

2025 Code of Conduct

A Guide to Doing What's Right

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Sarah M. London

Chief Executive Officer

Message from our Chief Executive Officer

Centene is a trusted, national leader in government-sponsored and subsidized healthcare programs. We've earned this trust by building collaborative relationships, operating with transparency, and by aligning our goals companywide and with our partners. We continue to strengthen that trust and leadership position by living our Mission of "Transforming the health of the communities we serve, one person at a time."

Guided by our Mission and our One CenTeam Values, our more than 60,700 CenTeamers serve over 28.6 million Americans, providing high-quality, affordable healthcare in all 50 states. In honoring this responsibility, Centene is deeply committed to integrity, ethical decision-making, and compliance.

Our Code of Conduct, approved by our Board of Directors, outlines our Values, expectations, requirements, and places to go for help in any situation, all to ensure we adhere to the highest ethical standards and fulfill the expectations of our government partners, our providers, our members, and one another. You should consider the Code your guide to doing what's right.

Each of us is accountable to ensure we understand and adhere to our Code. Be curious. Ask questions. And, if you are ever unclear what the right thing to do may be, I know you will have the courage to contact your People Leader and our Ethics & Compliance Department.

Thank you for working together to live our Mission and Values and drive excellence in all that we do—**together, as One CenTeam.**



Ashlee M. Knuckey

Chief Risk, Ethics & Compliance Officer

Message from our Chief Risk, Ethics & Compliance Officer

The power of One CenTeam is conveyed in how we show up in our communities, with each other, and for our members. To navigate our journey, our Code acts as our compass—guiding our actions, decisions, and behaviors. This year, we have simplified our Code and included real-world examples to help you evaluate whether actions and behaviors align with Centene's Values and requirements.

Our Code is critical to fostering trusted relationships. As Centene employees, each of us is obligated to adhere to this Code, no matter the circumstances. Doing what's right may not always be easy, but at Centene, it is essential. Centene maintains an environment of respect where questions and concerns can be raised without fear of retaliation or bullying. Reports made to Ethics & Compliance are confidential and may be made anonymously.

Not every instance of non-compliance is a question of ethics. In fact, often, we find non-compliance stemmed from innocent mistakes. If you see, suspect, or are unsure if how our work is being done meets the expectations of our Code or other requirements, reach out—not just because it's your responsibility, but also because we're relying on you to help us protect the millions of Americans we serve and ensure we live up to our commitments to our customers, regulators, and other stakeholders.

And remember, you are not alone. Reach out to our Ethics & Compliance team or me personally at (314) 505-6278 or ashlee.knuckey@centene.com at any time.

Following Our Code by Living Our Mission, Values, and Behaviors

The purpose of this Code of Conduct (Code) is to provide guidance on how to conduct business in alignment with Centene's Mission, Values, and Behaviors. We work diligently to earn and maintain the trust of our communities and to have a reputation for doing business the right way.

This Code has been approved by our Board of Directors and is applicable to all directors, officers, and persons employed by Centene Corporation and its subsidiaries (collectively "Centene" or "the Company"), as well as our subcontractors, vendors, stakeholders, and other interested parties. Each of us is expected to follow the Code and comply with all applicable laws, regulations, policies, and contractual requirements.

Mission

*Transforming the health of the communities we serve, **one person at a time.***

Values

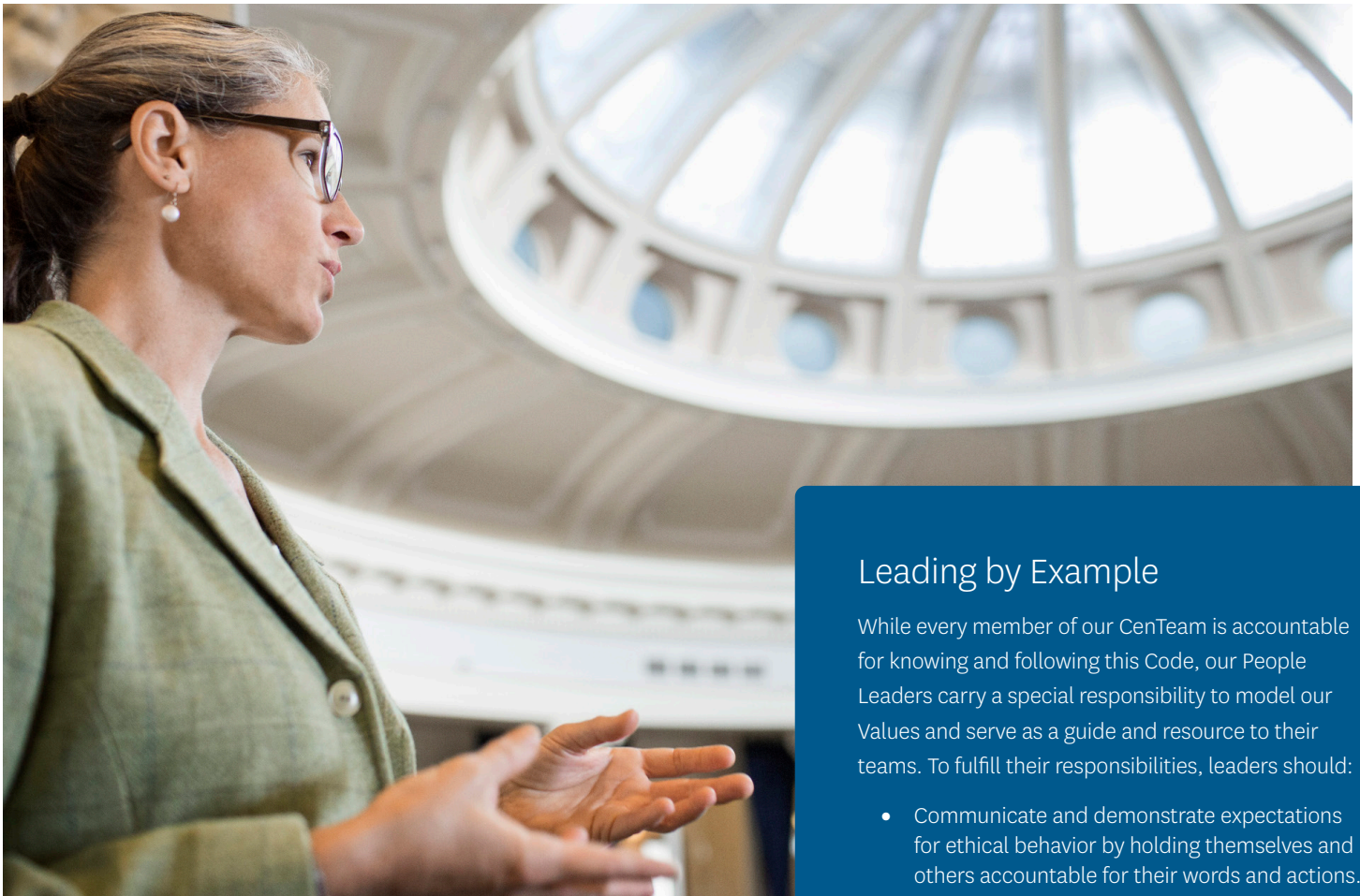


Behaviors

- We do what's right, not what's easy
- We go above and beyond for our customers and each other
- We listen and ask questions to create shared understanding
- We break down silos and bring each other to the table to find solutions
- We have candid, courageous conversations, with care
- We lead with authenticity and vulnerability
- We try new things and learn from failure
- We measure our success in the trust we build
- We celebrate winning together

“Living our Behaviors and bringing our Values to life by demonstrating them everyday in every corner of the Company is our collective call to action.”

