Ethics Every Day
Living our values, acting with integrity
About this guide

Making a commitment to ethical behavior every day is easier when you have a trusted resource with information that's quick to access and easy to process. This guide was designed to be that resource, with explanations of some of Humana's guidelines and references to the general policies housed on Humana's intranet.

Who it’s for

• The Humana Board of Directors
• Humana associates
• Employees of Humana or any of its affiliates or subsidiaries, including:
  – Associates of newly acquired Humana companies
    If you’re new to the Humana family, and your company has not yet transitioned to Humana’s payroll or benefits, you may not have access to Humana’s intranet or HR4U. In some cases, the policies of acquired companies may differ from Humana’s policies and procedures. If there are inconsistencies between a Humana policy and the policy of an acquired company, associates from the acquired company will be notified regarding which policy to follow.
  – Humana Government Business associates
    This guide applies to Humana Government Business associates unless otherwise noted. You can find a comprehensive list of policies and procedures on the Humana Government Business SharePoint homepage.

Terms and definitions

Keep the following terms and definitions in mind as you read through this guide:

• Associate – an employee of Humana.
• HR4U – a resource for Humana associates to obtain guidance from Human Resources.
• Humana (or “the company”) – Humana Inc. and its subsidiaries and affiliates.
• Customer – prospective members, members, clients, patients, policyholders and anyone else to whom we offer products or services.
• Business partner (also referred to as third party) – any non-associate contracted, directly or indirectly, to perform a business function or provide a service for or on our behalf. These may also be referred to as first tier, downstream and related entities (FDRs). Some examples of business partners are healthcare providers, pharmacies, sales agents, sales agencies, vendors, suppliers, contractors and delegates.

Navigation and use

This guide can be printed or used electronically.

Using this guide electronically. The features are interactive:

• Next and Back buttons – page through the guide by scrolling or using the Next and Back buttons at the bottom of each spread.
• Hyperlinks – click any hyperlinked word/phrase to access additional information.

The Bottom Line

Look for this Bottom Line icon throughout this guide for quick reminders to help you stay on track ethically and legally.
Dear Associates,

As you know, our dream is to help people achieve lifelong well-being. Part of realizing that dream is a steadfast commitment to act with integrity and achieve the highest ethical standards, something we have been doing for more than 50 years now. The values we share, along with a set of clear ethical principles, help us make good decisions every day.

It takes all of us working together, living our values, taking ownership of our actions and following the state and federal laws that govern our industry to create that perfect experience. To help you understand how you can resolve concerns in any situation, we offer you this book, Ethics Every Day. By taking these guidelines to heart and adopting an “I am the key to integrity” perspective, we can all be successful. It’s true for you, for all of our associates and for us as leaders. In fact, our leaders are not only responsible for their own conduct, they’re also responsible for fostering a culture of ethical behavior.

The contents of this book will guide your actions and decisions, but other resources are also available to provide support. Our Corporate Compliance Program can help you with troubling or confusing matters, or you can reach out to your leader, another leader outside of your team, our HR office (1-888-431-4748 or HR4U@humana.com), or our Ethics Help Line (1-877-5-THE-KEY or Ethicshelpline.com). The Ethics Help Line is staffed by independent, third-party advisers who offer a confidential and anonymous way to report suspected violations, get answers to questions about specific situations and get the peace of mind you need.

With all of us working every day to be the key to Humana’s integrity, we can deliver that perfect experience. When we do the right thing in the right way for the right reasons, we thrive together.
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Key to integrity

With a strong team behind us and great resources at our fingertips, each one of us is the key to keeping Humana an organization of integrity.

Follow the links below to learn more.

I am the key to integrity
I know what to do
I have help
I am safe from retaliation
I share our values
We stay informed and understand the consequences of our actions
We expect our leaders to set the example
Our compliance program

Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)
✉️ Ethicshelpline.com
✉️ ethics@humana.com
By being transparent and acting with positive intentions, you help us **thrive together.**

I am the key to **integrity**

With a strong team behind us and great resources at our fingertips, each one of us is the key to keeping Humana an organization of integrity.

**PICTURE THIS**
You are on the phone with a caller who is requesting personal information for an individual. You want to provide a “perfect experience” for the caller; however, the caller’s name is not listed on the individual’s record as authorized to receive the information. There is a little voice inside you reminding you of the importance of information protection. You ask the caller if the person the information pertains to is available to give permission for you to provide the information, and if the person is able to come to the phone and provide the necessary authorization for this specific call. You also refer to the Privacy—Disclosure of Information policy for guidance.

By listening to that little voice of reason and maintaining an awareness of the importance of safeguarding confidential information, you have promoted a perfect experience for our valued customer!
I know what to do

The guidelines in this book, along with Humana’s policies and resources, help me understand and follow the rules.

Humana policies and resources and the Ethics Every Day guide are available to everyone at Humana. From common sense tips to a common set of principles, you have the help you need to maintain integrity.

Keep this in mind

No matter what the situation.

• Remember the ripple effect—your actions have an impact on everyone around you.
• Don’t forget it’s OK to ask—if something doesn’t feel right, talk to someone about it.

Ethical principles

Four powerful principles steer us away from mistakes we never intended to make.

• **Honesty and respect to all:** Act fairly and honestly with those who are affected by your actions. Respect and value those you serve by treating them the way you and they would want to be treated.

• **Compliance with laws and focus on quality:** Comply not only with the letter of all applicable laws and regulations, but also with the spirit of the law, regulation or regulatory guidance. Act in such a manner that the full disclosure of all facts related to any activity would reflect favorably upon the company or you. Ensure everything is done right the first time and every time.

• **Responsibility for actions:** Adhere to the highest ethical standards of conduct in all business activities and act in a manner that enhances Humana’s standing as a corporate citizen and ethical competitor within the business community. Pursue no business opportunity that requires violation of these principles. Communicate openly, place customers’ needs first and act appropriately, according to Humana’s values.

• **Responsibility for reporting violations:** All of us are responsible for reporting suspected ethical or compliance violations and issues. Humana promotes relationships based on mutual trust and respect and provides an environment in which associates can question a company practice without fear of adverse consequences.

Ethical violations spelled out

Ethical violations include, but are not limited to violations of laws or policies; dishonest or unethical behavior; conflicts of interest; fraud, waste or abuse; questionable accounting and internal controls; criminal misconduct or any suspicious activity.
Questions to ask yourself
If you’re confronted with a situation that you’re unsure how to handle, use these questions to guide your actions:
• Am I following approved company practices?
• Am I causing harm to someone?
• Can I defend my actions to my leader, other associates and the public?
• Am I appropriately protecting information about the company from disclosure to external or internal parties?
• Am I protecting the information of our customers, members, patients, clients, associates and shareholders?
• Am I living up to my personal standard of behavior?
• Will my actions create a conflict of interest or give the appearance of being illegal or unethical?
• Will my actions bring discredit, scrutiny or adverse consequences to any associate or the company if disclosed to the public?

Phrases you hear or read that may signal a potential problem
• “It’s just between you and me …”
• “Well, maybe just this once …”
• “Nobody will ever know.”
• “It doesn’t matter how it gets done as long as it gets done.”
• “Everyone does it.”
• “What’s in it for me?”
• “Don’t contact HR4U or the Ethics Help Line.”
• “Remember, we didn’t have this conversation.”

I have help
From my manager and HR4U, to the Compliance Department and the Ethics Help Line (1-877-5-THE-KEY), I have the support I need when I encounter sticky situations.

An abundance of resources makes me feel comfortable speaking up
Sometimes it’s hard to report concerns or admit you don’t know something. That’s why we make it easy for you to be heard. If you suspect an ethical violation of any sort—whether it’s a Humana policy, a law or even just questionable conduct, you are obligated to report it. Choose the option you feel most comfortable using.

Resources for raising issues, asking questions and reporting suspected violations
• Leader: Ask your leader for advice
• Other leadership: Speak to the next level of leadership
• HR department: Report concerns to HR4U at 1-888-431-4748 or HR4U@humana.com
• Humana’s Ethics Office: Contact via email at ethics@humana.com
• Ethics Help Line: Call 1-877-5-THE-KEY (1-877-584-3539) or visit Ethicshelpline.com
  - Available 24 hours a day, seven days a week
  - Calls are confidential and can be made anonymously
  - Calls are not traced or otherwise identified
  - Staffed by trained, external non-Humana representatives
  - Your report is documented and forwarded to Humana’s Ethics Office for review and determination of action
  - Calls are referred to the appropriate internal departments for investigation

• Special Investigations Referral: Report suspected incidents of fraud, waste and abuse (as defined on Page 55) to 1-800-614-4126 or siureferrals@humana.com or the Ethics Help Line

• Humana Safety and Security Incident Reporting: Complete an incident report at go/reporting or call the 24/7 Humana Fusion Center at 1-800-992-8566 or 502-476-4444

Ethics Help Line
If you feel uncomfortable talking to your leader or other leadership, call the confidential and anonymous Ethics Help Line.

I am safe from retaliation
When I suspect a violation, I know I will not get in trouble for speaking up.
Humana strictly prohibits intimidation and/or retaliation against any associate who, in good faith, reports a suspected or detected violation of ethical standards, Humana policies or applicable laws, rules or regulations or who participates in the investigation of a suspected or detected violation. If you suspect that retaliation is occurring, or has occurred, you should contact the Ethics Help Line.

Investigation of suspected violations
Humana promptly investigates any reported or suspected violations of Humana policies and procedures or any violations of requirements and processes outlined in this Ethics Every Day guide. The confidentiality of the reporter and the reported issue is maintained to the greatest extent possible during investigation/resolution. You’re expected to cooperate fully in any investigation of an alleged violation. If you want to remain anonymous, please provide enough information in your initial report to allow Humana to investigate the issue.
Violations involving fraud, conflicts of interest, bribery or gratuities related to a Humana Government Business (HGB) contract require immediate reporting to the awarding agency and the Office of the Inspector General. For more information, contact the HGB Compliance Official at HGBCompliance@humana.com.
I share our values

My commitment to our values inspires me to do the right thing in the right way for the right reasons. Inspire health, Rethink routine, Cultivate uniqueness, Thrive together, Pioneer simplicity.

**INSPIRE HEALTH**
Care for the whole person—emotionally, physically and spiritually, building inspired communities where health and well-being prosper.

**RETHINK ROUTINE**
Work and learn together, transforming the norm to strengthen operational excellence and outcomes.

**CULTIVATE UNIQUENESS**
Appreciate individual uniqueness, creating an environment where everyone can fully be themselves, reflecting all of us and the communities we serve.

**THRIVE TOGETHER**
Collaborate openly, building positive relationships to achieve strong, sustainable results for us and the people we serve.

**PIONEER SIMPLICITY**
Take personal accountability, working together to create simple, personalized, quality experiences.

We stay informed and understand the consequences of our actions

Times change, and so do the rules that guide our company and industry. That’s why it is our responsibility to stay informed about changes made to Humana policies, laws, regulations and the contents of this Ethics Every Day guide.

**Discipline for violations**
Violation of Humana policies and procedures or anything contained in this Ethics Every Day guide could compromise Humana’s integrity and reputation, cause Humana to be subject to criminal and monetary penalties and may result in disciplinary action for the associate or associates involved, up to and including termination of employment.
Examples of conduct that may result in disciplinary action include but are not limited to:

- Authorizing or participating in actions that violate Humana policies or any of the guidelines specified in this Ethics Every Day guide
- Failing or refusing to report a suspected violation of Humana policies or any of the guidelines specified in this Ethics Every Day guide
- Refusing to cooperate in an investigation of an alleged violation of Humana policies or any of the guidelines specified in this Ethics Every Day guide
- Failing as a leader to detect or report a suspected or actual violation of Humana policies or any of the guidelines specified in this Ethics Every Day guide, if such failure reflects inadequate leadership or lack of oversight
- Retaliating against an individual for reporting or participating in the investigation of a violation or suspected violation of Humana policies or any of the guidelines specified in this Ethics Every Day guide

We expect our leaders to set the example

If you are in a leadership position, you are expected to model ethical behavior and foster a compliant and ethical culture within your organization. This culture must encourage all associates in the organization to communicate concerns when they arise.

You set the example for those you work with. Here are some things to keep in mind.

- You are responsible for understanding and communicating the principles in this document. Make sure you, your associates and contractors have a working understanding of the laws, rules, regulations and Humana policies applicable to your area.
- Never sacrifice ethical or compliant behavior to pursue business objectives.
- Provide your associates and the contractors you oversee with sufficient information to comply with laws, rules, regulations and guidelines.
- Serve as a resource to resolve ethical and/or compliance dilemmas or help associates get connected to the help they need.
- Report all ethical and/or compliance issues that come to your attention, to the Ethics Office, even if you believe the issue has been resolved.

