



Ethics Every Day

Living our values, acting with integrity

Humana



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.
- 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) if they support Medicare business or Subcontractors if they support Medicaid. Some examples of third parties are healthcare providers, pharmacies, sales agents, sales agencies, vendors, suppliers, contractors and delegates. A third party must fulfill requirements to meet government expectations when a government contract is supported.

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.



Values + Ethics = health first

Dear Associates,

We are in the business of caring. It's who we are, it's how we work and it's the business we are in. Through caring for our members and each other, we can achieve our greatest goal: to put health first. To achieve this goal, we must remain steadfast in our commitment to act with integrity and achieve the highest ethical standards, something we've been doing for more than 50 years now. The values we share, along with a set of clear ethical principles, help us to 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 put health first. 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, but 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 caring, curious and committed, we can fulfill our purpose to impact the lives of people and transform the healthcare industry.



A handwritten signature in black ink, appearing to read "K. Hilzinger".

Kurt J. Hilzinger
Chairman of the Board



A handwritten signature in blue ink, appearing to read "Jim A. Rechten".

Jim A. Rechten
President and
Chief Executive Officer



A handwritten signature in black ink, appearing to read "Sean J. O'Reilly".

Sean J. O'Reilly
Chief Compliance Officer



Table of contents

Key to integrity	6
I am the key to integrity	7
I know what to do	8
I have help.....	9
I am safe from retaliation	10
I share our values	11
We stay informed and understand the consequences of our actions.....	11
We expect our leaders to set the example	12
Our Compliance Program.....	13
Conflicts of interest	14
Your decisions impact Humana	15
Disclosing potential conflicts.....	16
Outside employment and activities.....	17
Relationships with other associates and third parties.....	18
Business affiliations and financial investments and opportunities.....	19
Communications with the media, financial analysts and other outside persons/entities.....	19
Political contributions and activities	20
Lobbying	22
Community involvement and board memberships	23
Participation in professional societies and vendor seminars	24
Gifts, favors, travel and entertainment	25
Keeping compliant	26
Gifts.....	27
Receiving gifts	27
Giving gifts.....	28
Travel and entertainment.....	30
Health plan marketing practices	31
Fulfilling our purpose	32
Sales and marketing	33
Antitrust laws	35
Information protection	36
Maintaining trust	37
Information overview	38
Accuracy of information	39
Safeguarding information	40
Protecting personal information.....	42
Humana information	43
Insider information and securities trading.....	44
Creating and retaining business communications	45
Information protection acceptable use	46
Reporting of suspected privacy or security violations	47



Doing business with U.S. and foreign governments	48
Procurement Integrity Act.....	49
Contracting with the government	50
Hiring former and current government employees or elected officials	50
Working with government agencies	50
Maintaining the standards of accrediting agencies.....	51
Doing business with foreign governments, contractors or consultants.....	52
Fraud, waste and abuse	54
Committed to health first.....	55
What is fraud, waste and abuse?.....	56
Humana’s efforts to combat fraud, waste and abuse	57
Whistleblowers.....	57
Anti-Money Laundering and Office of Foreign Assets Control Program	58
Regulations, resources and more	58
Workplace conduct and employment practices	60
Remain Curious	61
Diversity, equity and inclusion (DEI) and our employment practices	62
Hiring associates of an outside auditor.....	63
Individuals ineligible for employment and contracting	63
Harassment.....	64
Drug-, alcohol- and smoke-free workplace	65
Personal use of company resources.....	66
Licensure, registration and certification renewals	66
Safety and security.....	66
Environmental responsibility	68
Social media	68
Index/Resources	69

Ethics Help Line:

 **1-877-5-THE-KEY (1-877-584-3539)**

 **Ethicshelpline.com**

 **ethics@humana.com**





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 \(1-877-584-3539\)](tel:1-877-5-THE-KEY)

 [Ethicshelpline.com](https://ethicshelpline.com)

 ethics@humana.com





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 caring 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 caring experience for our valued customer!



Always speak up against behaviors that are counter to our values.



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 56**) to **1-800-614-4126** or **siureferrals@humana.com** or the Ethics Help Line. CenterWell Home Health® should report suspected fraud, waste and abuse issues to the Ethics Help Line.
- **Humana Safety and Security Incident Reporting:** Complete a safety or security 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@humanamilitary.com**.



I share our values and put health first

My commitment to our beliefs, our identity and our values inspires me in my daily work as I put health first. I understand my actions and my commitment to our values help our business to thrive, our associates to feel engaged and our customers to experience human care.



CARING

Create an environment where people feel valued, respected and are treated with kindness.



CURIOUS

Work and learn together creating the best solutions for the people we serve.