– Sarah M. London



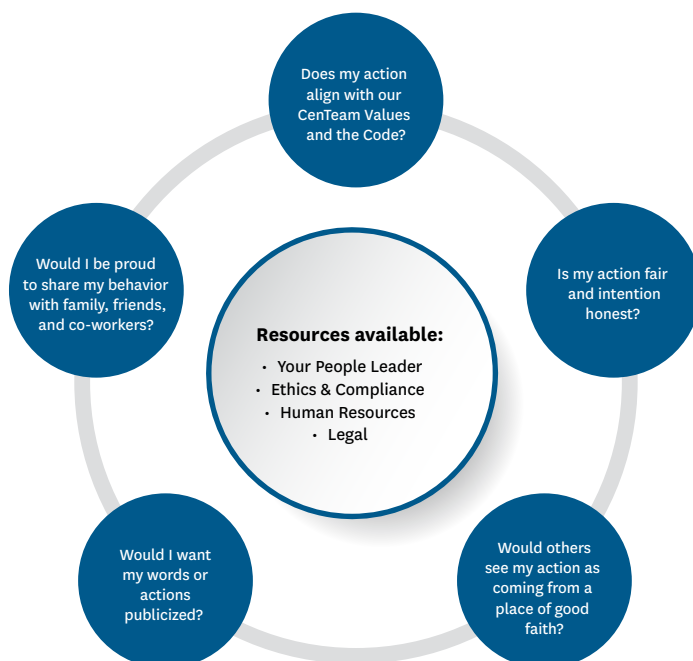
Leading by Example

While every member of our CenTeam is accountable for knowing and following this Code, our People Leaders carry a special responsibility to model our Values and serve as a guide and resource to their teams. To fulfill their responsibilities, leaders should:

- Communicate and demonstrate expectations for ethical behavior by holding themselves and others accountable for their words and actions.
- Ensure employees understand no business result is more important than ethical behavior.
- Talk with employees about the Code and Company policies, laws and regulations that affect their job responsibilities, including timely completion of required training.
- Maintain an open-door policy to support employee questions and concerns.
- Encourage ideas that promote and strengthen compliance.
- Be alert to any situation or action that may be unethical, illegal, or violate this Code and take prompt and appropriate action.
- Create an environment where employees feel comfortable raising questions or concerns and remind employees about Centene's non-retaliation policy.

Making the Right Decision

Sometimes, “the right thing” isn’t obvious or easy. Even though the Code and our Values are clear and provide guidance on expected behaviors, not everyone will view a situation in the same way. Use the prompts below to help guide your decision-making. And don't forget to seek support when you need it—there are resources to assist you.



Centene's Risk Management and Ethics & Compliance Programs

Through our robust Ethics & Compliance Programs, Centene offers guidance and support to assist all employees in understanding and following the Code and in escalating and resolving any concerns. The Ethics & Compliance Department manages written standards and policies, facilitates risk and compliance training, maintains multiple lines for communication and reporting (including a 24/7, independently administered helpline), conducts internal compliance monitoring and auditing, supports remediation of non-compliance, and recommends disciplinary action where needed. Ethics & Compliance team members are ready and willing to assist with any question or issue that may arise.

Centene's Enterprise Risk Management process ensures risks are systematically identified, assessed, and managed. Our directors, officers, employees, and other stakeholders play an important role in risk identification. By listening carefully, asking questions, and speaking up, employees shed light on potential risks and help define the opportunity to address them.

The Chief Risk, Ethics & Compliance Officer oversees all Risk Management and Ethics & Compliance Programs and keeps the Audit & Compliance Committee of the Board of Directors and the full Board of Directors updated, as appropriate. This oversight ensures accountability at the highest level.

Speaking Up

Our CenTeamers are both the best advocates for our Values and the most effective guard against non-compliant or unethical behavior. If you have any questions regarding whether something you see, hear, or plan to do is compliant with this Code or other requirements, speak up and ask! And if you become aware of conduct that may violate this Code or otherwise put the Company at risk, it is your duty to report it immediately.

When you report a potential ethics or compliance concern in good faith, you are not only meeting your obligation under this Code, you are helping the Company find and fix problems. This allows us to better serve the millions of people who rely on us for high-quality, affordable healthcare and leads to a more positive, engaging working environment for all CenTeamers.

How to Ask a Question or Report a Concern

Speaking up can take courage. To make it easier, there are many options available to you to ask an ethics or compliance question, or to report an ethics or compliance concern. You can choose what works best for you, depending on the situation or your comfort level.

Talk to your People Leader

They may be able to quickly resolve any questions or help escalate compliance concerns.

Contact your Compliance Officer Directly

All of our Compliance Officers have an open-door policy and are here to help.


Contact the Ethics & Compliance Department via email

Send a note to Compliance@centene.com. The Compliance team will connect you with the right resource to respond to or help address the situation.

Submit a Report to the Ethics & Compliance Helpline

Our 24/7 Helpline is administered by an independent third party and accepts anonymous reports. All reports are promptly reviewed by Compliance investigators.

Helpline: 1-800-345-1642



Whatever method you choose, make sure to raise any issue you see promptly. Failure to report an ethics or compliance issue is considered as serious as committing the offense itself and may result in disciplinary action, up to and including termination.

How Centene Handles Reports of Potential Ethics or Compliance Violations

While each situation is handled in the manner most appropriate, the following generally outlines our processes.

Investigation: The Company takes every report received seriously and, where appropriate, will conduct a prompt and impartial investigation. Depending on the circumstances, the Ethics & Compliance Department may coordinate with the Legal and/or Human Resources Departments, or with other stakeholders, to gather the facts or otherwise assess the situation. The Company may also engage independent counsel to assist an investigation.

If you are contacted in connection with an investigation, you must cooperate fully. This includes making yourself available for interview, providing timely, truthful, and complete information and documentation, and complying with the investigators' instructions regarding confidentiality, record retention, and any other matter.

Confidentiality: Any reports made to the Ethics & Compliance Department or Helpline raising concerns will be considered confidential, and care will be taken to protect the identity of the reporter, within the limits of policy and law. Note, however, that if a report is made anonymously, it may not be possible to fully investigate without further detail. If you make an anonymous Helpline report, check back in after a few days, as investigators may respond to your message seeking additional information.

Non-Retaliation: Centene policy strictly prohibits retaliation against anyone for, in good faith, raising an ethics or compliance issue, reporting any activity that appears to violate law, regulation

or policy, or cooperating in an Ethics & Compliance investigation. Forms of retaliation may include any action designed to deter reporting or cooperation, such as demotion, termination, suspension, reprimand, loss of job opportunities, threats, harassment, intimidation, or discrimination.

Any director, officer, or employee who knowingly retaliates against anyone for making a good-faith report may be subject to disciplinary action, including and up to termination of employment.

Are you aware of an action inconsistent with Centene's Code of Conduct?

Is any law or regulation being violated?

Did you observe a work process being performed contrary to Company policy or procedure?

Do you have a question regarding what Behavior our Code expects of you?

If any answer is yes, speak up! Contact Ethics & Compliance.



Resources for Questions or Concerns

There are many resources available to assist with questions or concerns:

Your People Leader can always be a first point of contact for questions or concerns

Ethics & Compliance Department

Guidance and Support for Issues Related to:

This Code

Laws, Regulations, Contracts, and Policies

Ethics and Integrity

Conflicts of Interest

Privacy

Internal and external reporting

Training

Unanticipated Regulator Outreach

Non-routine Audits, Exams, Inspections, or Interview Requests

- Helpline: 1-800-345-1642 (operated by an independent third party)
- Online: www.centene.ethicspoint.com
- Email: Compliance@centene.com
- Privacy Email: Privacy@centene.com
- Conflict of Interest: COL@centene.com
- Investigations: CIU@centene.com
- Letter: 7700 Forsyth Boulevard, St. Louis, MO 63105
- Chief Risk, Ethics & Compliance Officer: Ashlee Knuckey at (314) 505-6278 or Ashlee.Knuckey@centene.com

Reports are confidential and may be made anonymously.

