. It is the Policy of Premier Senior Marketing, Inc to establish and implement appropriate, fair and consistent disciplinary actions for workforce members who fail to follow established policies and procedures, or who commit various offenses.
2. Certain offenses can invoke immediate termination, including, but not limited to:
 - Theft
 - Intentional lying or deception
 - Drug or alcohol use while on the job
 - Violence against persons or property
 - Breach of confidentiality
 - Insubordination or other refusal to perform
 - Using vulgar, profane or obscene language
 - Possessing or using weapons on company property
 - Being convicted of a crime that indicates unfitness for a job or presents a threat to Premier or its employees in any way
 - 2.1 Offenses involving obvious illegal activity may result in notifications to appropriate law enforcement authorities.
 - 2.2 Offenses of a lesser degree may result in a written warning.
 - 2.3 More than three written warnings results in termination
3. Premier relies entirely on the resources of our carriers to provide us with reports which monitor agent activity. The reports are derived from verification calls made by the carrier to the customers. The reports indicate any negative responses from customers, and reveal potential sales issues. The reports are viewed by a committee consisting of one functional owner, one administrative staff and one marketing team member.
 - 3.1 Each marketing team will receive a copy of the agents directly under his chain of command to contact regarding the report results. Marketing teams will work with the agent via phone, email or in person to respond to the carriers with answers to all allegations.
4. Through company reports, Premier will monitor the number of infractions and/or violations per agent for those under our hierarchy.
 - 4.1 The first infraction will be a phone call or email
 - 4.2 The second infraction will be a phone call or email



4.3 The third infraction will be reviewed with the compliance office and one functional owner to determine the severity of the infraction. If necessary the owner may recommend termination of the agent.

VI. Monitoring and Enforcement

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