All officers, members of the Board of Directors, associates and business partners (including contracted sales agents or agencies) are required to report information. In coordination with the Law Department and Enterprise Risk and Compliance, they should assist in any investigation by any regulatory or law enforcement agency, elected officials or others responsible for such matters. These matters include bank or securities fraud, any fraud against shareholders or questionable accounting or internal controls, as well as violations of principles set forth in this document.

Waivers

The Board of Directors will consider whether any waiver is needed or conflict of interest exists involving members of the Board of Directors or an executive officer and recommend appropriate action. A waiver is the approval of an exception to the provisions of this Ethics Every Day guide or Humana policies. Such waivers will be disclosed promptly on the Humana website at Humana.com.
Our compliance program

We have a dedicated Compliance team to support and guide us.

**Our Chief Compliance Officer and Corporate Compliance Program**

Humana's Chief Compliance Officer oversees our Corporate Compliance Program. Supported by our executive management team, this program's goal is to provide our associates with the support they need to maintain integrity at Humana. The Corporate Compliance Program includes a Corporate Compliance Plan and the Ethics Help Line. We evaluate the effectiveness of the Corporate Compliance Program annually and make modifications as needed.

For more information about compliance at Humana, visit the Enterprise Risk and Compliance SharePoint site. The Corporate Compliance Plan can be found in Policy Source. Humana's Chief Compliance Officer can be contacted at compliance@humana.com by any associate or external party with suggestions or comments on maintaining ethical behavior or identifying and preventing fraudulent or criminal misconduct.

For Humana Government Business, the Ethics and Compliance Program is overseen by the Humana Government Business Compliance Official and the Humana Government Business Contract Management Department. Associates can email them at HGBCompliance@humana.com with any issues related to an HGB contract.
Conflicts of interest

How your business decisions and personal connections impact Humana.

Follow the links below to learn more.

Your decisions impact Humana
Disclosing potential conflicts
Outside employment and activities
Relationships with other associates and business partners
Business affiliations and financial investments and opportunities
Communications with the media, financial analysts and other outside persons/entities
Political contributions and activities
Lobbying
Community involvement and board memberships
Participation in professional societies and vendor seminars

Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)
📧 Ethicshelpline.com
✉️ ethics@humana.com
Every day, we make choices that impact Humana—who we hire, what we say, what organizations we support and more. In this section, we'll take a look at situations that are, or could become, conflicts of interest—those business decisions and actions that could put Humana in an awkward situation, interfere with your ability to do your job, jeopardize an existing or prospective Humana contract or even break the law.

PICTURE THIS
A leader in your department has an open position, and your cousin wants to apply. In fact, he asks if you can “move his résumé to the top of the pile.” He’s qualified, so no harm in that, right?

Sorry—you can’t give him any preferential treatment. If you think he may be a good candidate for the position, forward his résumé to the hiring leader, disclose the familial relationship and don’t participate in the hiring decision. Keep reading to learn more about how to handle relationships, outside employment, investments and more at Humana.
Disclosing potential conflicts

Let your leader know about the potential conflict and complete a Conflict of Interest Information Disclosure and Agreement (COI) form in any of the following situations:

• You have a relative or domestic partner who works for Humana
• You or any of your relatives or domestic partner receive compensation of any kind from, or hold a financial interest greater than one percent in any entity with which Humana has a competitive relationship or business relationship
• You, your domestic partner or any of your relatives are employed by or receive direct or indirect compensation for goods or services from any entity with which Humana has a competitive or business relationship or which is currently soliciting a business relationship with Humana
• You are employed by or receive any direct or indirect compensation for goods or services from any entity other than Humana
• You are involved or engaged in research or a research study, or hold an interest that may impair or create the appearance of impairing your ability to make a decision that is in the best interests of Humana’s research program
• You engage in activities that compete with any of Humana’s lines of business, or invest in or receive compensation from, current or prospective Humana business partners, suppliers or companies with which Humana is contemplating a transaction—especially investments in or compensation from companies that you have influence over through recommendations or decisions about purchasing their products or services

The Bottom Line

Inform your leader of any questionable activity, interest or relationship as soon as you become aware of it, and be sure to update your COI form as needed.

All associates are required to complete a COI form when they’re hired, annually during Ethics & Compliance Training, when a new potential conflict arises or if a previously disclosed situation becomes inaccurate or changes. Completing the form does not remove the potential conflict of interest.

This form asks you to disclose any activity, interest or relationship that may:

• Compete with any of Humana’s lines of business
• Involve providing services to a competitor, vendor or other person or entity with which Humana has a business relationship
• Interfere with the performance of your work duties
• Constitute a conflict of interest with Humana

What if a potential conflict of interest arises after I’ve been hired?

If a potential conflict of interest develops after you’ve been hired, disclose it to your leader and complete a new COI form as soon as you become aware of it. The Conflict of Interest Review Committee then reviews your disclosure to determine whether an actual conflict of interest exists and, if so, how to eliminate or manage the conflict.
What if the conflict I disclosed changes?

If the conflict you disclosed becomes inaccurate or changes in some way, complete and submit a new form immediately. All Humana associates are expected to do this on an ongoing basis.

The Bottom Line

Keep any outside work separate from Humana work, and don’t let it interfere with your role at Humana. And remember that Humana computer systems, stationery and even your title are meant for Humana business only and should not be used for work outside of Humana. Keep Humana’s proprietary information confidential to avoid creating a competitive disadvantage for the company.

Outside employment and activities

Before accepting a job outside of Humana, please keep the following in mind:

Dedication matters

If your outside employment or activities impair your commitment to your role at Humana, this could present a conflict of interest. Before accepting any position outside of Humana, let your leader know you are considering outside employment and submit a COI form.

Separate your activities

- Ensure that any outside activity is kept completely separate from your Humana work. Doing outside work on Humana time or using any Humana resources, including computer systems, telephone systems or personnel is unacceptable and may lead to disciplinary action.
- Refrain from providing services to any business that competes with Humana or with which Humana has a business relationship unless such service has been disclosed on the COI form and approved by Humana.
- Do not, under any circumstances, act as an industry subject matter expert in exchange for any type of consulting fee or charitable donation made in your name.
- Do not question or survey other Humana associates or contingent workers about their personal or business-related opinions, attitudes or beliefs, for educational research purposes or for any other purpose external to Humana. Do not use Humana member data or other Humana proprietary information for educational research purposes. Doing so can create legal contractual issues with the universities, privacy issues, lost work time, lack of oversight, and concerns from associates. Also, you may not complete practicums, on-the-job training or shadowing at any Humana facility unless through a Humana-sponsored program.

What it might look like for you

You operate a small business out of your home and want to use your Humana-issued laptop to communicate with customers and send invoices.

What to do

Any outside work should not be performed using Humana resources or on company time. Use your own personal computer and wait to perform the work outside of your Humana work hours.
Relationships with other associates and business partners

Playing favorites—even the appearance of it—is unfair and doesn’t support our value of thriving together.

No associate should supervise or be supervised by—either directly or indirectly—a relative, household member or other person with whom the associate has a family, personal or romantic relationship that could be perceived as influencing the leader’s judgment in the course of conducting business. Also, no associate can employ anyone they supervise or anyone they are supervised by, either directly or indirectly, to perform non-Humana work.

No associate is permitted to process enrollment data, claims or correspondence for themselves, family members or friends. If you receive a request to do so, contact your leader, HR4U or the Ethics Office.

Who counts as a relative?

Relatives are considered to be:

• By blood—parent, child, grandparent, grandchild, brother, sister, half-brother or half-sister
• By marriage—husband, wife, stepparent, stepchild, stepbrother, stepsister, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law or daughter-in-law
• By any other relationship—any family member of the associate or the associate’s spouse

If someone I’m related to, or am involved in a personal or romantic relationship with, moves into my department, what do I do?

When marriage, a close personal or romantic relationship, transfer or other circumstances bring you into a situation in which a potential for conflict exists, let your leader know about the relationship and submit a COI form. Our Compliance team will then work with Human Resources to see if the reporting relationship needs to change.

What if my relative works for a business partner, provider, broker or competitor?

It’s imperative that you share with your leader the name of any relative who engages in competing activities or receives compensation from a competitor, business partner, provider or supplier of services, and disclose the relationship on a COI form.

A close personal or romantic relationship with an individual you also conduct business with is not acceptable, whether that person works inside or outside of Humana. When circumstances bring you into such a situation, be sure to inform your leader of the relationship immediately, and disclose the relationship on the COI form.
What it might look like for you
You're on the interviewing committee for a particular role. Your sister has applied, and the committee wants to bring her in for an interview.

What to do
Excuse yourself from the interview decision-making process, and inform the committee members of the familial relationship. It would be tempting to show favoritism to a family member being considered for a position you have influence over. Even if you can remain objective during the process, the relationship could cause your judgment to be perceived otherwise.

Business affiliations and financial investments and opportunities
Business affiliations and financial investments (stock, options to buy stock or other ownership interest in an entity) can be a particularly tricky area and can pose significant conflicts of interest. Here are some guidelines:
• We strongly discourage investing in Humana competitors.
• You should stay clear of investments in, or receiving compensation from, current or prospective Humana business partners, suppliers or companies with which Humana is contemplating a transaction—especially investments in, or compensation from, companies that you have influence over through recommendations or decisions about purchasing their products or services.
• It is entirely off limits to directly or indirectly use or otherwise acquire rights to any property or materials—if you believe Humana may also be interested in pursuing it.
• You must notify your leader and submit a COI form, if you plan to pursue any business opportunity that you become aware of through your position with Humana.

Communications with the media, financial analysts and other outside persons/entities
It's possible that persons outside Humana—members of the media, financial analysts and others—may contact you for comment on a particular story or event, whether it involves Humana directly or our industry in general. Here's what to do if that happens:

Inquiries from the media
If you receive a call or request from the news media while working at Humana (even if it's not related to Humana), don't engage in conversation. Instead, immediately direct the call to the Corporate Communications department so it can be addressed by Humana's designated spokesperson. All public statements or acts must be carefully thought out and personal views kept separate from corporate views.

Inquiries from financial analysts
Inquiries from financial analysts (including personal financial planners) and stockholders about Humana performance or trading activity in Humana's stock must likewise be referred to Humana's Investor Relations department.
Refrain from acting as an expert

No associate should act as an industry subject matter expert in exchange for any type of consulting fee or charitable donation. All presentations to external audiences including formal presentations, panel participations and consultative conference calls with external parties are to be submitted to the Speaker Review Board in advance of any commitment on the part of the associate—regardless of the associate’s level within the organization or the size of the audience. The Speaker Review Board is a cross-functional team that reviews and approves all speaking engagements whether written or oral.

All presentations (formal or informal) that may include matters of public policy (including healthcare reform) should also be sent to Corporate Affairs for review and approval. All requests for completion of industry surveys should be routed to the Speaker Review Board for appropriate disposition.

Speaker Review Board

Associates are often presented with opportunities to share their knowledge and experiences with external audiences.

The Speaker Review Board (SpeakerReviewBoard@Humana.com) is a cross-functional team that reviews all speaking engagements whether written or oral.

Associates should submit all potential engagements for review prior to commitment or delivery to an external audience. This includes:
• Formal presentations
• Panel participation
• Interviews
• Podcast participation

Stipends, fees, grants, honorariums or other payments from professional or other groups should be politely declined. If you believe an exception is warranted, contact the Ethics Office.

Expressing personal views

Don’t use Humana computer systems, stationery or titles in communications when expressing personal views on political or controversial matters, or for fundraising of any kind other than Humana-approved charitable or political activities. Clearly state that any opinions you express are your own, and not those of Humana.

Refer to the Solicitation and Distribution policy for guidance.

Political contributions and activities

Humana is proud to operate in a country where your right to participate in the political process is safely protected. All associates are welcome to make personal political contributions or communicate personal beliefs to elected officials; however, as outlined in Humana’s Political Participation, Lobbying and Contributions Policy, it’s not okay to give Humana’s views on issues of public policy without authorization. Here’s more to guide you:

Political contributions

Federal law and Humana policy prohibit associates from being reimbursed for their personal political contributions. Personal compensation won’t be altered in any way, under any circumstances, to reflect such contributions.
Expressing political views

It’s not only an uncomfortable situation, but also a violation of Humana policy for anyone at Humana to pressure or coerce another associate into expressing a certain political view or contributing to a political action committee, political party, candidate or charitable organization. However, it is permissible for Humana to request contributions to the Humana Political Action Committee (PAC) on a strictly voluntary basis from associates who are eligible under law to receive such requests.