Human Resources Department

Performance Management Questions or Concerns

Workplace Issues

Compensation/Benefits

Community Service

Job Opportunities

- AskHR at 1-833-GoAskHR (1-833-462-7547)
- Ticket via Request Central
- CommunityImpact@Centene.com

Special Investigations Unit

Suspected Fraud, Waste, and Abuse

Provider Billing Practices

- Special_Investigations_Unit@centene.com
- Fraud, Waste, and Abuse Helpline at 1-866-685-8664

Physical Security

Workplace Safety

Facility Access

- 1-833-CNC-SAFE (1-833-262-7233)
- Security@centene.com

Centene Secure

Cybersecurity-Related Training

Enterprise Crisis Management

Business continuity plans

- Report2Cyber@centene.com
- Centene.Secure@centene.com
- Crisis_Management@centene.com
- 1-833-34-CYBER (1-833-342-9237)

Government Relations Department

Political Action Committee

Involvement in Political Activities

- CentenePAC@centene.com
- Government_Relations_Guidance@centene.com

Employee Assistance Program (through Cigna)

Emotional Health

Work/Life Support

Legal Assistance

- mycigna.com
- 1-888-371-1125

Legal Department

Business-Related Legal Advice

Interpretation of Laws and Regulations

Subpoena/Warrant support

- Legal_Operations@centene.com

Communications Department

Speaking Engagements

Contact from the Media or Other External Sources

- CNET Communications page
- communication@centene.com

Consequences for Failing to Adhere to the Code

The Company takes adherence to our Code very seriously. Any suspected or identified violations of our Code or applicable laws, regulations, policies, or other requirements must be reported to the Ethics & Compliance Department immediately. All directors, officers, and employees must understand that at Centene, we care **how** results are obtained, not just that they are obtained.

Individuals who violate this Code may be subject to disciplinary action, up to and including termination of employment. When considering whether disciplinary action is appropriate and, if so, what disciplinary action to take, Centene will consider several potential factors, guided by our Values, to ensure consistent and comparable decision-making. These factors may include:



Accountability

- Did the employee take ownership of their actions in a timely manner and engage in constructive steps to correct the violation?
- Has the employee previously been coached or disciplined for any behavioral or performance-related issue? If so, did they follow through on prior commitments?



Courage

- Did the employee self-disclose the violation?
- Did the employee fully and honestly cooperate in any investigation related to the violation?



Curiosity

- Did the employee seek guidance from their People Leader or the Ethics & Compliance Department before engaging in the improper activity?
- Did the employee listen to the guidance provided and/or ask clarifying questions to ensure a shared understanding?



Trust

- Did the employee know, or should they have known, that their conduct was inappropriate?
- Did the violation involve an act of deception, including an effort to cover up the violation?
- Did the violation involve an abuse of the employee's power or position over another employee?



Service

- Did the violation harm or pose risk to the well-being of our customers, including any of our members or providers?
- Did the violation expose Centene to legal or compliance risk?

In addition to disciplinary action taken by the Company, an employee who fails to comply with applicable laws, regulations, requirements, or policies may be subject to civil and/or criminal liability.

Code Updates and Waivers

Centene's Code of Conduct is a guiding document, not a contract. While it sets the standards for expected behavior, it does not guarantee employment. Changes to the Code can be made at any time.

Any exceptions to the Code must be reviewed by your People Leader and, if deemed appropriate, approved by the Chief Risk, Ethics & Compliance Officer. Exceptions for directors or executive officers can only be approved by Centene's Board of Directors and will be disclosed as required.

By understanding these protocols, we ensure clarity and uphold the integrity of our Code. This approach ensures everyone is on the same page and any deviations are managed transparently.

Acting with Honesty and Integrity

Through our work as a national leader in government-sponsored healthcare programs, our Company is vested with a public trust. We are required and expected to make responsible use of taxpayer dollars, accurately and transparently account for our work on our customers' behalf, and deliver on our commitments.

To honor that trust, we must always act in accordance with the highest standard of honesty and integrity. At a minimum, this means ensuring our books and records are accurate and complete, recognizing and attending to potential conflicts of interest (including those related to giving and receiving business courtesies), and being vigilant in detecting, preventing, and correcting instances of non-compliance or fraud, waste, and abuse in our own practices as well as the practices of our providers and business partners.

Financial Integrity and Internal Controls

Our Company operates in a highly regulated environment, and the records of our business practices, including our financial bookkeeping and accounting, claims-related activity, and member and provider interactions, must be accurate, complete, and clear. No matter your role with the Company, you must:

- Ensure any documents you create or modify represent an accurate, complete, and clear record of the facts.
- Exercise diligence in your reviews and avoid “rubber-stamping” approvals. You are accountable for any document you review and approve, even if the document did not originate with you.
- Hold yourself and your team members to the highest standard of quality. It is not enough that the accuracy, completeness, and clarity of a record represents our “best effort.” The record must be **right**.
- Comply with all applicable laws, regulations, contractual requirements, and policies regarding the content, format, and submission of Company records. Even an accurate record may place the Company at risk if the record fails to adhere to applicable technical specifications.
- Seek guidance if you have questions or are unsure what to do. The requirements, particularly with respect to financial reporting, can be complex. Your People Leader, Legal counsel and the Ethics & Compliance and Internal Audit Departments are available to assist you.

Conflicts of Interest

Conflicts of interest can occur when personal situations create an actual, potential, or perceived conflict between the Company's best interest and an individual's own personal or outside business interests. Conflicts can also occur within the Company, where the activities of one part of the business could create a barrier to opportunities for other parts (referred to as “Organizational Conflicts of Interest”). Serving our customers with integrity means that we all must put our personal interests aside and make decisions that best advance the Company's mission.

All Centene team members are expected to know and follow our Conflict of Interest policy so they may recognize potential conflicts and promptly disclose and address them. Upon hire and annually thereafter, all directors, officers, and employees complete a Conflict of Interest disclosure. A disclosure doesn't necessarily mean that a conflict exists. Instead the disclosure offers the Company an opportunity to review the circumstances and consider whether steps can be taken to reduce risk.

Examples of Conflicts of Interests that Require Disclosure:

- Working at an outside job that interferes with your position at Centene or competes with the Company.
- Using Centene information for your own personal gain or to benefit a family member or another company in which you have an interest.
- Serving as an officer or director of, or having ownership interest in, another company that does business or competes with Centene.
- Having a romantic relationship with an employee who you supervise or who is in your line of supervision.
- Employing relatives or close friends who report directly to you.
- Being closely related to someone such as a vendor or customer who has sought or is seeking a financial relationship with Centene.



Exchanging Business Courtesies

A particular kind of potential conflict of interest may arise involving the offer or acceptance of gifts or entertainment (sometimes referred to as “business courtesies”). A business courtesy may take many forms—for example, courtesies may include meals, event tickets, travel reimbursement, employment opportunities, gift cards, or even a holiday gift basket. Exchanging business courtesies responsibly and in compliance with applicable laws and policies is a normal, acceptable part of building strong business relationships. But care must always be taken; depending on the circumstances, giving or receiving business courtesies may create an appearance of conflict of interest or even violate the law. Giving or receiving bribes, including soliciting or offering charitable contributions or other forms of payment designed to improperly influence decisions, is never acceptable.

Before giving or accepting a business courtesy, always check with your People Leader. Though each situation depends on the circumstances, giving or receiving gifts valued at over \$150 or cash equivalents in any amount is generally not permitted.

Further, extra caution must be taken in any situation involving a healthcare provider or government employee or official. Business courtesies given to or received from providers or government employees may be subject to specific anti-kickback and anti-bribery laws and other ethical standards that impose strict limitations on acceptable gifts. No employee, or anyone acting on behalf of the Company, may offer or give anything of value for the purpose of improperly influencing a government or private contract, award, or legislation, nor may anything of value be given or received in a manner that may give the appearance of attempting to improperly influence such action.

