



Centene Responsible Marketing & Sales Code

At Centene Corporation (Centene), we are focused on realizing our mission to transform the health of the communities we serve, one person at a time. We are committed to helping more people and communities gain access to high-quality healthcare – enabling them to live healthier lives. We maintain policies and procedures to support our mission to provide access to high-quality healthcare, innovative programs and a wide range of health solutions that help families and individuals get well, stay well and be well. Our marketing, sales and member engagement efforts align with Centene’s mission and are guided by the company’s values: Accountability, Courage, Curiosity, Trust and Service.

Centene provides accurate and balanced information regarding our products, services, and benefits. Our policies and guidelines are designed to ensure information about our plan offerings, services and benefits is accurate, honest and not misleading. Our work seeks to provide consumers with access to the information necessary to make timely and informed decisions as to whether to enroll in applicable products and services.

Centene’s policies require routine training for sales and marketing employees to ensure the compliant development and distribution of marketing materials and proper sales techniques. Centene is responsible for the content, form and method of distribution for marketing materials, ensuring sales and marketing requirements and guidelines are followed and met, regardless of who is producing, creating, designing or presenting the material and/or making a sale.

Centene’s marketing materials, advertising, and sales strategies are routinely reviewed to ensure compliance with Centene’s non-discrimination policies. Centene does not discriminate based on race, religion, age, gender identity, sexual preference, disability, or any other protected characteristic. Additionally, materials are reviewed to ensure compliance with language, accessibility and cultural competency requirements and are offered in alternative formats. We strive to keep our information and collateral simple and straightforward for all our stakeholders.

Centene ensures its marketing and sales policies are compliant with all applicable state and federal laws, regulations and guidelines concerning marketing and sales activities for health insurance. Promotional and non-promotional materials are reviewed and approved the Centene’s Compliance department prior to use. Additionally, where expected and as required by state or federal regulators, Centene’s policy is to submit materials to regulatory agencies for approval or review prior to use.

Centene requires its employees, representatives, agents and subcontractors to comply with ethical business practices and requirements to ensure information and materials are accurate and do not mislead, confuse or defraud recipients, members, healthcare professionals or government entities. To ensure ethical interactions, Centene’s policies require sales representatives, agents and brokers to disclose the nature of their working relationship with Centene and provide complete and unbiased information to prospective enrollees about the options available to them in their respective market.

All involvement with patient organizations is transparent, ethical and maintains the organization's independence. Centene directs subcontractors and anyone acting on behalf of the company to comply with corporate policies and procedures so that recipients receive accurate verbal and written information to make an informed decision on whether to enroll in products and services.

We review and update our policies and procedures annually (or as laws change) to ensure compliance with local, state, and federal laws and as part of our commitment to our mission to transform the health of the communities we serve, one person at a time.

POLICIES DETAIL:

Responsible Use of Artificial Intelligence (AI) In Marketing & Sales:

As an innovation-driven organization, Centene leverages AI technologies and machine learning within marketing to create more personalized experiences and streamline content creation to deliver meaningful engagement. Centene balances these efforts with rigorous human oversight that protects sensitive information and ensures consumer trust. Final decisions regarding campaign messaging, targeting, and personalization will remain with trained personnel to ensure ethical standards and compliance with regulatory requirements. AI tools used in marketing and sales processes will be routinely evaluated for potential bias to ensure they do not reinforce stereotypes or result in discriminatory outcomes. Centene designs AI/machine learning frameworks that incorporate ethical checkpoints throughout our marketing processes while committing to transparency in its use of artificial intelligence.

Brand & Direct to Consumer Marketing Safety Practices:

At Centene, we prioritize protecting our brand and the consumers we serve by upholding strict brand safety standards. These standards ensure our content does not appear in environments that promote hate speech, violence, illegal activity, or other harmful material. Additionally, we strive to place our sales and marketing materials alongside contextually relevant, positive content that aligns with our company values and these materials are guided by a deep understanding of our consumer and their media habits. We regularly review and monitor activities, content, and materials on social media and digital channels to ensure compliance with relevant codes and applicable laws.

Responsible Use of Social Media in Marketing & Sales:

As a community-focused organization, Centene leverages social media platforms to create authentic connections, deliver educational content, and provide responsive service to prospects and members. Centene balances these engagement efforts with transparent communication practices that respect privacy preferences and protect member information. Centene designs social media frameworks that incorporate ethical content review, respectful engagement, and clear disclosure of sponsored content throughout our digital interactions.

Commitment to Safe Data Practices:

As part of our ongoing commitment to regulatory compliance and enhancing our consumers' experience, we are on a journey to ensure that we protect our consumers' data and privacy. We believe that consumers have the right to determine how their data will be used and disclosed and support actions they can take to exercise data privacy rights.