Running for office

No one may serve in any non-military legislative, executive or judicial office, whether national, federal, state, regional, provincial, municipal or local, while employed by Humana unless written approval is received from the Chief Administrative Officer and the Chief Corporate Affairs Officer.

Humana associates may seek such offices, provided they make clear that their political activities are not on the Company’s behalf, and do not use work hours, coercive measures or Company resources (e.g., facilities, staff, telephones, email accounts, computers, copy machines, supplies, letterhead, logos) to further their personal political activities.

Upon assuming any non-military national, federal, state, regional, provincial, municipal or local office, however, associates must resign their employment from Humana unless written approval is received from the Chief Administrative Officer and the Chief Corporate Affairs Officer.

Humana associates may only serve in any national, federal, state, regional, provincial, municipal or local office on the approval of the Chief Administrative Officer and the Chief Corporate Affairs Officer.

Does Humana ever take positions on political matters?

As a responsible corporate citizen, Humana occasionally speaks out on issues of importance to the company. The Executive Management Team, in conjunction with Corporate Affairs, is responsible for developing Humana’s positions on relevant legislative and regulatory issues.

As permitted by law, Humana uses corporate funds to administer a political action committee. The Humana PAC is formed and operated by Corporate Affairs staff, the PAC Board and PAC members. Together, they direct contributions to candidates for federal and state elected offices. Associates’ contributions to the PAC are strictly voluntary.

The PAC itself does not distribute company funds to candidates. The Humana PAC Board of Directors reviews and oversees the company’s involvement in political activities and the operation of the PAC.

Am I allowed to speak or donate on Humana’s behalf?

Unless Humana has specifically asked you to represent the company before public officials or candidates, the general answer is no. Be sure you clearly label any personal communication position on public issues as a personal communication. Refer anyone who asks you to supply Humana’s views on a matter of public policy to the Corporate Affairs department.
Thinking about making a donation? Contribute on your own behalf, not Humana’s. Additionally, we don’t allow associates to use the company’s name, funds, staff, property or services for the support of political parties or candidates, unless those activities are permitted under the relevant laws and are authorized in advance by Humana’s Corporate Affairs department and the Law Department.

**What it might look like for you**

You want to make a personal contribution to a local candidate running for office.

**What to do**

That’s fine—no conflict of interest exists as long as you do not make any political or campaign contribution on behalf of Humana.

That same local candidate then asks you to make an endorsement for use in her commercials. She wants to use your name, title at Humana and our corporate logo.

**What to do**

Humana associates are not permitted to support political candidates on behalf of Humana unless given permission. Using your title can be construed as a tacit endorsement, not as you the individual, but as Humana the company. Refer anyone who asks you to supply Humana’s views on a matter of public policy to the Corporate Affairs department.

**Lobbying**

Humana Corporate Affairs must pre-approve the Company’s retention of outside lobbyists and any other agencies or consultancies retained to provide advice related to Humana’s interaction with government (e.g. national, federal, state, regional, provincial, municipal, local) officials and regulators or otherwise facilitate interaction with such officials and regulators.

Only associates with written authorization from the Corporate Affairs department and the offices of both the Chief Financial Officer and the Chief Legal Officer can facilitate lobbying activities for Humana. Associates authorized by Humana to make contact with members of legislative bodies and other officials to advocate for Humana are expected to abide by all applicable laws at all times.

Humana associates who hold a public office, whether national, federal, state, regional, provincial, municipal or local, under circumstances that are authorized by the Political Participation, Lobbying and Contributions Policy, may not engage in any act that could be reasonably considered lobbying under this policy and such associates may not interact with government officials, regulators or otherwise facilitate interaction with such officials and regulators on behalf of Humana.

To find out the rules around giving gifts to (or receiving gifts from) lobbyists, refer to the Gifts, Favors, Travel and Entertainment section.

The Honest Leadership and Open Government Act of 2007 requires Humana and its lobbyists to disclose their lobbying activities. It also requires us to certify that associates are familiar with gift and travel rules and that Humana and its associates have not knowingly violated those rules.
What do we need to report and when?

Humana and its lobbyists must report, on a semiannual basis, payment or political contributions made by Humana or its lobbyists, or a political committee established or controlled by Humana, to or for:

- Federal candidates, officeholders, leadership PACs and political party committees
- Events to honor or recognize covered legislative or executive branch officials
- Entities named for a covered legislative branch official
- Persons or entities in recognition of a covered legislative branch official
- Entities designated, established, financed, maintained or controlled by covered legislative or executive branch officials
- Meetings, retreats, conferences or other similar events held by, or in the name of, a covered legislative or executive branch official

For additional information, please refer to Humana’s Political Participation, Lobbying and Contributions Policy.

Community involvement and board memberships

Humana strives to be a responsible corporate citizen in the communities in which we operate. We also encourage you to volunteer for and participate in community activities, causes and organizations you’re passionate about. There are a few guidelines to keep in mind as you do so:

**General guidelines**

- Ensure that your outside activities don’t interfere with how you perform your role at Humana
- Clearly state that your personal views and actions are your own and not those of Humana

**Board memberships**

- Board membership for a for-profit organization or an organization with a competitive or business relationship with Humana must be approved by the Conflict of Interest Committee before you accept the position to ensure there’s no conflict of interest
- You must not direct Humana business to any entity on whose board you serve or that pays you compensation based on business results

**What it might look like for you**

You sit on the board of a local private school.

**What to do**

There may be a conflict of interest if Humana provides health insurance to school employees. Disclose the board membership on the COI form.
You’re asked to sit on the board of another healthcare or insurance company.

**What to do**
Disclose the situation immediately on the COI form, before accepting the position. The Conflict of Interest Committee will review the situation to determine if a conflict of interest would exist.

You’re a Humana VP who serves on the board of a non-insurance, non-healthcare organization, and Humana is interested in donating funds to that organization.

**What to do**
Excuse yourself from all conversations and meetings that involve Humana funds or activities directed toward that organization.

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The Bottom Line
When serving on a board or participating in other community activities, make sure you clearly state that your personal views and actions are your own, and not those of Humana, and beware of any activities that may create a conflict with your role at Humana.

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**Participation in professional societies and vendor seminars**

Humana encourages you to participate in role-related professional society meetings, seminars and similar events to broaden your knowledge and grow in your career.

Two things to remember as you take part in such events:

- Any presentations that you expect to give to such groups should be approved in advance by Humana’s Speaker Review Board (SpeakerReviewBoard@humana.com).
- Stipends, fees, grants, honorariums or other payments from professional or other groups should, in general, be politely declined. If you believe an exception is warranted, contact the Ethics Office.

**What it might look like for you**

You’re asked to speak on Humana’s behalf at a local nonprofit organization’s awards luncheon. They offer to pay you for your speech.

**What to do**

First, make sure you’re cleared to speak by contacting the Speaker Review Board. Once approved, accept the speaking engagement, but politely decline the payment.
Gifts, favors, travel and entertainment

Keeping our relationships with others compliant with laws and Humana policies.

Follow the links below to learn more.

Keeping compliant
Gifts
Receiving gifts
Giving gifts
Travel and entertainment

Ethics Help Line:

1-877-5-THE-KEY (1-877-584-3539)
Ethicshelpline.com
ethics@humana.com
Keeping compliant

In our business, gifts, favors, travel and entertainment—whether you’re giving or receiving—could create a conflict of interest. In this section, we’ll draw boundaries around these areas so that the next time you want to thank someone or pick up the check (or someone wants to do the same for you), you’ll know the right thing to do.

PICTURE THIS
You just signed a new network agreement with a large hospital system. You want to thank the business partners you worked with for their time spent on the agreement. So you buy some $10 gift cards to a local coffee shop and distribute them to the business partners who worked with you on the agreement. No problem there, right?

Correct. You can give gifts to business partners as long as they are no more than $50 and not cash equivalent. Keep reading to find out how to stay on the right track when it comes to gifts.

The OGE (Office of Government Ethics; revised as of January 1, 2017 at 5 CFR 2635) considers gift cards to be the equivalent of cash, therefore, associates working under HGB contracts are prohibited from giving/receiving gift cards for any amount.
Gifts

Gifts can come in many forms—some are indirect and may not even be thought of as gifts. Here are some of the most recognized forms:

- Meals
- Favors
- Free or discounted services
- Travel
- Entertainment
- Tickets
- Prizes
- Drawings
- Raffle winnings
- Gratuities
- Monetary awards from business partners

Receiving gifts

Dozens of laws and governing bodies dictate what’s acceptable to receive. Here are some guidelines:

**Receiving from business partners (e.g. suppliers, brokers, agents, delegates and providers) or customers: no more than $50 fair market value**

Avoid accepting any gift worth more than $50 fair market value from anyone connected with your Humana employment. If you get a gift over that amount, or a gift of money or cash equivalent in any amount, you should return it to the giver unless it’s a food basket or other food item, which should be shared with your department. Thank the giver and inform him or her of Humana’s Business Gift Policy. These policies also apply, but are not limited to, prizes, drawings, raffle winnings, gratuities and awards. You should never accept or solicit discounts from business partners or customers on personal purchases or products or services; or accept favorable treatment on loans or other services. You can utilize discounts, loans or other services that are broadly available to Humana associates through a Humana-approved program such as Great Deals.

**Receiving from government: no more than $15 fair market value**

Federal Acquisition Regulation (FAR) requirements do not permit Humana associates to accept gifts from the government or government employees, except:

- Modest items of snacks and refreshments (such as soft drinks, coffee and doughnuts) offered other than as part of a meal if made available to everyone in attendance.
- Promotional or marketing materials (e.g., pens, pencils, note pads and calendars) valued at $15 or less per occurrence (not per item), with an aggregate amount of $50 per year.
- Tokens of appreciation (e.g., command coins or patches—should be nominal/insignificant tokens) with the command’s/unit’s logo valued at $15 or less per occurrence (not per item), with no specified annual limit.
What it might look like for you
A printing company appreciates Humana’s business and enjoys working with you. They offer you 50 percent off a set of birthday party invitations for your family.

What to do
Thank the vendor but decline the offer. Any discount extended by a vendor needs to be made available to all Humana associates.

Gifts of money or cash equivalent are never permissible.
Gift cards can be given only in accordance with the Business Gift Policy in the Associate Support Center.

The Bottom Line
Avoid accepting any gift worth more than $50 fair market value from anyone.

Giving gifts
There are many laws that govern what we can give to others. Here are some guidelines:

Giving to business partners (e.g., suppliers, brokers, agents, delegates and providers): no more than $50 fair market value
You should not give gifts valued at more than $50 fair market value. Requests to provide gifts that do not qualify as entertainment and that have a fair market value of more than $50 per person must be reviewed by the Ethics Office. If the gift exceeds $50 and qualifies as business entertainment, a request in writing must be made to and approved by your senior leader. Senior leader is defined as a segment vice president or above, or his/her designee.

If you receive approval to give tickets to an event with a fair market value greater than $50, the recipient needs to be accompanied to the event by a Humana associate.

Giving to government employees* from Humana associates and lobbyists: Humana associates and lobbyists are forbidden to give to or be reimbursed for giving anything of value to government employees
Note that even a cup of coffee can violate federal gift rules unless provided as part of an organized event. Exceptions include certain limited circumstances, such as when Humana hosts a reception that involves providing nominal food and beverages offered other than as part of a meal.

Health plan giving to Medicare/Medicaid beneficiaries: no more than $15 fair market value for one item and no more than $75 fair market value for multiple items in a year
• The Centers for Medicare and Medicaid Services (CMS) guidelines state that a Medicare Advantage Organization or Prescription Drug Plan Sponsor (e.g., Humana) or its representative can give prospective or current enrollees items or services as long as those gifts are of nominal value (worth no more than $15, or less, based on the fair market value of the item) and provided regardless of enrollment and without discrimination. Items cannot be considered a
health benefit (e.g., a free checkup) and cannot be tied directly or indirectly to the provision of any other covered item or service. The items or services must not exceed an aggregate (combined) total fair market value of $75 in a year, per enrollee. The gift(s) cannot be cash, monetary rebates, cash equivalents or redeemable for cash. Refer to the CMS Medicare Marketing Guidelines.

- State Medicaid agencies may have stricter requirements related to Medicaid beneficiaries. If the state does not specify gift requirements, Humana applies the guidelines (in the first bullet above) to Medicaid beneficiaries. For information about state requirements, contact the Law Department or Compliance at compliance@humana.com.
- Regardless of the types of insurance plans they sell, agents must adhere to all applicable state and/or federal laws and company policies.