Closely review the Conflict of Interest policy for additional guidance regarding business courtesies, and reach out to your People Leader and the Ethics & Compliance Department before offering or accepting any business courtesies that don’t clearly fall within the safe boundaries articulated in the policy.

Fraud, Waste, and Abuse

Centene protects our members and reduces the overall cost of healthcare by preventing, detecting, and correcting fraud, waste, and abuse (FWA). We have a comprehensive FWA program, led by Centene's Special Investigations Unit (SIU) and supported by Program Integrity functions throughout the Company. FWA can result from inappropriate employee practices, too, such as falsifying expense reports or misdirecting Company funds.

FWA is not only unethical, it is illegal. Actual or suspected FWA, other illegal misconduct, or violations of this Code must be reported promptly. In addition to notifying your People Leader, you should also report through one of the following channels:

- SIU at Special_Investigations_Unit@centene.com
- FWA Helpline at 1-866-685-8664 or www.centene.ethicspoint.com
- Ethics & Compliance Department at Compliance@centene.com

Each Centene employee is required to complete annual FWA training to understand the importance of our program and their own role in preventing, identifying, reporting, and correcting FWA.

Recognizing FWA

By remaining vigilant and thinking critically about what we see and hear, Centene's team members often provide the first, best line of defense against FWA. Examples of indicators that may suggest potential FWA include:

- Unusual claim patterns, like repeated duplicate claims, unexpected cost spikes, or apparently impossible billing (e.g., more than 24 hours of service in a day).
- Unexplainable member reports of unrecognized claims on their explanation of benefits (EOB) or service verifications.
- Documentation that appears unprofessional, is riddled with errors, or is inconsistent with past practices.
- Expense/mileage reports that seem unreasonable or inconsistent with the submitting employee's job duties.

Employment Prohibitions

As a provider of government-sponsored healthcare programs, Centene will not employ or contract with anyone who has:

- Been excluded from participation in U.S. healthcare programs
- Been convicted of certain crimes
- Pled guilty or "no contest" to certain crimes

Additionally, to remain compliant with regulatory and legal requirements, employees must immediately notify their People Leader when any type of license that is required to perform their job expires, is revoked, or suspended. Examples of such licenses include:

- Motor vehicle
- Professional
- Clinical



Ask a Compliance Officer – Acting with Honesty and Integrity:

Q Part of my job involves collecting and submitting data to populate a report that is filed with a government agency. What responsibility do I have to make sure that the information I provide is both accurate and responsive?

A Centene and its subsidiaries and affiliates submit thousands of reports every year to government agencies, auditors, and others to comply with legal, regulatory and contractual requirements, and communicate aspects of our business performance. Everyone who contributes to the preparation and submission of a report or other data is accountable for ensuring the data they collect and communicate is accurate and responsive to the purposes of the report or request.

At each step in the process, each participant should ask, “Is this information correct?,” “Does it answer the questions asked?,” and “Is it formatted and presented according to requirements and in a manner that is clear and easy to understand?”

Q In my role as a care manager, I have regular calls or visits with our members, but I’m too busy to get everything done every month. I feel like I need to take shortcuts to save time. Can I:

- **Skip a call or a visit but mark it completed anyway if I think that member doesn’t need immediate help?**
- **Hang up the phone quickly, before the member has a reasonable chance to answer, and then mark the attempt as “unable to contact?”**
- **Copy and paste notes from one member visit to another to reduce data-entry time?**
- **Ask only a portion of the required Health Risk Assessment questions, if some don’t seem important?**

A No. Our team members who interact directly with our members, including care managers, patient care advocates, and many others, play a critical role in ensuring our members receive timely, necessary care. Our members count on us to check in with them and help them get the services they need.

Diligent efforts must be made to complete all calls and visits on time, and visit notes must be accurate, individualized, and complete. Cutting corners or misrepresenting whether or when a contact occurred not only is unethical and violates policy, it may also put our members’ health in danger.

Q I’m reviewing past reports in connection with an ongoing accreditation audit. There are a few reports responsive to the request that don’t look so good—they show that our team didn’t follow the requirements. Can I just leave those out of the audit submission? The auditor would never know they were missing.

A No. We must supply accurate, complete records in response to audits and other reviews, whether or not those records cast us in a favorable light. Missed requirements or other errors may lead to adverse audit findings, but mistakes can be remediated and processes improved. A reputation for honesty and integrity, however, is much more difficult to rebuild if trust is lost.

Q My nephew works in the administrative services department of a major hospital system in our health plan’s network. He called me the other day to let me know that he and his colleagues were having problems accessing our provider portal. Can I help him escalate the issue and find a solution?

A Let your People Leader know about the notification and remind them of the relationship (even though this should already have been disclosed, a reminder is helpful). Your People Leader may screen you out of further work on this issue, given the personal relationship, but they should engage the right people to communicate with the hospital, troubleshoot the issue, and resolve the problem. When communicated transparently, the contact from your nephew wouldn’t pose a conflict at all. Instead, it would advance the Company’s interest by giving the Company an opportunity to correct an issue.

Q A longtime vendor partner has invited me to attend a two-day conference they are hosting in Las Vegas. They have offered to cover not just the attendance fee, but also the cost of my round-trip flight from St. Louis, two nights in a hotel, and lunch and dinner both days. Can I attend?

A Perhaps, though some modifications may need to be made to the payment arrangements, depending on the circumstances. Accepting travel invitations from third parties, such as vendor partners, may create the appearance of a conflict of interest, especially if your role puts you in a position to influence whether that vendor could extend or expand its business with the Company. Before accepting any offer from a third party to pay for your business travel, seek guidance from your People Leader and submit a disclosure to the Ethics & Compliance Department.

Q I was out to dinner with friends recently and picked up the check. I was distracted by the conversation and accidentally handed the server my Company credit card rather than my personal card. Am I in trouble?

A Reach out to your People Leader and explain what happened. Honest mistakes occur, and by taking accountability for the error, this situation can easily be corrected by arranging to timely pay the credit card bill yourself. Failing to disclose the error and submitting the expense for the Company to pay, however, would constitute a violation of our Code and potentially lead to disciplinary action.

Q Why was my request to attend an event or receive a business courtesy denied when I know that someone else was approved for something similar?

A When requests to give or receive business courtesies are submitted, the Conflict of Interest team reviews all the circumstances, including the value of the courtesy, who is paying for what, and whether the courtesy is offered and received in a manner consistent with standard practices in light of the giver's and receiver's role.

With respect to trips and events, the employee's role is a relevant factor, as some of our employees are responsible for building and maintaining positive relationships with business partners and attend external events with third parties, sometimes at the third parties' invitation and expense, as a normal part of their jobs.

Q An audit team from the state insurance department is on-site at my health plan's main office conducting a multi-day document review. One of the auditors just walked up to employees and asked, "What are we having for lunch?" When we said that we thought we weren't allowed to pay for their food, he insisted that policy had been changed. Can we order pizza for him and the other auditors?

A Check with your People Leader and Compliance Officer before offering any business courtesy, including paying for a meal, to any government employee, even if the government employee insists there's no policy preventing you from treating him. The employee may not be aware of applicable restrictions, and violating gifts-related laws or regulations may subject you and the Company to significant risk.

Q I've been invited to participate in a survey interview with a healthcare research firm. They are interested in my perspective on trending topics in the healthcare industry. They're offering me \$200 as an "honorarium" for my time and insight. Can I participate?

A Generally, no. It is not unusual for our employees to receive unsolicited invitations to participate in "research surveys," often in exchange for a few hundred dollars (or a gift card or similar perk) as compensation. Frequently, these companies find their leads on social media sites, such as LinkedIn.

Recipients should be wary of such invitations, as responding could reveal Company strategy, confidential information, or even expose the Company to cybersecurity risk. Before answering any unsolicited invitation for a research survey, obtain approval from your People Leader and via the conflict of interest disclosure process.

