

Centene's Vendor Code of Conduct

It is our policy to conduct business affairs in accordance with the standards and rules of ethical business conduct and to abide by applicable laws, both in letter and spirit. In this, there is no room for compromise.

- Michael Neidorff, Chairman, President, and Chief Executive Officer

We are committed to transforming the health of the community, one person at a time. Centene's commitment of delivering high-quality health services to at-risk populations has not wavered. Since our inception, we have never lost sight of the principles upon which our company was founded, including those that shape our focus on the environment, the health and social well-being of the communities we serve, and our culture of ethics and sound corporate governance.

Our expectation is that our vendors comply with relevant legal and regulatory requirements and partner with us by meeting the expectations described in this document. We will utilize these areas of focus to gauge the strength of our partnerships, in part, by the compliance and progress our partners make annually through requests for information, proposal and quote, master service agreements, quarterly business reviews, and questionnaires.

Environment

We believe the health of our planet is essential to the well-being of our members, employees, and the communities we serve. We are committed to being good stewards of the earth by making investments today that will deliver health benefits for years to come. The [Protect Our Planet](#) section of our Environmental, Social, Health, and Governance (ESHG) website provides further details around our interests and obligations to preserve our environment, including commitments to:

- Reduce waste and carbon footprint
- Conserve water
- Comply with environmental laws and regulations
- Protect at-risk areas from development and biodiversity loss
- Reduce and mitigate environmental impacts on human health

In the context of our supply chain, we have the following expectations:

Environmental Compliance

Centene expects all suppliers to operate in compliance with all federal, state, and local environmental requirements.

Environmental Footprint

Centene expects all suppliers to actively identify their environmental footprint, and pursue opportunities to reduce it. We support the implementation of initiatives to reduce carbon

emissions, save energy, save water, and reduce waste. For our critical suppliers, we collect environmental footprint data as a consideration for our procurement process, and look to engage with suppliers on environmental sustainability matters. This enables us to gather environmental data on a regular basis. We reserve the right to request environmental reporting from any supplier.

Social

Diversity, Equity and Inclusion (DEI)

We say that DEI is in our DNA. Since our founding, we have held the belief that diversity, equity and inclusion brings out the best in all of us. Centene's culture stems from a commitment to diversity, equity and inclusion, and this commitment remains our guide as we navigate into the future. Our efforts do not reside within a single business unit or level of leadership. They reach all aspects of our organization. As a result, we believe that every single employee and stakeholder, both internal and external, are agents of culture and influence the creation of an equitable society.

In our most recent [Diversity, Equity & Inclusion Annual Report](#), we shared some forward-looking commitments. Of specific relevance to our external partners:

Network Accountability

We will develop a set of diversity expectations for our vendors, contractors, providers, and other partners consistent with our internal commitment to diversity, equity and inclusion. We will continue to cultivate relationships within our communities and be intentional in our partnerships to advance supplier diversity.

We look forward to continuing to partner with our suppliers and other stakeholders to advance diversity, equity and inclusion in our communities.

Supplier Diversity

We believe that it is our responsibility to drive business opportunities for historically disenfranchised vendors. Our goal is to create a path for vendors to thrive within our supply chain. Through national/local supplier partnerships, we will foster strategies that include both prime and subcontracting relationships. We believe that by including our partners in our strategies we will increase the economic impact within our service areas.

We will track and measure our partners' supplier diversity programs for inclusive bidding practices and programming that provides small and diverse businesses with opportunities, skills, and experience to grow in a changing environment.

Human Rights and Labor

Our commitment extends far beyond health care: It is intrinsically a recognition of the fundamental rights and dignity of all human beings.

We believe that every person should be treated with dignity and respect. As such, we expect our suppliers to partner with us by sharing our commitment to human rights, found here:

[Human Rights Statement \(PDF\)](#)

Governance / Ethics and Compliance

Data Privacy and Security

Our commitments require us to maintain our members' trust. This trust includes leveraging information security practices to maintain the privacy of member data. Our privacy policies govern the collection and use of member data and describe the measures we take to protect information and how members may initiate inquiries and raise concerns regarding the collection, sharing, and use of their personal data. We have established procedures for responding to data incidents, including when and how to engage with internal management, stakeholders, and law enforcement.

Each party in our vendor relationships will maintain all of the other party's confidential information in strict confidence and will protect such information with at least the same degree of care that such party exercises with its own confidential information, but in no event less than a reasonable degree of care.

Conflict of Interest

Each of our vendors will ensure that their personnel do not have conflicts of interest with respect to Centene and the services provided. "Conflict of Interest" includes activities or relationships with other persons or entities that may result in a person or entity being unable or potentially unable to render impartial assistance or advice to Centene, or the person's objectivity in performing the contract work is or may be impaired, or a person has an unfair competitive advantage. Our vendors will, and will cause their subcontractors to, complete any documentation and perform any other actions requested or required by a government entity related to a conflict of interest certification or other government requirement.

Please contact us at the email address below if you become aware of any deviations from the expectations contained in this document.

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