**Healthcare providers giving to Medicare/Medicaid beneficiaries:**

no more than $15 fair market value for one item and no more than $75 fair market value for multiple items in a year

- A healthcare provider, like Partners in Primary Care or Humana Pharmacy, may not offer or provide items or services to beneficiaries unless the item or service has no retail value or the retail value does not exceed $15 fair market value for one item or service, and no more than $75 worth of items or services in a given year, as explained in the **Provider Beneficiary Anti-Inducement Policy**.
- State Medicaid agencies may have stricter requirements related to Medicaid beneficiaries.

**Anyone giving to commercial customers: contact Compliance**

Many states have laws limiting or prohibiting the amount of gifts or promotional items that health plans give away to commercial or individual customers or prospects that are looking to purchase commercial or individual products. For more information about state requirements, contact Compliance at compliance@humana.com.

**Giving to federal, state, local government employees***

We can’t provide or pay for meals, travel, lodging, expenses or entertainment for government employees. Only modest snacks and refreshments are allowed if provided to a group for an organized event. Government employees must pay their fair share whenever they participate in a joint endeavor with Humana.

State and local governments may have more flexible rules regulating the acceptance of business courtesies, such as meals and refreshments which are specified in the FAR requirements below. For information about state requirements, contact Compliance at compliance@humana.com.

**Federal Acquisition Regulation (FAR)**

Federal Acquisition Regulation (FAR) requirements do not permit Humana associates to give gifts to government employees, except:

- Modest items of snacks and refreshments (such as soft drinks, coffee and doughnuts) offered other than as part of a meal if made available to everyone in attendance at an organized event.
- Promotional or marketing materials (e.g., pens, pencils, note pads, calendars) valued at $15 or less, per occurrence (not per item), with an aggregate amount of $50 per year.
*When we say “government employees” we mean anyone working for any government agency, such as*

• Centers for Medicare & Medicaid Services (CMS)
• Departments of Insurance or Health
• State and federal exchanges (including stand-alone dental plans)
• Anyone contracting directly with a government agency or performing work on behalf of that government agency such as market conduct examiners
• Department of Defense (DoD)
• Department of Veterans Affairs (VA)

**Travel and entertainment**

You represent the entire Humana family when you travel or entertain for work purposes, so it’s critical that you use good judgment and make sound decisions. Keep these points in mind:

**Travel reimbursement**

Humana will reimburse associates for all reasonable and necessary business expenses incurred while traveling for authorized company business purposes. During approved business travel, you won’t be reimbursed for personal or non-business related expenses incurred, such as:

• Those related to any adult entertainment establishment
• Any establishment not appropriate for business purposes
• Any location that is likely to be offensive to a person attending in connection with authorized company business purposes

**Vendor-financed travel**

Generally, trips should not be financed by anyone you’re doing business (or considering doing business) with.

**Attending events hosted by outside sources**

If you receive an offer from an outside source to attend, speak or present, as a representative of Humana, at an event such as a conference or seminar, and the offer includes funding for travel or expenses that exceed $50 in value, the funding for travel or expenses must be reviewed and approved by the Ethics Office. Contact ethics@humana.com with any questions.

**What it might look like for you**

You just flew in for a meeting, and a vendor arrived at the airport at the same time. You decide it’s convenient for the two of you to share a cab to the hotel. Who pays?

**What to do**

Split the cab fare.

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**What it might look like for you**

You set up a meeting with government personnel. The only time you can meet is during lunch, so you meet at a restaurant. Who pays?

**What to do**

Thank them for meeting with you while also reminding them that you can only cover your portion of the bill.
Health plan marketing practices

Promoting our products and services with integrity.

Follow the links below to learn more.

Thrive together
Health plan sales and marketing
Antitrust laws

Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)
💌 Ethicshelpline.com
✉️ ethics@humana.com
We sell a wide range of products and services to people of all ages. Everyone at Humana—whether your title includes “Sales” or not—represents who we are and what we do. It’s important for all of us to understand what is permissible when marketing our products and services, so we can continue to offer consumer choices in the marketplace.

PICTURE THIS
A friend of yours is a Medicare Advantage (MA) sales agent. You’re considering becoming one, so you ask him how hard it is. He says, “It’s easy. Every year I help my daughter sell wrapping paper to the neighbors for a school fundraiser. I give my card to people answering the door and tell them to call me if they want to explore new plan options. I get a lot of calls and sell quite a bit that way.”

If you think something about this sounds a little off, you’re right—unsolicited, door-to-door marketing of Medicare Advantage plans isn’t allowed. Read on to find out more about maintaining fair marketing practices at Humana.

Marketing our health plans honorably drives an exceptional experience for prospective members—yet another way we can thrive together.
Health plan sales and marketing

When marketing our products and services to prospective or current Humana customers, keep the following in mind:

- You must follow all applicable laws, rules, regulations and Humana policies and procedures.
- Marketing materials must conform to all appropriate laws, regulations and Humana policies. Marketing materials must be approved through the Corporate Marketing Review Process before distribution. This assures that materials are reviewed for accuracy, brand consistency, tone, compliance with laws and regulations and that external regulatory approval is obtained if needed. Refer to the Medicare, Medicaid and Commercial marketing and communication policies found on Policy Source. If you have questions, contact compliance@humana.com.
- Humana associates must accurately represent products, services, benefits and prices when engaging in marketing and sales efforts and should always do so with integrity.

Sales practices

The first interaction a customer usually will have is with a sales representative or a marketing communication. Sales representatives should be sure to follow all applicable state and federal laws and Humana policies. Those selling to Medicare- or Medicaid-eligible individuals must also adhere to regulations set forth by the Centers for Medicare and Medicaid Services (CMS) and, for Medicaid, applicable state agencies.

Medicare and Medicaid marketing

When marketing to prospective or current Medicare or Medicaid beneficiaries, remember:

- Review and follow the guidelines published by CMS and, for Medicaid, follow applicable state agency guidelines.
- Follow Humana’s policies and procedures that interpret CMS and state (as applicable) guidelines.
- Do not discriminate on the basis of health status when selling to or enrolling Medicare or Medicaid beneficiaries. This applies to sales representatives and other associates. Generally, this means no prospective Medicare Advantage or Prescription Drug Plan (PDP) member may be asked questions concerning health status, except in limited circumstances for Medicare Advantage to determine eligibility for a Chronic Care Special Needs Plan or to determine if the prospective member has end-stage renal disease. A Health Risk Assessment may be conducted after enrollment to place the member in an appropriate disease or medical case management program.
- Conduct sales presentations of Humana Medicare and Medicaid plans in settings that are accessible to everyone, regardless of his or her health status or physical ability.
- Medicare Advantage and Prescription Drug Plans are required to enroll all eligible Medicare beneficiaries who elect the plans regardless of age, health status or cost of health services needed, unless otherwise directed by law, rule or regulation, such as in the case of end-stage renal disease.

Also note that you should never encourage disenrollment of Medicare or Medicaid beneficiaries because of the individual’s health status.
**DID YOU KNOW?**

All agents who sell our Medicare Advantage (MA), Medicare Advantage Prescription Drug (MAPD) and/or Prescription Drug Plan (PDP) plans participate in specialized training each year on Medicare, plan rules, benefits and how to compliantly sell our plans. They also have to pass a test with a correct score of at least 85 percent. This applies to employee agents in the field, agents in Direct Marketing Services call centers and all of the contracted agents who sell our plans.

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**I’m on the phone with a prospective Medicare member who keeps referring to her asthma and eczema—am I allowed to require her to tell me how often she goes to the doctor and why before enrolling her or say she’s not eligible because she is not healthy?**

No—asking her questions about health status before enrolling her may give the impression that you would use this information to discriminate against her. You also can’t tell her she’s not eligible for a Medicare Advantage or Prescription Drug Plan based on her health status unless she has end-stage renal disease and does not meet applicable exceptions or the law or regulations permit it. However, if you are selling a Medicare Supplement Plan, you may be able to ask health status questions if the individual is not in a guarantee issue period.

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**The Bottom Line**

No matter what you do, you are the face of Humana when interacting with our customers. It's never acceptable to disregard the guidelines included in this Ethics Every Day guide or the Humana MarketPoint Sales and Marketing Code of Ethics to benefit you or Humana, even if it would result in more sales.

NEVER DISCRIMINATE AGAINST anyone based on health status when enrolling them in a Humana Medicare Advantage or Prescription Drug Plan.

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**Antitrust laws**

Antitrust laws are in place to protect and promote competition on the merits of particular products or services. Thus, these laws protect consumers from market power that was not gained through legitimate competition. Humana is strongly committed to fair competition, and it is the responsibility of all Humana associates to comply with the antitrust laws.

Generally, antitrust law focuses on “collusion” and “exclusion.” For example, the following conduct may give rise to civil or even criminal liability, damages, fines and other serious legal sanctions:

- **AGREEMENTS AND CONSPIRACIES:** Agreements or mutual understandings, usually involving competitors, that unreasonably restrain competition in specific product and geographic markets

- **MONOPOLIZATION:** The process by which a company gains the ability to raise prices above competitive levels or exclude competitors altogether, through predatory or exclusionary conduct, and obtain a high market share

- **EXCLUSIVE CONTRACTS:** Contracts that preclude one party from contracting with another purchaser or supplier or utilizing certain pricing terms may in some circumstances unreasonably restrain trade

- **UNFAIR TRADE PRACTICES:** Certain anti-competitive conduct that lacks a legitimate business justification
Such conduct must be avoided. For example, communications between Humana associates and employees of our competitors should be avoided, unless they involve certain legitimate business transactions (e.g., an acquisition) or lawful trade association activities. You also should avoid communications about financial matters such as provider contracting strategies, reimbursement amounts and methodologies, premiums or specific customers.

Regarding contracting with healthcare providers and other vendors, Humana associates must take care when agreeing to exclusive arrangements. The legality of these arrangements depends on a variety of factors, including the parties’ market shares and whether the arrangement threatens substantial foreclosure of access to a market by competitors. Please contact the Law Department if you have questions about exclusive contracts.

The dominant hospital in a county threatens to cancel its contract with Humana or alter its rate reductions for hospital services unless Humana agrees to contract with the hospital’s radiology group and not with the smaller, local radiology group. If Humana goes along, explaining that it is doing so only at the hospital’s insistence, is there antitrust risk to Humana?

Yes. The agreement could be anticompetitive, and even unwilling participants can be liable for antitrust violations.

The Antitrust laws are complex and can impact Humana associates in a variety of ways. Please review Humana’s official antitrust policy or contact the Law Department with any questions.

Click the links below to learn more

CMS Medicare Marketing Guidelines
Medicare Communications and Marketing Materials
Commercial Marketing Materials, Advertising and Communication
Information protection

Guarding information, maintaining trust

Follow the links below to learn more.

Maintaining trust
Information overview
Accuracy of information
Safeguarding information
Protecting personal information
Humana information
Insider information and securities trading
Creating and retaining business communications
Information protection acceptable use
Reporting of suspected privacy or security violations

Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)
✉️ Ethicshelpline.com
✉️ ethics@humana.com
Maintaining trust

Humana’s most important relationships are those we have with our customers. If we’re going to maintain their trust and loyalty, we need to preserve the integrity of our corporate information and keep confidential material secure. It only takes one person sharing something he or she shouldn’t for that trust to be broken. Each of us—whether we handle member data every day or consider our role to be far from the front lines—has a responsibility to protect that information like it’s our own.

PICTURE THIS
You are working on a case file when a fellow associate stops by to call you into a brief, but urgent, meeting. The associate urges you to drop what you are doing and come quickly. You think twice before leaving your desk because the case file contains personal health information. Instead, you decide to put away and lock up the items you are working on and any other confidential items on your desk.

Good decision—as a Humana associate, you are responsible for protecting the information of our consumers. Keep reading to find out more ways to be a good steward of our consumers’ and the company’s information.
Information overview

What type of information is considered **Humana Internal, Restricted or Confidential**?

Virtually all information about our business and consumers is considered **Internal, Restricted or Confidential**.

**Humana Internal, Restricted or Confidential** information includes but is not limited to Humana methods, processes, techniques, computer software, equipment, research data, clinical and pharmacological data, marketing and sales information, associate data, customer lists, financial data, business plans and all other trade secrets that are in the possession of Humana and that haven’t been published or disclosed to the general public.