Q I noticed some unusual things on a claim submitted by a provider. The services provided don't match the provider's specialty and are inconsistent with the member's diagnoses. Should I report my suspicions?

A Yes, all concerns about potential fraud, waste, and abuse should be immediately reported to the SIU. The SIU will evaluate the situation and determine the appropriate actions to take to ensure any potential FWA or quality of care issues are identified.

Supporting Policies

- Conflict of Interest (CC.COMP.13)
- Fraud, Waste, and Abuse Plan (CC.COMP.16)
- Speaking Up (CC.COMP.03)
- SOX Control Self-Assessment (CC.IA.06)
- Claims Audit (CC.IA.11)
- Travel & Business Expense (CC.FINC.02)
- Financial Report Policy for Health Plans (CC.FINC.31)
- Gifts to Government Officials (CC.GOVR.07)
- Compliance with State & Local Pay to Play Rules (CC.GOVR.08)

Protecting Our Assets and Information

One of Centene's greatest strengths is the power of One CenTeam's innovative approach to serving its members. To build on that strength, Centene trusts each of its employees to manage and protect all sensitive business information and property in accordance with law, regulation, contract, and policy.

Our team members interact daily with many different types of highly sensitive information. Critically, we work with our members' Protected Health Information, or "PHI." We have a legal responsibility to safeguard our members' PHI and ensure that we use and share it only as needed. Additionally, our team members generate and communicate a tremendous amount of valuable, confidential, and proprietary information—that is, information that sets us apart in how and with whom we do business. We must all handle this information with care, both to preserve our Company's competitive advantage and to ensure compliance with laws, regulations, and policies regarding fair competition and the permissible use of non-public business information. Examples of confidential and proprietary information include:

- Member, customer, and business partner lists
- Health information of employees and members
- Agreements between Centene and any external party, including providers, brokers, vendors, and the government
- Formulas, pricing, or cost information
- Sales-related information
- Policies, procedures, contracts, and/or trade secrets of any kind
- Copyrights, patents, trademarks, trade secrets, logos, expertise, and other intangible property (intellectual property)
- Potential merger and acquisition information

Finally, we must keep in mind that the work an employee does or creates for the Company belongs to the Company, not to the employee personally. All confidential or proprietary information and intellectual property pertaining to Centene or one of Centene's subsidiaries or affiliates belongs to the Company and may not be taken or used for non-Centene business at any time, even when employment ends.

Inside Information about Centene

Employees who have access to confidential or non-public information are not permitted to use or share that information for stock trading purposes or other non-business purposes that might result in personal financial benefit or to serve as a "tip" to others.

Using inside information in this manner violates our Code, Centene's policies and the law. "Inside information" is any non-public information that a reasonable investor is likely to consider important in making investment decisions.

Examples of inside information include:

- Financial information, whether positive or negative
- Merger, acquisition, or divestiture information
- Any significant sale of assets
- Planned changes in leadership
- New products or services
- Gain or loss of a contract, provider, vendor, or customer
- Litigation and investigations

We must not buy or sell Centene securities if we are aware of non-public inside information, and we cannot share inside information with family, friends, or others, nor encourage them to act based on inside information that we have. Prior to buying or selling Centene securities, employees and directors should ensure compliance with our Insider Trading Policy. For questions regarding our Insider Trading policy, contact the Legal or Ethics & Compliance Departments.





Antitrust and Fair Competition

Fair competition laws, including antitrust provisions, exist to ensure consumers enjoy a variety of product choices at competitive prices. Centene will strictly comply with all fair competition laws, regulations, and policies. But even where the law is permissive, we will hold ourselves to the highest ethical standard, guided by our Values.

We compete by building **trust**, holding ourselves **accountable** to the commitments we make, and offering exceptional **service** to our customers, not by cutting corners or crossing ethical lines.

Ensuring fair competition requires that we:

- Use caution in communication with competitors, no matter the setting. We must avoid any discussion that may appear to unreasonably interfere with fair competition, especially with respect to market opportunities, pricing, rates, compensation, or other sensitive business topics.
- Refrain from soliciting, sharing, or using confidential or proprietary information belonging to a third party, including a competitor, vendor, or supplier, for any unauthorized purpose.
- Be careful when working or discussing work in a public setting, where sensitive business information may be inadvertently exposed.
- Seek guidance from Ethics & Compliance and Legal Departments whenever questions arise.

Appropriate Use of Company Assets

Company assets include business equipment, electronics, office supplies, buildings, data and records, credit cards, and phones. These assets are to be used professionally and productively to conduct our business.

Centene has the right to review, retain, investigate, access, and disclose any use of a Company asset. This includes emails, instant messages, telephone communications, internet activity, electronic attachments, and other information and/or data.

Remember, Centene owns all Company assets and any information stored on the assets. Centene may review those assets at any time in connection with legitimate business needs. Permanent electronic records are created on devices. Exercise care when using a Company account for any personal communication, and advise friends and family to contact you using your personal phone number or email address rather than through Company accounts.

The contents of Company assets may be disclosed to approved internal resources and/or external resources, such as law enforcement, government officials, and legal counsel, without your knowledge or permission.

Examples of Improper Use of Company Assets:

- Browsing on the internet for personal purposes for an unreasonable amount of time.
- Using your Centene email for personal communications.
- Making online personal purchases using Company computers or phones.
- Conducting personal communications via text, photos, or calls on your Company phone.
- Using your Company credit card for any personal purchases or transactions.

Personal accounts, including personal email and text-message accounts, should not be used to conduct Company business. Personal accounts often lack the security and privacy features we rely on to keep our sensitive information safe. And a personal account may be subject to search if there is reason to think it contains business information relevant to a civil or criminal review.

AI Usage at Centene

Centene is committed to the responsible and ethical use of artificial intelligence (AI) and other new technologies to enhance our services, enrich customer experiences, and improve health outcomes.

Our AI systems are designed to uphold the highest standards of transparency, fairness, and accountability. We continuously monitor and update our AI risk management practices to align with evolving legal requirements and industry standards. By fostering a culture of ethical AI usage, we aim to build trust with our customers, investors,

and other stakeholders, ensuring that our AI-driven solutions contribute positively to the healthcare industry.

Employees are expected to use AI responsibly, avoiding any actions that could lead to biased decisions, data breaches, or misleading communications with regulators, members, providers, and employees. This includes using only approved AI platforms, following Company-provided guidelines for appropriate use, and maintaining the confidentiality and integrity of the data involved. Any concerns related to AI usage should be reported through the Ethics & Compliance Helpline or to AI@centene.com. Your prompt reports will help us ensure our AI systems remain secure and trustworthy.



Information Security and Data Protection

Every Centene employee creates, receives, shares, and stores information in the normal course of business. Our information is a significant asset and must be carefully managed and protected.

Centene holds itself accountable for safeguarding information of our members, providers, vendors, and partners. This includes complying with all laws and regulations regarding Protected Health Information (PHI) and Personally Identifiable Information (PII). Any confirmed or suspected breach of regulated data must be reported immediately to Centene's Privacy Officer or the Ethics & Compliance Department.

The Company has data management and retention policies to ensure all records are kept for the legally and contractually required amount of time. "Records" may include information stored via paper, electronic, audio, or video media. Employees are responsible for understanding the record retention schedule for our records and should never alter or destroy any records that may be needed to comply with our government contracts, legal, or investigation processes.

Examples of Putting our Information and Data at Risk

- Sharing more than the minimum necessary information with others who don't need this protected data to do their job.
- Sending Company information to a personal device or account, including a computer, printer, tablet, phone, personal email account, or non-approved external application (such as a non-approved Generative AI job assistant).
- Clicking on links or attachments within external emails without confirming their source.
- Not protecting and securing electronic information prior to sending outside the Company.
- Disposing of Company records (electronic and/or hard copy) without consulting the record-retention policy.