**PUBLIC**
Information that is not business sensitive and is available for public release.

**HUMANA INTERNAL**—(BUSINESS USE ONLY)
Information that is generally available to Humana associates, but not for public disclosure, which includes, but is not limited to:
- Business process flows
- Policies and procedures
- Vendor listings
- Vendor contracting terms
- Employer group information

**HUMANA RESTRICTED**—(PROPRIETARY)
Sensitive corporate information intended for use only by named individuals or departments. This includes, but is not limited to:
- Strategic plans
- Trade secrets
- Unreleased financial results
- Computer network designs
- Computer source code
- Salary information

**HUMANA CONFIDENTIAL**—(PROTECTED)
Relates to private personal information protected by either state or federal regulations. This includes, but is not limited to:
- Protected Health Information (PHI)
- Electronic Protected Health Information (ePHI)
- Personally Identifiable Information (PII)
- Personally Identifiable Financial Information (PIFI)
Accuracy of information

We’re committed to providing accurate and truthful information in every transaction. We reinforce this commitment with internal controls and procedures that ensure our reports and records are accurate and reliable, including a system of internal accounting controls designed to maintain the integrity and reliability of our financial reporting to the Securities and Exchange Commission, the Departments of Insurance, the Centers for Medicare & Medicaid Services, and other regulatory agencies. Our internal controls are also designed to detect and prevent illegal activities in compliance with the Foreign Corrupt Practices Act (FCPA).

Humana’s financial reporting system also provides assurance to these regulatory agencies, stockholders, the Board of Directors and leadership that our assets are safeguarded and transactions are executed and recorded properly in accordance with appropriate authorization. All associates, within their areas of responsibility, are expected to adhere to the proper policies and procedures and to maintain the integrity of any report or document we create.

If you know of any reason to question the accuracy of such financial reporting documents, raise the issue with leadership or contact the Ethics Help Line.

Testing the accuracy of financial reports

Humana’s Internal Audit Consulting Group periodically conducts audits to test the reliability and accuracy of financial reports. In addition, regulatory agencies conduct periodic audits or examinations of Humana’s financial and business operations. Leaders are responsible for supporting internal and external audit efforts by:

- Cooperating with audits
- Requiring timely responses and action from leadership on audit reports
- Submitting complete and accurate information in a timely manner
- Keeping the Internal Audit Consulting Group informed of changes to the risk and control profile of the business process

The Bottom Line

It’s everyone’s duty to provide accurate, complete information in every situation. If you feel you’ve been asked to withhold information from auditors, members, co-workers or customers, report it immediately.

Safeguarding information

Because our associates have access to sensitive information (classified as Humana Confidential, Restricted or Internal information), this material must be safeguarded to prevent it from falling into the wrong hands.

Humana Confidential, Restricted or Internal information includes information that’s stored, accessed or transmitted through physical (paper, copier or facsimile), electronic (email, facsimile or data files) or any oral communication that may or may not be recorded. (See Insider information and securities trading in this chapter for information about the protection of material non-public information.) Unauthorized disclosure of, or access to, Humana Confidential, Restricted or Internal information may result in disciplinary action, up to and including termination of employment, and also may result in civil and criminal penalties.
I want to continue working on resolving a member issue when I head out of town. Can I save the member’s information to a personal flash drive or print his or her profile to reference after I leave the office?

No. Humana Restricted or Confidential information, which includes member information, should not be taken off premises unless an approved and documented governance process is in place and utilized. Unapproved/personal flash drives or removable storage of any kind cannot be used with Humana devices. Humana departments with a business need to move Humana Restricted or Confidential information off-site should contact the Privacy Office for guidance when developing and implementing procedures for properly transporting this information. See Humana’s Policy–Secure Data Handling on Policy Source for additional information.

I have a hard time remembering usernames and passwords—can I keep a note in my desk drawer with my sign-in information?

No. It’s against Humana’s Policy–Workforce Identity and Access Management to write down your login credentials as they could easily be found and used to access sensitive information. Instead, use a password you can easily remember (check out the Password Tip Sheet) but do not use the same password you use for your personal computing (e.g., banking, Facebook, email, etc.).

How to protect information at Humana

To prevent inadvertent disclosure of Humana Confidential, Restricted or Internal information, follow these best practices:

• Adopt a “clean desk” habit for Humana Confidential, Restricted or Internal information. Secure all Humana Confidential, Restricted or Internal information, including protected health information (PHI), on white boards, in locked offices, desks or file cabinets when not in use.

• Practice a “clean screen” standard. Lock your workstation when you step away for any period of time, and use the Go Home icon on your desktop at the end of each business day.

• When no longer needed for legal, regulatory or business reasons and the data is not on legal hold or under the applicable record retention period, then physically destroy cardholder data, paper documents and removable storage media containing Humana Confidential, Restricted or Internal information beyond the ability to recover. (A “legal hold” is issued by the Law Department because of a current or reasonably anticipated litigation or other matter that suspends the applicable Humana record retention period.) Locked shredder bins in office areas are designed for both paper and small quantities of plastic media destruction.

• When traveling, make sure laptops and other computing equipment are secure and out of sight when not in use (for example, in the trunk of a car, a locked cabinet/desk or other lockable container). When traveling by air or rail, do not transport laptops, computing equipment, and other Humana Confidential, Restricted or Internal information in checked baggage. A laptop/other equipment/paperwork should not be left in a vehicle overnight, including in the trunk.

• Placing or storing Humana Confidential, Restricted or Internal information on removable storage devices or media is prohibited unless using a Humana-approved device, and then only when a business need can be justified and approved by your leader, a director-level of leadership with your area and the Security Review Committee (SRC). There are other secure means of transferring sensitive information, such as secure file transfer protocol (SFTP).

The Bottom Line
Do not print Humana Internal, Restricted or Confidential information or remove it from Humana premises even to perform work away from Humana, in accordance with the Policy–Workforce Identity and Access Management.

Protecting personal information

Our customers, members, patients and clients trust us to protect their personal privacy. Many associates have access to some amount of non-public personal information or protected health information (both of which are otherwise known as protected information). Any inappropriate or unauthorized disclosure of that information undermines trust in Humana, damages our long-term relationships and places us at legal risk.

Humana’s Privacy Office oversees activities related to the development, implementation, maintenance of and compliance with Humana’s privacy policies and procedures for protected information.

All Humana associates are required to review our privacy policies and standards and their departmental privacy procedures. Humana Government Business associates should review the policies located on the Humana Government Business SharePoint home page.

Here are a few of the critical concepts from Humana’s Privacy Policy and corporate guidelines that help to shape our decision-making:

• Authenticate all inbound and outbound telephone calls before disclosing any protected information. Verify the identity of the person requesting the information and the authority of any person to have access to the information. Refer to Humana’s Guide for Disclosure of Information.

• Obtain consent from a customer prior to releasing his or her protected information to an unauthorized third party. Refer to Humana’s Corporate Consent Guide.

• Execute a Business Associate Agreement (BAA) with the contracted entity if it’s your responsibility to contract with an external entity where protected information is used, stored, disclosed, created or accessed.

• Limit the use and disclosure of protected information to those uses and disclosures outlined in Humana’s Privacy Policy Summary.

• Limit the use and disclosure of protected information to the least amount required to accomplish the intended purpose of the use, disclosure or request.

The Privacy Office website has additional guidance for handling protected information.

The Bottom Line
Every associate who has member information at his or her fingertips is key to Humana’s integrity and the trust of our most prized relationships. Associates must protect this information and make sure it doesn’t get into the wrong hands.
What it might look like for you
You want to work on a work project at home, so you decide to email some member information to your Gmail account.

What to do
Don’t! Forwarding company information via non-Humana approved channels, such as personal webmail, is unsecure and risky. Plus, storing this information on your personal device is not allowed. It’s important to understand that information stays on your PC or device even after you delete it, which means that when you sell or donate that old device, someone else could find member information. Only use a Humana-approved device (like an encrypted disk or encrypted removable flash drive) on your work computer to transport sensitive information.

Humana information
Failure to adequately protect **Humana Confidential, Restricted** or **Internal** information may place Humana at a competitive disadvantage in the marketplace. Because of this risk, you shouldn’t use any **Humana Confidential, Restricted** or **Internal** information for your own benefit or disclose to others during the course of employment (without written consent of Humana) or anytime thereafter, other than what may be required by law or in the ordinary course of Humana’s business. No associate should act as an industry subject matter expert in exchange for any type of consulting fee or charitable donation. All presentations must not contain any Humana information and should be approved in advance by Humana’s Speaker Review Board at SpeakerReviewBoard@humana.com.

**CONFIDENTIALITY AGREEMENT REQUIREMENT**
All associates must acknowledge the requirements in the Confidentiality Agreement when beginning a relationship with Humana, and in certain circumstances, before receiving access to specific confidential information. Thereafter, the Confidentiality Agreement is acknowledged on an annual basis during Ethics & Compliance Training. All associates must strictly adhere to its provisions.

What it might look like for you
You have worked as a MarketPoint sales associate for Humana for several years. Over the course of that time, you sold many Humana Medicare Advantage (MA) and Prescription Drug Plans (PDP). You have now decided to leave Humana as an employee selling Humana exclusively so that you can become an independent agent and can market all plans available in the area. Before your last day at Humana, you think about all the clients you have enrolled into a Humana plan and feel you should have a right to print a report of all the members you enrolled and take this information with you.

What to do
Don’t! Printing a report would be a violation of the Confidentiality Agreement you signed, which extends beyond the end of your employment with Humana. In addition, contacting Humana members about business other than their Humana membership would be considered an unauthorized use of protected information and is a violation of federal privacy laws.

The Bottom Line
Keep Humana information confidential—even after your employment with Humana ends.
Insider information and securities trading

As a publicly traded company, we have a responsibility to provide full and fair public disclosure on a timely basis of any activities that would materially affect the value of Humana’s securities, including common stock, stock held in the Humana Retirement Savings Plan 401(k) or stock options.

In the normal course of business, some associates may have access to information about these activities before it becomes public knowledge. Until it’s released to the public, this knowledge is considered “insider” information and must be kept confidential. This applies to information concerning Humana as well as information related to any other organizations to which associates may have access.

Insider information is considered “material” if there’s a substantial likelihood that you or another reasonable investor would consider the information important in deciding whether or not to buy, sell or hold Humana securities. Specific examples of “material” information generally include:

- Unanticipated changes in annual and quarterly earnings or dividend rates
- Stock splits or dividends
- Stock repurchase activity
- Significant acquisitions or dispositions
- Reorganizations
- Proposed tender offers
- Senior leadership changes

Information about major new products, proposed Medicare payment rates, contract awards, expansion plans or significant litigation or regulatory proceedings also may fall in the category of “material” information. Federal securities laws prohibit trading in securities while aware of this information, and also prohibit releasing this information to anyone—including relatives, friends, colleagues or stockbrokers—until it’s been disclosed publicly and the public has had time to react to it. If you obtain access to non-public, material information about the organization while performing your role, you may not discuss this type of information with anyone outside Humana, including your spouse or other members of your family. Within Humana, you should discuss this information on a strictly “need to know” basis with other associates who require this information to perform their role. These discussions should take place in private, secured areas and shouldn’t happen in common areas or within the hearing distance of others. You may not buy or sell Humana securities, including common stock, stock held in the Humana Retirement Savings Plan 401(k) or stock options or the securities of companies relating to the inside information while aware of such information.

Even if you don’t buy or sell securities based on what you know, discussing the information with others, such as family members, friends, business partners and other outside acquaintances is prohibited until the information is considered to be public. In addition, you may not buy or sell “put” or “call” options or other derivatives on Humana stock, including any financial instrument that is designed to hedge or offset any decrease in the market value of Humana’s stock, nor may you sell Humana stock short. For more information, please refer to Humana’s Policy Regarding Transactions in Company Securities, Inside Information and Confidentiality on Policy Source.
I have Humana stock in my 401(k) portfolio. Can I rebalance or increase/decrease my contribution based on information I know that could impact Humana’s stock?

No—that’s insider information and could get you into a lot of trouble. It’s best to rebalance or increase/decrease your contribution at another time.

Creating and retaining business communications

Creating business communications

Almost all business records and communications—even things you thought were private, like email—could potentially become public in the course of litigation, government investigation or after being obtained by the media. Here are some tips to ensure your communications are professional and appropriate for public view at all times:

• Pay attention to the words and expressions you use when writing notes, documents, internal presentations or emails.

• Be clear, concise, truthful and accurate when creating any information and in representing your role, responsibilities and authority.

• Avoid using exaggeration, colorful language, speculation, legal/risk conclusions and derogatory characterizations of people or their motives.

• Treat electronic messages and other documents stored in a computer as you would paper documents. Business documents in the electronic files of associates are generally subject to disclosure.

Humana expects associates and their internal communications to comply with federal and state laws, rules and regulations. If you have questions about whether a communication activity complies with applicable law, please contact the Law Department or Compliance at compliance@humana.com to review the communication.