Procurement

Centene follows a fair, honest, and objective procurement process. We apply consistent, transparent criteria in decision-making, conduct thorough due-diligence, and hold our vendors accountable for their performance and adherence to our Code, including through our Vendor Sustainability Code. In selecting third-party partners, we take care to avoid even an appearance of improper influence or bias.

Negotiating the vendor landscape and selecting the right third-party support for the Company can be challenging. Fortunately, no one is expected to navigate this process alone. By bringing our experts in the Procurement Department to the table to support each potential engagement, we ensure the Company contracts with the right third-party partners, the right way, at the right price.



Remember to always safeguard information. Even if you have access to a system or confidential information, you should only access or view the information necessary to perform your job.

Ask a Compliance Officer – Protecting our Assets and Information:

Q I need to review a report and would really prefer to work in paper, but I work remotely and do not have a Company-issued printer. Can I send the report to my personal email so I can print using my personal printer?

A No. Do not forward any Company-related work to your personal email account, as such accounts lack the security safeguards that are maintained on our Company systems and expose information to additional risk.

Q I recently joined Centene's Sales team after having worked in Sales at a competitor company. I'm still close with a number of my former colleagues, and one reached out to me to ask if I was interested in comparing lead lists so we wouldn't "step on each other's toes." What should I do?

A Your friend's suggestion involves sharing Company confidential and proprietary information and may violate one or more fair-competition laws. You should decline his offer and immediately report the situation to our Ethics & Compliance Department for further guidance.

Q My friend is a Centene member and asked if I could update their health screening information in our system. I work in Care Management and have access to the information. Can I help my friend?

A No. You may only access and update information consistent with the responsibilities of your role. You should help your friend by putting them in touch with their assigned Care Manager or Customer Service.

Q There is an AI tool that I use at home that I think can help me be more productive at work. Am I allowed to use that AI tool with my personal account to do my job?

A No. Only Company-approved software or applications may be used to conduct Company business. Any Company-approved AI tools must be used with your Company credentials. Company information may not be used in any of your personal accounts. This ensures the protection of confidential data and work product in alignment with regulatory requirements and Company policies.

Q A contracted vendor has presented my department with a new AI product offering that will improve our service performance while reducing costs. We would like to implement this new AI product as quickly as possible. Are we able to have the vendor turn this AI product on for us?

A Before pursuing any new AI-related idea, you need to connect with the AI Governance Committee at AI@Centene.com. The Committee, in collaboration with Business Technology Services and other key business stakeholders, can help assess the proposed approach for feasibility, effectiveness, and compliance with critical legal, regulatory, and ethical requirements. The Committee may also be able to recommend an already-approved solution that might work for you.

Q One of the vendors my department works with wants to demo a new product that could improve performance and outcomes. The vendor has asked me to send some data, including operations and comparative pricing data, to help me assess the product and build a business case. The requested data goes beyond the data set this vendor normally receives, but this seems like it could be really good for the Company. Can I send the additional information requested?

A No. Our contracts with vendors are specific to the services they provide and the types of data involved. Sending the vendor additional information outside the scope of those agreements could put the Company and the data at risk. Consult your People Leader and the Procurement Department before engaging with any vendor for additional services and information requests.

Q I offer technical support to a provider outreach team at our health plan, and in an effort to make their work more efficient, I developed an innovative program that automates and documents parts of their process. I did a lot of coding work on my own time—many nights and weekends. If I leave the Company, can I take this code with me and market it?

A As a general matter, intellectual property, including new programs, applications, or processes that you develop in the course of your work with Centene, belongs to the Company, not to you individually. If you move on to other opportunities, the work product you created while working for the Company must remain with the Company and cannot be transferred into your personal possession or used by you to advance your personal interests.

Q I am a fully remote worker and generally work in a private space at home. But today my internet went out, and I still have a lot of work to do to meet a critical deadline. Can I go to my local coffee shop and finish my workday?

A Maybe, but precautions must be taken. Working in public locations creates a number of information security risks. Bystanders might see or overhear sensitive business information, and public networks frequently are not secure. The best solution would be to travel to a nearby talent hub and work from a hoteling space. If no talent hub is available nearby, discuss suitable options with your People Leader before conducting work in a public space.

Q One of my longtime co-workers recently left Centene for a job at another healthcare company. We keep in touch, and recently he sent me a note describing an initiative he is excited to be working on at his new job. He attached a project deck that includes some specific information for their company, including market-research data and rate information for his company's business partners. The deck isn't marked as confidential—can I share this with my colleagues or use it myself?

A No. You may not use or share the information you received, and you should advise your former co-worker not to share such information with you in the future. Non-public information relating to a company's business strategies, research, pricing, negotiations, etc., is likely confidential and/or proprietary, whether or not it is specifically marked. We compete with integrity, and that means that we won't take advantage of the confidential or proprietary information of others for an unauthorized purpose, even if such information came to us unsolicited.

Supporting Policies

- Insider Trading (CC.COMP.01)
- Identity and Access Management (CC.INFOSEC.01.00)
- Acceptable Use of Assets (CC.INFOSEC.07.00)
- Information Governance (CC.COMP.09)
- Administrative Firewalls (CC.COMP.15)
- Disclosing and Requesting Only the Minimum Amount of PHI Necessary (CC.COMP.PRVC.09)
- Financial Report Policy for Health Plans (CC.FINC.31)

Ensuring Appropriate Communications and Public Engagement

In fulfilling our mission to “Transform the health of the communities we serve, one person at a time,” Centene takes pride in the engagement of our team members in the communities themselves.

To best serve the needs of the Company and its customers, Centene directors, officers, and employees must take care to ensure that all public-facing communications and engagement are performed in compliance with applicable requirements, which often means drawing clear, transparent boundaries between activities conducted on behalf of the Company and activities conducted in a team member’s personal capacity. Company employees should never present themselves as speaking for or acting on behalf of the Company without proper authorization.

Media Requests and Speaking Engagements

Centene’s team members are leaders and innovators in healthcare and may be asked to speak to the media or offer a presentation to third-party groups or the public, including at industry meetings, business fairs, and educational conferences.

All Centene information provided to external sources, including the media, occurs through our dedicated spokespersons to ensure timely, accurate, and complete responses. If you are contacted by any member of the media, immediately reach out to the Communications Department at your local business unit or the Corporate office prior to responding.

Similarly, if you are invited to speak to an external group on behalf of Centene or on a topic related to your work for Centene, notify the Communications team prior to accepting the invitation. This team will review the request and proposed materials and coordinate with the Ethics & Compliance Department to ensure that the speaking opportunity aligns with the Company’s position and does not create potential conflict-of-interest risk. To request approval, complete the Speaking Engagement request form, available on the Communications team site on CNET.

Social Media Use

Social media has created a platform through which anyone can easily communicate publicly with a worldwide audience. While our employees are free to use social media in their personal lives, choosing to engage in social media comes with responsibilities. It’s important to keep in mind this Code and Company policies as you participate in social media, especially:

- Absolutely no disclosure of confidential and/or proprietary information is permitted.
- Ensure it’s clear that any views expressed are personal and do not represent Centene.

- Think carefully about what you communicate; do not post content that is harassing, discriminatory, or threatening.
- Do not share or post any photos containing Centene information, assets, or material without first receiving approval from the Communications Department.



Restrictions on Using Company Resources to Support Political Candidates and Causes

Centene is committed to being accountable when participating in political processes. As a business, Centene expresses its views on issues that affect its operations and may, in certain circumstances, make corporate contributions to political candidates or office holders.

Centene respects your right to participate in political activities on your own personal time. Employees must strictly follow the Company's policies on political activities and contributions. The Centene name, property, or other resources may not be used in any way to support personal political activities.

These prohibitions do not prevent eligible employees from contributing to the Centene Political Action Committee (Centene PAC) if they choose to. For more information on the Centene PAC or political activity policies, contact the Government Relations Department.