Retaining business communications

All customer, business and associate documents and records are retained in accordance with the law and Humana’s Record Retention Program. Pertinent records include, but aren’t limited to, customer, business and associate documents, including paper documents such as letters and memos, computer-based information such as email or computer files on disk or tape, and any other medium that contains information about the organization or its business activities.

It’s important to retain or destroy records appropriately according to Humana policy. Records should not be tampered with, removed or destroyed before the specified date. If there is a legal hold, do not destroy any related records. (A “legal hold” is issued by the Law Department because of a current or reasonably anticipated litigation or other matter that suspends the applicable Humana record retention period.) Refer to the Record Retention Program in Policy Source if you have questions.

The Bottom Line

To preserve integrity, treat each business communication as though it could be seen publicly.
Information protection acceptable use

Humana’s information and Information Technology (IT) Systems are critical and important corporate assets, so we’ve established appropriate measures to protect them. These measures help maintain confidentiality, provide data integrity, system availability and user accountability. Refer to the Information Protection Acceptable Use Policy in Policy Source. Here’s what you should know:

- All associates must acknowledge the requirements of the Information Technology Security Agreement when beginning a relationship with Humana—and annually thereafter during Ethics & Compliance Training—and must strictly adhere to its provisions.

- You’re accountable for maintaining the confidentiality of your user access account information, especially all passwords, and should not write down passwords, ask for another's password, give a password to anyone or use the same password for business and non-business purposes.

- Activity on Humana IT systems is monitored. Users should have no expectation of privacy for any or all activity conducted in, on or through Humana IT systems or devices. Humana reserves the right to inspect, monitor, access, read, copy, modify, delete or disclose any and all information and files residing on Humana IT Systems, as well as files considered to be private or shared.

- Humana maintains technical security measures to guard against unauthorized access to, or modification of, information transmitted over an electronic communications network.

- Associates and other users must use Humana IT Systems primarily for business purposes. Inappropriate use of Humana IT Systems—including the use of acronyms, symbols or abbreviations commonly understood as profane, sexual or otherwise inappropriate—is strictly prohibited.

- Associates and other users should not send confidential, internal or restricted information to their personal email accounts. Keep this information protected by not storing it on non-Humana systems and devices. Refer to the Acceptable Use of Untrusted Devices (AUUD) & Bring Your Own Device (BYOD) Programs: Security Considerations document for more information.

- Behavior and judgment in an electronic “social” environment should mimic behavior in a physical setting. Refer to the Social Media Policy, in the Associate Support Center, for principles of good behavior and judgment.

Humana has an obligation to ensure that IT systems are used appropriately and that proprietary or confidential information is protected. All associates must assist in protecting these systems, as outlined in the Information Technology Security Agreement that each associate, and all others who have systems access, must electronically acknowledge his or her agreement to during Ethics & Compliance Training.

Misuse of Humana IT Systems may result in disciplinary action up to and including, but not limited to, termination of employment. Civil and criminal penalties also may apply.
Reporting of suspected privacy or security violations

If you suspect a privacy and/or security violation, you must follow the Reporting a Suspected Privacy or Security Policy Violation Procedure in Policy Source and promptly report it by choosing the step you feel most comfortable following:

• Report the issue to your leader.
• Report the issue to the next level of leadership.
• Report the issue to HR4U at 1-888-431-4748 or HR4U@humana.com.
• Report the issue to Humana’s Ethics Office at ethics@humana.com.
• Call the Ethics Help Line at 1-877-5-THE-KEY or report your concern(s) at Ethicshelpline.com. You can report the suspected violation anonymously.
• Report information security/asset loss theft issues to the Forensic Security Investigations 24/7 Hotline number at 502-476-2655.
• Report physical security issues to Humana Safety and Security Incident Reporting. Complete an incident report at go/reporting or call the 24/7 Humana Fusion Center at 1-800-992-8566 or 502-476-4444.
• Humana Government Business: Humana Government Business associates should review policies and procedures on the Humana Government Business SharePoint home page, or to report a suspected privacy or security violation, contact the Humana Government Business Privacy Official at 1-866-838-8242 or HumanaMilitaryPrivacy@humana.com.

If you’re an associate in a leadership role and learn of a suspected privacy and/or security violation, contact HR4U at 1-888-431-4748 or HR4U@humana.com, the Ethics Office or the Ethics Help Line.

All associates who violate or fail to comply with the policies and procedures will be subject to disciplinary action, up to and including termination of employment, and may be subject to civil and criminal penalties.

Refer to the resources below for additional information on information protection

Refer to the Data Classification and Labeling Policy in Policy Source for more information about Public, Humana Internal, Humana Restricted and Confidential information classifications.

Refer to the Device & Media Controls Standard in Policy Source for more information on social media etiquette.

Email the Privacy Office for guidance on any privacy issues at PrivacyOffice@humana.com or Humanamilitaryprivacy@humana.com for Humana Government Business privacy related issues.

Refer to the Data Classification and Labeling Policy; Communication Security; and Clean Desk, Clean Screen Standard documents in Policy Source for more information on what you can do to protect Humana’s information.
Doing business with U.S. and foreign governments

Working with the government comes with its own set of requirements—here’s how to stay in compliance with the laws that guide Humana’s interactions with U.S. and foreign governments.

Follow the links below to learn more.

- **Procurement Integrity Act**
- **Contracting with the government**
- **Hiring former and current government employees or elected officials**
- **Working with government agencies**
- **Maintaining the standards of accrediting agencies**
- **Doing business with foreign governments, contractors or consultants**

Ethics Help Line:

- **1-877-5-THE-KEY (1-877-584-3539)**
- **Ethicshelpline.com**
- **ethics@humana.com**
Procurement Integrity Act

Humana’s policy is to avoid even the appearance of impropriety, so we comply with the Procurement Integrity Act in all respects. The Procurement Integrity Act (the Act) prohibits Humana, as a federal contractor, from:

- Receiving contractor bid or proposal information that would give Humana an unfair competitive advantage.
- Giving anything of value to a procurement official.
- Giving, discussing or making an offer of employment to a federal government or military procurement official or certain family members. Some procurement officials have a two-year ban—and some have a lifetime ban—on employment discussions with Humana.

Violations of the Act committed by contractors or their employees are punishable by fines and imprisonment, loss of government contracts and/or suspension or debarment from participating in federal procurement opportunities.

Contact the Humana Government Business Compliance Official or Law Department for more information.

THE BOTTOM LINE
Get approval before discussing the employment or contracting of current or former government employees.
Contracting with the government

Because contracts with the government include explicit requirements, it’s essential that any Humana associate doing business with the government stays in strict compliance with all laws and regulations.

If you communicate with government officials or work with government contracts, make sure you’re familiar and comply with applicable laws and regulations.

Hiring former and current government employees or elected officials

We always want to avoid any conflicts of interest, and hiring a current or former elected official could create the appearance of a conflict. That’s why there are specific rules about former government employees working for government contractors like Humana. You must obtain approval from the Law Department, Corporate Affairs and Human Resources prior to discussing the employment of:

• Current military
• Former military
• Local, state or federal government employees
• Current and former elected officials

The same approval is necessary when retaining any of the above as a consultant.

In order to further avoid any conflicts of interest, the hiring of certain current officials can only be approved by Humana executives. It is prohibited to hire current national, federal, state, regional, provincial, municipal or local government employees or current elected officials absent express written approval from the Chief Administrative Officer, the Chief Legal Officer and the Chief Corporate Affairs Officer.

Working with government agencies

Inform Humana’s Regulatory Compliance and Law Departments immediately if you are notified of a violation, or receive communication or citations from governmental regulatory agencies. Humana Government Business associates must also contact HGBCompliance@humana.com and/or HumanaMilitaryPrivacy@humana.com.

Make sure you:

• Never destroy or alter any document or record in anticipation of a request for the document or record by a government agency or court
• Never lie or make false or misleading statements to any government investigator
• Never persuade anyone to provide false or misleading information to a government investigator
• Never access, use or disclose Defense Health Agency (DHA) or Veteran’s Health Administration (VHA) information without permission, as described under the terms of the contract
Maintaining the standards of accrediting agencies

Humana’s plans are accredited by outside agencies. It’s important that all Humana associates:
• Abide by the standards of these agencies
• Provide accurate information in a timely manner
• Communicate with all accrediting agencies directly, openly and honestly—never mislead them in any way

Utilization Management (UM) is one health plan function that accrediting agencies address. Associates should understand that:
• UM decision-making is based solely on appropriateness of care and service and the existence of coverage
• Humana does not reward practitioners or other individuals for issuing denials of coverage
• Financial incentives for UM decision makers do not encourage decisions that result in underutilization
• Humana does not make decisions about hiring, promoting or terminating practitioners or other staff based on the likelihood, or the perceived likelihood, that the practitioner or staff member supports or tends to support denial of benefits

Humana receives accreditation from the following agencies
AAAH (Accreditation Association for Ambulatory Health Care)
Assists ambulatory healthcare organizations in improving the quality of care

CHAP (Community Health Accreditation Program)
Accredits for private-duty nursing

CORE (Committee on Operating Rules for information Exchange)
Standardizes information provided to healthcare providers

JCAHO (The Joint Commission, formerly known as Joint Committee for Accreditation of Healthcare Organizations)
Accredits and certifies healthcare organizations and programs

NCQA (National Committee for Quality Assurance)
Evaluates the quality of key processes and systems health plans provide their members

URAC (formerly known as the Utilization Review Accreditation Commission)
Accredits healthcare companies—URAC is the nation’s largest accreditor
Doing business with foreign governments, contractors or consultants

U.S. and international laws can be very complex when it comes to business dealings with foreign officials. That’s why we need to be aware of the Foreign Corrupt Practices Act (FCPA) and anti-corruption laws of other countries (to the extent that we conduct business or have third-party relationships there).

What’s prohibited

The FCPA and other applicable anti-corruption laws prohibit giving, or offering or promising to give, any type of gift, payment, entertainment, gratuity or anything of value to a foreign official, political candidate, political party, party official, public international organization, their employees or their representatives for the purpose of obtaining, retaining or directing their business to any person for the purpose of influencing an official act or decision or securing an improper advantage.

To whom the laws apply

These laws apply to interactions with foreign officials, who include: personnel (i.e., officers and employees) of the state, any department, agency, state-owned companies or enterprises, institutions or people’s organizations engaged in public service, political party officials and candidates for political office, and anyone acting in an official capacity for or on behalf of any government, agency, instrumentality, municipality, or a public international organization, etc. This includes employees of government owned enterprises and public international organizations, regardless of rank or title, such as: hospitals, healthcare providers, the International Red Cross, etc.

Penalties for violations

The FCPA has specific criminal and civil penalties for violations involving what may be considered bribery of foreign officials, political candidates, political parties, party officials, officers or employees of public international organizations. These penalties include, but are not limited to, criminal fines for Humana and suspension or debarment from participation in federal programs and fines and imprisonment for individuals convicted of such conduct. Accordingly, no gifts, gratuities or anything of value to obtain or retain business can be made, or promised to, such persons or entities without the express written approval from Humana’s Enterprise Risk and Compliance and Law Departments.

The Bottom Line

The rules around working with foreign officials are very complex—make sure you understand what’s allowed and contact Enterprise Risk and Compliance at compliance@humana.com for approval before you begin work.
What to do before interacting with foreign officials

Humana associates who intend to interact or conduct business transactions, either directly or indirectly, with foreign officials must obtain authorization to do so in advance from Humana senior management and instruction from Humana’s Enterprise Risk and Compliance and Law Departments regarding the FCPA. No contracts or business transactions with foreign officials may be initiated or finalized without the express written approval of Humana’s Enterprise Risk and Compliance and Law Departments. In addition, all Humana associates are required to review the section in this document titled Gifts, favors, travel and entertainment, in the Associate Support Center, before interacting with any foreign officials or their employees or agents.

Humana has an Anti-Corruption Program that includes the FCPA. This program represents Humana's commitment to prevent corruption and applies to all Humana associates and all those acting on behalf of Humana. Also refer to the Anti-Corruption Policy, located in Policy Source, for more information.

What it might look like for you

Mark, a Humana associate, is having dinner at one of the most expensive restaurants in Kentucky with some private business representatives and their spouses from a company based in the United Arab Emirates (UAE). During the course of their conversation, Mark learns that one of the spouses is a high-ranking employee for the Insurance Authority in the UAE, which is the governmental agency that regulates insurance companies doing business in the UAE. The dinner conversation focuses on how eager the UAE company is to do business with Humana, as well as the process for Humana obtaining authority to do insurance business in the UAE. Always looking to be a good host and knowing that he may need to call upon his new contact at the UAE Insurance Authority, Mark insists that he pay for the entire dinner. In addition, he gives them all box seat tickets to the Bon Jovi concert, which happens to be that evening, and provides limousine services to the concert and back to their hotel.