Green-Friendly Workplace

Centene believes that environmental citizenship is an important aspect of the health of the communities we serve. We are committed to minimizing the impact on the environment through our own actions. Our headquarters was built to Leadership in Energy and Environmental Design (LEED) Gold certification standards. Centene Plaza was constructed on a previously developed site in an urban setting, which allowed the project to take advantage of existing infrastructure. The Company encourages all employees to engage in green practices where possible, including through participation in recycling and other environmentally focused initiatives.

Community Service

Through Centene's Foundation, the Company and its employees contribute time and financial support to non-profit organizations whose work aligns with Centene's mission. This support includes community service, grant awards, board participation, donations, and sponsorships. Centene encourages all employees to participate in Company-sponsored initiatives, as well as other initiatives in their local communities, through the Community Impact Program. The Community Impact team can help identify opportunities that align with each employee's interests and abilities. Keep in mind that employees should not participate in community engagement activities on behalf of the Company without first receiving approval from the Community Impact team.



Human Rights

At Centene, we believe in conducting our business affairs in accordance with the standards and rules of ethical business conduct, which includes zero tolerance for the denial of basic human rights. The “denial of basic human rights” includes, but is not limited to, a lack of access to food, water and sanitation, human trafficking, forced labor, child labor, discrimination, and other illegal and unethical activities. Centene and its affiliates are unequivocally committed to supporting the International Bill of Rights and the International Labor Organization's Declaration on the Fundamental Principles and Rights at Work.

If you have any concerns regarding human rights issues at the Company or at any entity the Company does business with, contact the Ethics & Compliance Department.

Ask a Compliance Officer – Ensuring Appropriate Communications and Public Engagement:

Q As part of my job, I review prior authorization requests to ensure the requested services meet all applicable requirements. This morning, I received a call from a reporter asking to interview me. She said a provider had contacted her and complained about a denial recommendation I had made. How should I respond?

A Let the reporter know Company policy requires all media requests be addressed by our Communications team and ask for the reporter's contact information so you can promptly pass the request on. Then reach out to your People Leader and to the Communications Department to inform them of the reporter's outreach.

Q I'm planning to run for elected office. I'll make sure all campaign activities are conducted on my own time, and I won't mention that I work for a Centene health plan. Do I need to let my People Leader know?

A Yes. You need to inform your People Leader and the Government Relations and Ethics & Compliance Departments about your intention to run for office. Centene and its subsidiaries are subject to laws and regulations strictly defining political activity conducted by or on behalf of the Company. Even if you don't mention your Company affiliation, you can expect your place of employment to become public knowledge in a campaign. Depending on your particular role and the state that you live in, certain safeguards or mitigation actions may need to be taken to prevent the appearance of Company sponsorship or support for your candidacy and ensure that your work duties cannot be mistaken for campaign activity.

Q I attended a political party meeting to discuss proposed initiatives for an upcoming election. Specifically, I expressed concerns about proposed changes to the state health exchange program. Did I violate Company policy by expressing my views?

A You are free to participate in the political process and share your personal views as a private citizen. You must take care, however, to ensure that your personal views cannot be misunderstood as representing the views or position of the Company.

Q My hometown just suffered from a natural disaster. A few co-workers and I would like to go volunteer in the rebuilding and relief efforts, while wearing our Centene apparel, to show Centene's commitment to our communities. Is this ok?

A Thank you for your willingness to help your neighbors in a time of need. This may be allowable, but first coordinate with the Company's Community Impact team. Not only do they manage the various Company-associated volunteer projects, but they may be aware of additional information or projects that could help make your service effort even more impactful.

Q I've been asked to speak as a guest at a meeting of the state Physicians' Association to talk about our health plan, processes, and collaborative approach. May I speak at the meeting?

A Before accepting any speaking invitation, check in with your People Leader, the Communications Department, and Ethics & Compliance, and share an outline of your intended remarks. When speaking at a forum like this, you will be perceived as representing the Company. It is essential everything you say is accurate and consistent with the Company's position.

If you do participate as a speaker or panelist at a public event, be especially careful in unscripted question-and-answer segments. Do not speculate, guess at an answer, or talk casually about Company process or policy. You may not have a full understanding of the facts, and your comments may be misconstrued, misunderstood, or taken out of context, leading to risk and confusion.

Supporting Policies

- Media Relations (CC.COMM.01)
- Speaking Engagement / Opportunity (CC.COMM.24)
- Social Media (CC.COMM.21)
- Individual Political Contributions (CC.GOVR.02)
- PAC Contributions (CC.GOVR.04)
- Political Activities and Events (CC.GOVR.05)
- Use of Federal and State Funds for Political Activity (CC.GOVR.10)

Creating and Maintaining an Inclusive, Safe, and Responsible Work Environment

Centene values diversity of thought, and we aim to cultivate an inclusive, respectful workplace where everyone feels empowered to lead with authenticity and vulnerability. To that end, the Company is committed to providing equal employment opportunity for all applicants and team members.

Equal Opportunity

All team members will have an equal opportunity in all employment actions, including recruitment, selection, evaluation, promotion, compensation, training, termination, and working conditions within the Company, regardless of protected characteristics. Further, the Company will provide reasonable accommodations for team members with mental or physical disabilities or with temporary physical or mental limitations due to pregnancy, childbirth, or related medical conditions.

Workplace Free from Harassment and Discrimination

The Company will not tolerate unlawful harassment or discrimination by anyone, including People Leaders, co-workers, non-employees (such as contingent workers or independent contractors) or third parties (such as vendors or customers of the Company), nor will it tolerate unlawful harassment or discrimination of customers, members, vendors, or others by a Company team member or non-employee.

Examples of harassment include:

- **Verbal:** Offensive jokes, slurs, epithets, name-calling, ridicule or mockery, insults, or put-downs.
- **Physical:** Assaults, threats, intimidation, an impeding or blocking movement, any unwanted physical contact, interference with normal work or movement, including sexual harassment, which is unwanted conduct of a sexual nature that is inflicted upon a person or compelled using physical force, manipulation, threat, or intimidation.
- **Visual:** Offensive objects, pictures, posters, or cartoons.

Any team member who believes that they have experienced or witnessed harassment, discrimination, or sexual harassment should report it to the Ethics & Compliance or Human Resources Departments. Do not assume the Company already knows about a problematic situation—instead, proactively report all incidents of harassment, discrimination, and sexual harassment.

Centene forbids retaliation against anyone who, in good faith, reports an ethical or compliance concern, reports harassment or discrimination, assists in making a complaint or participates in an investigation. Any team member who believes they have been the victim of unlawful retaliation for making a report or participating in an investigation should immediately report the retaliatory acts to the Ethics & Compliance Helpline (1-800-345-1642) or to Employee Relations by calling Ask HR (1-833-462-7547) or opening a ticket in Request Central.

Workplace Safety

Centene is committed to providing a safe, healthy, and secure work environment for each employee. This includes maintaining an environment free from intimidation and acts or threats of violence or use of weapons, which are prohibited on Company property. Additionally, Centene maintains a drug-free workplace. Possessing, selling, manufacturing, or distributing illegal drugs on any Company property is strictly prohibited.

Working while under the influence of any intoxicating substance is not allowed. The presence of illegal drugs and alcohol in the workplace and the influence of those substances on employees during working hours pose safety and health risks to the user, their co-workers and to the members we serve. Resources such as the Company's Employee Assistance Program are available to employees seeking counseling, rehabilitation and/or support programs related to drugs and/or alcohol.

Any employee who experiences or has knowledge of threatening or violent behavior should report it right away. In an emergency, call 911. Further reports may be made to a People Leader, the Human Resources or Ethics & Compliance Departments, or to the Physical Security team at 1-833-CNC-SAFE or 1-833-262-7233.

Ask a Compliance Officer – Creating and Maintaining an Inclusive, Safe, and Responsible Work Environment:

Q My entire team was gone when I got back from lunch to attend a training on the new billing system launching next month. My team lead told me I was not included because I will be on maternity leave during the system launch. Now, I feel behind the rest of my team. What should I do?

A Report your concern to the Human Resources Department or to the Ethics & Compliance Helpline. Our People Leaders are accountable for offering all team members an equal opportunity in all employment actions, including important training opportunities, regardless of protected characteristics such as pregnancy.

Q My co-worker changed their virtual meeting background to a beach scene where people are wearing minimal clothing and bathing suits as part of a “summer” theme. This is distracting and seems inappropriate. What should I do?

Q Notify your People Leader, the Human Resources Department, or report via the Ethics & Compliance Helpline. All team members should be mindful of the Company’s expectation to treat one another with respect and professionalism. Offensive pictures, depending on the surrounding circumstances, may be considered a form of harassment.

Q I often review email or work on projects outside of traditional working hours, including late at night after I’ve had a glass or two of wine at dinner. Is it ok for me to complete job-related tasks even after I’ve had a glass of wine?

A No. You should avoid doing any work on behalf of the Company after drinking alcohol, as Company policy prohibits working under the influence of illegal drugs or alcohol. Even if you don’t feel affected, it can be difficult to determine whether your judgment and decision-making ability has been impaired. If you anticipate needing to work in the evening, you should abstain from using intoxicating substances.

Supporting Policies

- Equal Employment Opportunity and Affirmative Action (CC.HUMR.02)
- Inclusive & Responsible Workplace (Anti-Harassment & Non-Discrimination) (CC.HUMR.14)
- Job Postings (CC.HUMR.12)
- Workplace Violence Prevention (CC.HUMR.04)
- Drug and Alcohol Free Workplace (CC.HUMR.18)
- Workstation Etiquette & Safety Standards (CC.FACL.08)

Key Laws Impacting Centene's Business

U.S. False Claims Act (FCA):

The FCA imposes civil and criminal penalties on any individual or entity that knowingly keeps an overpayment or submits a false or fraudulent claim for payment of U.S. government funds. The FCA applies to claims by healthcare organizations to Medicaid, Medicare, and other government-sponsored healthcare programs. If found liable under the FCA, the individual or entity may also be excluded or suspended from participating in all federal healthcare programs. Additionally, many states have their own version of the FCA.

The FCA also includes provisions related to "whistleblowers." These provisions allow people who have evidence of fraud to file suit on behalf of the government, and they also protect whistleblowers from retaliation for their lawfully made reports.

Stark Law:

The Stark Law prohibits physicians from referring individuals for specific health services paid by Medicare to other providers in which the physician has a financial relationship or interest. Financial relationships include direct or indirect ownership, investment, or interest in an entity by the referring physician or their family members.

This law often comes up in the context of laboratories or equipment suppliers, where a physician might order lab work or equipment for a patient and recommend they fill the order at a lab or supplier co-owned by the physician. Contact the Special Investigations Unit (SIU) with any questions or concerns.

U.S. Foreign Corrupt Practices Act (FCPA):

The FCPA prohibits giving money or other things of value to a government official with the intention of corruptly influencing the official's actions. A government official may include, for example, an employee at a public hospital, a candidate for political office, or an employee for an entity partially or wholly owned by the government.

To avoid even the perception of inappropriate conduct, any gift and/or entertainment given to or received from a government official or government employee must be pre-reviewed by the Ethics & Compliance Department. Pre-review and approval is required even if local laws or customs allow "facilitation" payments to government officials or if such payments are intended to be made through an intermediary. Penalties for violating the FCPA may be severe and could include civil or criminal action and internal disciplinary action.

Anti-Money Laundering:

Money laundering is a method of attempting to conceal the origins of money gained through illegal activity. Centene's policy is to conduct business only with legitimate customers whose funds come from legitimate commercial activity. Any suspected money laundering or evidence of criminal activity by a customer must be reported to the Ethics & Compliance Department immediately.

Anti-Boycott Laws:

Anti-boycott laws in the U.S. prevent Centene from acting in support of a boycott imposed by a foreign country on a nation that is friendly with the U.S. Refer any boycott issue to the Ethics & Compliance Department.

Anti-Kickback Laws:

Anti-kickback laws impose criminal and civil penalties on individuals and companies who attempt to offer, give, solicit, or accept a kickback. Centene prohibits making or offering kickbacks to anyone for the purpose of obtaining, retaining, or influencing our business. Kickbacks may include items of value (cash or gifts), promising favors, preferential selection or hiring, business courtesies (free products or services), or waivers of expenses. The Ethics & Compliance Department should be consulted prior to offering, giving, soliciting, or receiving anything of value that is not fair market value for services or products received.

Anti-Rebate Laws:

Anti-rebating laws prohibit any person representing Centene from offering current or prospective customers a promise of employment, stock, dividends, contracts, agreements, goods and services, or other in-kind contributions. State and local laws vary, so ensure you contact the Ethics & Compliance or Legal Department for guidance.

Relations with Pharmaceutical Companies

State and federal regulations include guidelines for any compensation received from a drug company. Any direct or indirect compensation creates a potential or an appearance to influence Centene's business decisions regarding drug coverage and utilization decisions. No employees should engage in activity that may be perceived as compensation with a drug company without counsel from the Legal Department.

Ask a Compliance Officer – Key Laws Impacting Centene’s Business:

Q I work in Sales and just had lunch with my college roommate, who is a licensed broker. He asked me to help him grow his business by moving a couple of my small groups to his agency. In return, my former roommate offered to take me on a golf trip as a sign of his appreciation. Is this allowed?

A No. Routing business in exchange for a personal benefit may be interpreted as a violation of Anti-Kickback laws and Company policy, putting yourself and the Company at risk.

Q I recently saw my doctor for my annual checkup. My doctor ordered a blood test and recommended a particular lab, saying that he is a co-owner and has confidence in the service I would receive. Can my doctor do this?

A No. By making this referral, the doctor may be violating the Stark Law, which prohibits physicians from referring individuals to other entities or businesses in which the physician has a financial stake. You should report this situation to the Special Investigations Unit (SIU) for further review.

Q While working at my job in customer service, I received a call from a Medicare member who reviewed her EOB from her last doctor’s visit where she got her flu shot. The member says she didn’t receive several of the services included in the EOB. I reviewed the services in detail with the member, and it does not appear that this is a memory lapse or misunderstanding on her part. What should I do?

A You should contact the SIU and share the documentation and information the member provided. The SIU will review the complaint, along with other data related to the provider’s billing, to determine whether there is reason to suspect unlawful billing activity, including potential violations of the False Claims Act.

Q I volunteer with a Company community outreach program. Our event last weekend was successful in raising money for an after-school program. I’m so appreciative of our mayor’s support in securing the park for our community event that I would like to acknowledge the mayor with a bouquet of flowers. Can I send the mayor this gift?

A No. Even though you may intend the flowers simply as a thoughtful gesture of appreciation, giving gifts to government officials is subject to numerous laws and regulations, and violations can create significant risk. You should discuss with your People Leader or the Ethics & Compliance or Government Relations Departments to find an appropriate way to acknowledge the mayor’s support.

Supporting Policies

- This Code of Conduct (CC.COMP.00)
- Conflict of Interest (CC.COMP.13)
- Fraud, Waste, and Abuse Plan (CC.COMP.16)
- Anti-Money Laundering (CC.COMP.45)
- Rebates (CC.PHARM.FIN.07)

Living our Values Every Day

Centene's Code of Conduct outlines our commitment to integrity, ethical decision-making, and compliance in all business activities. It serves as a guide for each of us to understand and uphold our Values. By adhering to this Code, we create a workplace where everyone can thrive, fostering a culture of integrity and accountability. Let's move forward together, with a shared commitment to doing what's right.

Thank you for your dedication to our Values and for contributing to our success.