Did Mark do anything wrong by paying for everyone’s meal?

Yes. While providing a usual and customary business meal in conjunction with the discussion and presentation of a company’s products or services is permissible under the FCPA, Mark raised FCPA red flags when he paid for an expensive meal, concert and expenses for a foreign official. Foreign official is defined broadly to include an employee of a governmental agency or the immediate family member of such employee.
Fraud, waste and abuse

Preventing, detecting and correcting fraud, waste and abuse

Follow the links below to learn more.

Inspire health

What is fraud, waste and abuse?

Humana’s efforts to combat fraud, waste and abuse

Whistleblowers

Anti-Money Laundering and Office of Foreign Assets Control Program

Regulations, resources and more

Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)

📧 Ethicshelpline.com

📧 ethics@humana.com
Inspire health

Fraud, waste and abuse isn’t just harmful to Humana, it also impacts our entire industry, as well as the entire healthcare system. If we all knew what to watch for to protect our company, co-workers, customers and business partners from fraud, waste and abuse, we could contribute to maintaining a healthcare system that’s more affordable to all. This section will help you understand what fraud, waste and abuse looks like, so you can raise a flag when you see it or become aware of plans or actions related to it.

PICTURE THIS
A co-worker asks you about a claim—she’s noticed that a doctor frequently charges for tests that aren’t performed. She wonders if she should chalk it up to a clerical error or follow up with the doctor. You tell her that it could be fraud and recommend she report it as soon as possible to the Special Investigations Unit.

Good call—read on to find out more about how to identify and prevent fraud, waste and abuse at Humana.

You contribute to an environment of well-being every time you put a stop to fraud, waste and abuse—and you inspire health in the process.
What is fraud, waste and/or abuse?

Fraud, waste and/or abuse includes actions such as:

• Defrauding or attempting to defraud the healthcare system
• Lying, using false pretenses or making false statements or promises to get money from the healthcare system
• Using the identifying information of another person to defraud the healthcare system
• Misusing resources or services, which results in unnecessary costs to the healthcare system
• Taking any action that leads to a payment from the healthcare system that is improper, for substandard care or for medically unnecessary services

Even if you don’t intentionally lie or misrepresent facts, your actions could result in waste or abuse if anyone, including you, is paid by the healthcare system without actually being entitled to the money.

The government can impose a civil penalty requiring payment of financial damages and, in some cases, a criminal penalty in the form of a prison sentence for fraud, waste and abuse.

Also, anyone who knowingly (which includes deliberate ignorance or reckless disregard of the truth) submits, or causes someone to submit, a false or fraudulent claim for payment to the government violates the False Claims Act.

The Bottom Line

All associates and members of the Board of Directors are obligated to report suspected fraud, waste and abuse or compliance concerns, pertaining to Humana associates, members, prospective members and/or business partners, immediately to Special Investigations Referral at 1-800-614-4126, siureferrals@humana.com or the Ethics Help Line. You won’t be retaliated against for doing the right thing. Humana prohibits intimidation of anyone with knowledge of possible or actual violations of Humana policies and government regulations and laws.

Some types of fraud

CLAIMS: filing fictitious claims, including medical and pharmacy claims

IDENTITY THEFT: stealing another person’s identity, physician’s ID numbers or prescription pads

DOCTOR SHOPPING: visiting multiple doctors or emergency rooms for narcotics

PROVIDER FRAUD: billing false claims, adding modifiers or up-coding

MISREPRESENTATION: misrepresenting personal information to enroll in a plan

BILLING: submitting false claims, pass-through billing

AGENT FRAUD: enrolling individuals in a non-existent plan, offering cash payments to enroll, conducting unsolicited door-to-door marketing of Medicare Advantage or Prescription Drug Plans or misrepresenting plans

EMPLOYER FRAUD: enrolling ineligible individuals, providing inaccurate hire or termination dates, providing false information
Watch out for these types of fraud, waste or abuse

You’re a Customer Care Specialist
• A member says he was billed for a test that wasn’t performed
• A member says she was offered cash or other incentive to join the plan
• A pharmacy calls to say they have filled numerous identical prescriptions for one member from different doctors
• An employer asks to change the date of hire for someone who has already been enrolled in a plan
• A member calls to say that he suddenly started to receive DME supplies and pain creams for no current medical condition

You’re a Claims Specialist
• A member has visited multiple doctors to get the same prescription in a relatively short time period
• A provider’s prescriptions seem inappropriate for the member’s condition (medical necessity)
• A provider submits a claim for a test that wasn’t performed

Humana’s efforts to combat fraud, waste and abuse

To support federal and state laws that have regulations pertaining to fraud, waste and abuse, Humana has an overarching program to prevent, detect and correct it. Our Special Investigations Unit analyzes data, conducts investigations and collaborates with government agencies to control fraud, waste and abuse, while Humana’s Enterprise Investigations Consortium coordinates the activities of various departments that investigate fraud.

Want to read more about the state and federal laws related to fraud, waste and abuse? See a list in the Regulations, resources and more section of this chapter.

Whistleblowers

A whistleblower is someone who reports suspected or detected misconduct that would be considered an action against company policy or federal or state rules, laws or regulations. In the context of the False Claims Act, whistleblower protections apply to actions taken to prevent False Claims Act violations. These whistleblower protections prevent retaliation against the whistleblower. If any retaliation does occur, the whistleblower has a right to obtain legal counsel to defend the actions he or she has taken.
Anti-Money Laundering and the Office of Foreign Assets Control

Humana has an Anti-Money Laundering (AML) Program that prohibits all associates from participating in money laundering, which is the illegal practice of “cleaning” proceeds derived from or intended for criminal activity through legitimate seeming transactions. Humana’s AML Program also provides additional requirements as needed based on assessed risks associated with Humana’s covered products, which are insurance products with features of cash value or investment, such as whole life insurance and annuities. This program is designed to reasonably prevent Humana from being used by others to facilitate money laundering and the financing of terrorist activities. Humana also has an Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) Screening Policy which outlines Humana’s processes to identify individuals and entities with which we are prohibited from dealing based upon certain federal laws and sanctions policies that prohibit dealings both with specified individuals and entities, as well as broader classes of individuals and entities from particular countries, such as Iran and Cuba. Humana conducts regular screening of its associates, directors, suppliers, and customers in order to ensure its compliance with sanctions laws.

An associate’s failure to comply with applicable law, including the Bank Secrecy Act and Humana’s Anti-Money Laundering Program, could:

• Impact the associate’s performance evaluation
• Result in disciplinary action, including termination of employment
• Result in civil and criminal sanctions

Regulations, resources and more

Refer to the following resources for additional information on fraud, waste and abuse

For convenience, here’s a summary of the key laws that pertain to fraud, waste and abuse.

Anti-Kickback Laws

The federal Anti-Kickback Law prohibits anyone from asking for or receiving, or offering or giving, anything that has value in exchange for any of the following:

• Referrals for goods or services paid for (even in part) by a federal healthcare program
• Buying, leasing or ordering a facility, service or item paid for (even in part) by a federal healthcare program
• Recommending or arranging for someone else to buy, lease or order a facility, service or item paid for (even in part) by a federal healthcare program

Value means the value of an item or service in the marketplace; it is not the cost of the item or service to the giver. Also note that most states have laws that prohibit kickbacks, bribes and rebates.

Anti-Inducement Statute of the Civil Monetary Penalties Law

The Anti-Inducement Statute prohibits anyone from offering or giving anything that has value to a Medicare or Medicaid beneficiary that is likely to influence the beneficiary to use a particular provider for Medicare- or Medicaid-covered items or services.
**Stark Law (Physician Self-Referral Prohibition Statute)**

This federal statute prohibits a physician from making a referral for certain health services to an entity in which the physician (or a member of his or her family) has an ownership/investment interest or with which he or she has a compensation arrangement. The government has carved out specific exceptions to this prohibition that must be strictly followed, otherwise, any claim tainted by an arrangement that does not fit within an exception is not payable.

**False Claims Act**

The False Claims Act is a federal statute that imposes liability on any individual who knowingly, recklessly or with deliberate ignorance:

- Submits or causes someone else to submit to the government a false or fraudulent claim for approval or payment
- Makes, uses or causes someone else to use a false record or statement to get a claim paid or approved by the government
- Has possession or control of the government's money or property and delivers or causes someone else to deliver less than all of the government's money or property
- Makes a false record or statement related to an obligation to pay the government or conceals, avoids or decreases an obligation to pay or transmit money or property to the government
- Conspires to do any of the above

**Click the links below to learn more**

- **Humana's Anti-Fraud Plan**
- **Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) Screening Policy**
- **Humana Medicare and Medicaid Compliance and Fraud, Waste and Abuse Control Program**

REPORT SUSPECTED INCIDENTS of fraud, waste or abuse to Special Investigations Referral at 1-800-614-4126, or siureferrals@humana.com or the Ethics Help Line.

For more information or if you have questions about these regulations, please contact Humana Compliance at compliance@humana.com.
Workplace conduct and employment practices

Promoting a safe, secure, diverse and inclusive Humana

Follow the links below to learn more.

Cultivate uniqueness
Inclusion and diversity (I&D) and our employment practices
Hiring associates of an outside auditor
Individuals ineligible for employment and contracting
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Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)

✉️ Ethicshelpline.com
✉️ ethics@humana.com
When you seek different perspectives and respect one another, you cultivate uniqueness.

Cultivate uniqueness

We strive to create an environment that’s welcoming, supportive and safe because that’s what helps us do our best work. Read on to find out how cultivating uniqueness helps us maintain a great workplace for everyone at Humana.

PICTURE THIS
You’re organizing a brainstorming meeting and someone suggests you invite a few people who aren’t usually included in ideation sessions. That’s when you realize—involving diverse viewpoints in collaboration isn’t just the right thing to do, it’s how we do right by our members. Read on to learn more about Humana’s stance on workplace conduct and the employment practices that contribute to creating a great Humana.
Inclusion and diversity (I&D) and our employment practices

Inclusion and diversity drive innovation. That’s why Humana recognizes the important role equal employment opportunity and affirmative action play in ensuring we have a diverse workplace that embraces the ideas of many.

When all of us support inclusion and diversity initiatives at Humana, we contribute directly to:

• Success
• Innovation
• Commitment
• Engaged associates

• Competitive advantage
• Consumer trust and confidence
• Emotionally connected consumers

EEO and AA compliance

Humana provides equal employment opportunity (EEO) for all individuals without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, veteran status or marital status. Our policy is to provide equal opportunity for all associates and applicants for employment as defined by federal, state and local laws.

EEO compliance

Specifically, Humana:

• Recruits, hires, trains and promotes persons without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, veteran status or marital status.

• Administers other personnel-related activities (compensation, benefits, promotions, transfers, layoffs, returns from layoff, Humana-sponsored training, educational assistance and social and recreational programs) without regard to race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, veteran status, or marital status.

• Encourages a culturally diverse workforce and makes employment decisions based on principles that promote equal employment opportunity.

• Advises all leaders that they’re responsible for ensuring that nondiscrimination prevails throughout every aspect of employment.

Humana’s compensation philosophy is that pay should be market-based and reflective of the skills needed for a job, as well as an associate’s capabilities. We recognize associates for their skills and accomplishments related to their job. Race, color, religion, sex, sexual orientation, gender identify or expression, national origin, age, disability, veteran status, or marital status will not be considered while making compensation decisions.

• This policy is applied across all opportunities to impact an associate’s pay: starting salary, any salary change, promotions, realignments, short- and long-term incentives, recognition, etc.

• Humana routinely and consistently evaluates starting salaries, salary increases, promotion decisions, performance evaluation ratings, and any other factor relevant to base pay.
**Affirmative Action compliance**

To strengthen its commitment to EEO, Humana has established an Affirmative Action (AA) program that strives to ensure that minority and female representation in all jobs is proportionate to the number of qualified minorities and women in each recruitment area. As a federal contractor, Humana prepares and implements annual, written affirmative action plans. Hiring goals and utilization benchmarks are set for individuals with disabilities and protected veterans. To find out more about Humana's AA program, contact the Office of Inclusion and Diversity.

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**I’d like to help create an inclusive and diverse workplace. Are there any ways I can get involved in I&D at Humana?**

Yes. In fact, we have several Network Resource Groups (NRGs) that cultivate I&D. Visit [go/diversity](#) to find out how you can join an NRG and foster diversity at Humana.

Visit [go/diversity](#) to learn more about Humana's Inclusion & Diversity Program.

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**Hiring associates of an outside auditor**

Humana must compete for talent—often outside our industry—to create a workplace that's diverse and competent in a broad array of areas. There are regulations and laws that govern how we search for talent, and we strive to stay compliant with those provisions.

In response to the Sarbanes-Oxley Act, the Securities and Exchange Commission prohibits us from hiring a member of an outside audit engagement team to work in a financial reporting oversight role at Humana within one year of the last audit.

Offers of employment in a financial reporting position to associates of Humana's outside auditors must be approved in advance by Humana's Controller, the Chief Financial Officer and Chief Legal Officer. Refer to the Hiring Associates of Outside Auditor policy in Policy Source.

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**Individuals ineligible for employment and contracting**

Humana is subject to strict governmental regulation and oversight. The government requires that Humana refrain from hiring or contracting with individuals who have engaged in certain types of activities. Individuals will be ineligible for hire or continued employment or any contractual relationship if they have been:

- Convicted of a criminal offense related to healthcare
- Convicted of any felony involving dishonesty or a breach of trust
- Listed on the Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons List (SDN)
- Listed on the Department of Health and Human Services Office of Inspector General (OIG) or System for Award Management (SAM) Exclusion lists as debarred, excluded or otherwise ineligible for participation in federal healthcare programs
- Listed on the Preclusion List, distributed by the Centers for Medicare & Medicaid Services (CMS), to Sponsors of plans for Medicare-eligible beneficiaries
Humana reviews the preclusion and exclusion lists prior to hiring or contracting with individuals, and monthly thereafter. These actions ensure that none of the individuals, directly contracted or employed, are precluded, or excluded or become precluded or excluded from participation in federal programs. Humana reviews the SDN List upon hire and semi-annually thereafter.

Associates are required to complete a Criminal Offense form during Ethics & Compliance Training (within 30 days of hire and annually thereafter) to disclose any convictions or sanctions. Associates must notify HR4U in writing within five (5) days if convicted of (a) any criminal offense related to healthcare and/or identity theft, or other fraudulent act (including credit card fraud), (b) any felony offense (includes traffic), or (c) any violation of a criminal drug statute where such drug-related violation occurred on the job or on company premises. Associates also must notify HR4U in writing at HR4U@humana.com if listed as debarred, excluded or otherwise ineligible for participation in federal health programs.

Harassment

There’s no other way to say it: We don’t tolerate any type of harassment of our associates, including harassment based on factors protected by federal, state or local law like race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, veteran status, or marital status. Here’s more:

This specifically includes, but is not limited to, sexual harassment. Even if the harassment doesn’t violate the law, it may still constitute a violation of Humana policies. Any associate who violates this policy may be subject to disciplinary action up to and including termination of employment.

Harassment by or of another associate, a contractor, vendor, Humana member or anyone else on Humana premises or in the course of Humana business is absolutely prohibited. We don’t tolerate any situation where an associate’s submission to harassment is made either explicitly or implicitly a term or condition of employment; is used as a basis for employment decisions; or where harassment creates an intimidating, hostile or offensive working environment. See Humana’s Harassment policy in the Associate Support Center for examples of forms of harassment and for further detail.

Every one of us at Humana is responsible for reporting any incidents believed to constitute harassment (against you or others). You may report harassment to your leader, other leadership, HR4U, the Ethics Office or the Ethics Help Line. Humana leaders are required to report allegations of harassment to Human Resources as soon as they become aware. Human Resources will conduct a prompt and thorough investigation of the allegations and take appropriate actions to address them.

The Bottom Line

Harassment has no place at Humana and won’t be tolerated.
Drug-, alcohol- and smoke-free workplace

We want to create a drug-free workplace in keeping with the intent of the Drug-Free Workplace Act. Here’s what that means for you:

• Unlawful use of controlled substances and the misuse of prescription drugs are inconsistent with the behavior we expect of our associates
• Illegal drug use subjects all associates and visitors to unacceptable safety risks and undermines Humana’s ability to operate effectively and efficiently
• Unlawful manufacture, solicitation, distribution, possession, sale or use of a controlled substance, or the misuse of prescriptions in the workplace or while engaged in Humana business away from our premises is strictly prohibited at all times
• Alcohol consumption is prohibited at all times on Humana property (including rest periods), other than at Humana sponsored or approved functions
• If you’re convicted of a violation of any criminal drug statute, where such violation occurred on the job or on Humana premises, federal law requires you to notify Human Resources (HR4U at 1-888-431-4748 or HR4U@humana.com) no later than five days after such conviction

Drug and alcohol abuse

Many of us are aware of the dangers of drug and alcohol abuse, but it’s important that we all know there’s help. Humana offers the confidential Employee Assistance Program (EAP) to give associates information about these dangers and how to maintain a healthy lifestyle. You can voluntarily request help in dealing with a drug or alcohol problem by participating in the EAP without jeopardizing continued employment with Humana. For information or help, call the EAP directly at 1-877-509-0096 (call 1-866-500-6899 for Spanish or 1-800-735-2988 for TTY/TDD).

See Drugs and Alcohol policy located in the Associate Support Center for more information.

I’m concerned that a co-worker might be coming to the office under the influence of drugs or alcohol. I believe it’s affecting his or her work and personal life. Should I talk to someone about it?

If a co-worker exhibits behaviors that suggest they may be impaired due to the influence of alcohol or drugs, you should report it to your leader, other leadership, HR4U or the Ethics Help Line. The associate could be a danger to himself or herself or others. Please see Drugs and Alcohol policy for more information.

DID YOU KNOW?

You can ask for help dealing with a drug or alcohol problem by participating in the EAP without jeopardizing continued employment with Humana. For information or help, call the EAP directly at 1-877-509-0096 (1-866-500-6899 for Spanish or 1-800-735-2988 for TTY/TDD).

SMOKE-FREE WORKPLACE

Humana is a smoke-free workplace. This means that smoking cigarettes, vaping and/or the use of similar products is prohibited at all times on Humana’s premises.
Personal use of company resources

We entrust our associates with a variety of company assets, from financial assets and time, to equipment, supplies, and space. We expect everyone to use these assets honestly and only for Humana purposes unless authorization for other uses is obtained in advance.

It's also important that each one of us protect what we've been entrusted with from loss, damage, misuse or theft. Using the internet or email excessively for non-business purposes is unacceptable.

If you become aware of any improper use of resources, notify your leader, other leadership, HR4U, the Ethics Office or call the Ethics Help Line.

Licensure, registration and certification renewals

Due to the nature of their role, many associates are required to be licensed and appointed by state agencies; Humana may also require an associate to participate in a registration or certification process.

If you’re in a position requiring licensure or certification, you’re responsible for registering for your license or certificate and keeping it current and in effect. No associate may be employed in such a position without the necessary registration, license or certification. If you allow a lapse or lose the registration, license or certification, you may be subject to termination of employment.

If you have questions, please contact the Enterprise Licensure and Credentialing Compliance Department at Enterprise_Licensure@humana.com

Safety and security

At Humana, we believe that no other asset in the company is as important as people. Humana is committed to safeguarding and protecting our key assets, people, property, information, our members and the communities that we serve.

We believe strongly that by integrating a culture of safety and security into all aspects of our business, we can provide our associates, contractors, members and visitors a safe and secure work environment.

Work-related injuries

• Report an incident at go/reporting.
• Associate injury/illness: Employment-related incidents that result or have the potential to result in an injury/illness to an associate, variable staffing pool (VSP), contractor or temporary worker. Incident examples include slips/falls, cuts, strains/sprains, needle sticks, animal bites, auto accidents and medical emergencies.
• Physical security incident: Any degree of theft, damage or sabotage to company property; actual and potential violence or intimidation involving associates, members, providers, vendors and other relevant third parties; and illegal and/or fraudulent activities.
Workplace violence

The safety and security of associates, customers, visitors or others on Humana premises is vitally important. Humana is committed to providing a safe, secure, violence-free work environment. We have a zero-tolerance policy for workplace violence and strictly prohibit associates, contractors, customers, visitors, anyone on Humana premises or anyone who engages in company-related activity from behaving in a violent or threatening manner. Humana prohibits firearms or weapons of any kind (guns, knives, explosives and other potential weapons) on Humana premises and prohibits associates and others from carrying weapons in the workplace or while participating in work-related activities.

All associates are expected to report all threatening behavior and violent incidents promptly and accurately, regardless of whether you are involved or whether or not physical injury has occurred. There will not be any reprisal or negative job consequence for making a report.

To report threatening or violent incidents:

• During an incident, you should not place yourself in peril, nor attempt to intercede.
• If there is an immediate emergency involving actual or potential violence, dial 911 and report as much as possible (name, location, floor, etc.), so an appropriate emergency response can be taken.
• As soon as it is safe to do so, but within 24 hours after the incident, you are required to provide prompt and accurate reports of all workplace violence and threats of workplace violence, or “close calls” to or by another associate, customer, visitor, vendor, contractor or anyone else on Humana premises or anyone who engages in a company-related activity—whether or not physical injury has occurred.
• Report all workplace violence incidents and threats to (HR4U) at 1-888-431-4748. HR4U will assist you in completing a Workplace Violence Incident Report.
• You may also report anonymously to the Ethics Help Line at 1-877-5-THE-KEY (1-877-584-3539).
• In addition, notify your leader as soon as possible. When reporting a threat or incidence of violence, you should be as specific and detailed as possible (your name, location, floor/suite, the names and/or number of persons involved, if weapons are involved, etc.).


If you’re a Humana Government Business associate, refer to the Procedures for Dealing with Workplace Violence policy found at Humana Government Business SharePoint.

The Bottom Line

Violence—even the threat of it—is unacceptable at Humana.
Environmental responsibility

We’re committed to being an environmentally responsible company that complies with all applicable environmental laws and regulations. We ask you to support this commitment by:

• Operating in full compliance with both the letter and the spirit of environmental, health and safety laws and regulations
• Encouraging care and regard for the environment among fellow associates and in the community
• Reporting any environmental, health and safety issues to leaders
• Identifying opportunities to improve environmental, health and safety programs
• Implementing emergency preparedness plans if necessary

Social media

Humana is committed to finding new and innovative ways to use social media to further its business objectives and support the responsible use of social media by associates inside and outside of the workplace.

When posting on internal or external social media, you have the opportunity to promote Humana’s goal of helping people achieve lifelong well-being. You represent Humana when posting on our social media sites, which is why it’s important that you post wisely. Be mindful to:

• Reflect Humana’s values and mission
• Protect Humana Confidential, Restricted or Internal information only
• Receive approval through Humana’s corporate review process prior to posting any social media content related to Medicare or Medicaid
• Prevent data leaks
• Avoid the introduction of malware into Humana systems

A co-worker has been sending inappropriate messages to me on Facebook. The messages are very upsetting. What should I do?

Report the situation to your leader, other leadership, HR4U (1-888-431-4748 or HR4U@humana.com) or the Ethics Help Line (1-877-5-THE-KEY or Ethicshelpline.com).
Follow the links below to learn more.

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Ethics Help Line:

📞 1-877-5-THE-KEY (1-877-584-3539)

✉️ Ethicshelpline.com

✉️ ethics@humana.com
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**Additional resources**

**Department contacts**
- Enterprise Risk & Compliance: compliance@humana.com
- Chief Compliance Officer: compliance@humana.com
- Compliance Department: compliance@humana.com
- Corporate Affairs Department: 502-580-1133
- Corporate Communications Department: 502-580-2990
- Employee Assistance Program: 1-877-509-0096
- Ethics Office: 502-580-3060 | ethics@humana.com
- Human Resources Department (HR4U): 1-888-431-4748 | 502-580-4748
- HR4U@humana.com
- Humana Main Switchboard: 502-580-1000
- HGBcompliance@humana.com
- Humana Safety and Security 24/7 Fusion Center: 1-800-992-8566 | 502-476-4444
- Internal Audit Department: 502-580-3505
- Investor Relations Department: 502-580-2811
- Law Department: 502-580-2750
- Office of Inclusion and Diversity: 502-580-3408
- Privacy Office: PrivacyOffice@humana.com
  HumanaMilitaryPrivacy@humana.com
- Special Investigations Unit: 1-800-614-4126 | siureferrals@humana.com

**NOTE:** The telephone numbers listed above may be subject to change.

**Other resources**
- Hi! (Humana intranet)
- Associate Support Center

**Ethics Help Line:**
- **1-877-5-THE-KEY (1-877-584-3539)**
- **Ethicshelpline.com**
- **ethics@humana.com**