COMMITTED

To fulfill our purpose, take bold action to impact the lives of people and transform the healthcare industry.

These values are underpinned by speaking up against behaviors that are counter to our values. Our Values of Caring, Curious and Committed are how we work each day. By living these values, we can fulfill our purpose of putting health first. Health first is our North Star. It guides our actions as we bring our strategy to life and helps us win in a competitive environment.

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 contracted third parties (including contracted sales agents or agencies) are required to report information. In coordination with the Law, Risk and Compliance departments, 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 Law, 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 (HGB), 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@humanamilitary.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 third parties

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 \(1-877-584-3539\)](tel:1-877-5-THE-KEY)

 [Ethicshelpline.com](https://ethicshelpline.com)

 ethics@humana.com





Your decisions impact Humana

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, tell him to apply online at the Humana website, 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.



Through a commitment to transparency, you help to differentiate and sustain our business for the future.



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 third parties, 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. **Refer to the Conflict of Interest Policy in the Associate Support Center for more information.**

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 third parties

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

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. Also, associates are not allowed to provide care/visits to relatives, or to individuals with whom they are in a relationship or living arrangement. 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. The Ethics Office will then work with Human Resources to see if the reporting relationship needs to change.



What if my relative works for a contracted third party, 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, third party, 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. **Refer to the Conflict of Interest Policy in the Associate Support Center for more information.**



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 third parties, 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

Only designated associates should provide information to the media, financial analysts, government officials and on social platforms to ensure that the corporate strategy and message are shared consistently and accurately.

Corporate Communications owns and manages all relationships with news media and must be consulted if you are approached for information or comment.

Financial analyst inquiries should always be directed to Investor Relations.

Any requests for information regarding government business must be directed to the Government and Corporate Affairs Department.

When it comes to social media posts, comments, responses, or likes and dislikes, consider the personal and professional impact and perception of your actions. Take time to stop, think and use your best judgment before sharing content on social media. When posting a point of view, associates should neither claim nor imply they are speaking on behalf of the company. Refer to go/social for the detailed policy.



Speaking engagements

Associates are often presented with opportunities to share their knowledge and experiences with external audiences. The Speaker Review Board is intended to review any public speaking engagements where media may be present and the topic being discussed relates directly to Humana's business, including but not limited to, government regulations or proprietary business practices. Stipends, fees, grants, honorariums, or other payments for speaking opportunities should be politely declined. Never explicitly or implicitly endorse vendors in any speaking engagement, or other communication. Visit [go/srb](#) to learn more about the Board and submit relevant speaking requests for review.

For a complete list of Humana's corporate review processes, refer to [go/corporatereview](#).

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 (PAC). 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 insurance coverage or other healthcare services 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.

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.



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 ([go/srb](#)).
- Stipends, fees, grants, honorariums or other payments from professional or other groups should, in general, be politely declined.

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 representatives for this now-contracted third party you worked with for their time spent on the agreement. So you buy some \$10 gift cards to a local coffee shop and distribute one to each of the third-party representatives who worked with you on the agreement. No problem there, right?

Correct. You can give gifts to third parties as long as they are no more than \$50 and not cash equivalent. (Third parties does not include members or prospective members in this example.) **(Refer to the Business Gift Policy.)** 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 Humana Government Business 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
- Entertainment
- Raffle winnings
- Favors
- Tickets
- Gratuities
- Free or discounted services
- Prizes
- Monetary awards from third parties
- Travel
- Drawings

Receiving gifts

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

Receiving from third parties (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 third parties 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, notepads 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.

You can never accept a gift of any kind in exchange for a referral. 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. You can never accept a gift in exchange for a referral. See Fraud, Waste and Abuse section regarding Anti-Kickback Laws for more information. Here are some guidelines:

Giving to third parties (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 & Medicaid Services (CMS) prohibits Medicare Advantage Organizations (e.g., Humana) from providing cash or other monetary rebates as an inducement for enrollment or otherwise offer gifts to beneficiaries, unless the gifts are of nominal value (as governed by guidance published by the Health and Humana Services Office of Inspector General (OIG). Any gifts given to Medicare beneficiaries must be offered to similarly situated beneficiaries without regard to whether or not the beneficiary enrolls, and may not be in the form of cash or other monetary rebates. Gifts 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 per year, per enrollee. The gift(s) cannot be cash, monetary rebates, cash equivalents or redeemable for cash. Refer to the **CMS Medicare Marketing Guidelines**. CMS and OIG have clarified that gift cards that are cash equivalent are prohibited. Gift cards that are cash equivalent are those that can be used as cash or easily diverted from their intended purpose (i.e. Amazon, Visa and other



“big-box” stores where a beneficiary can purchase a variety of items). Refer to the 42 CFR 422.2263(b)(2) and **OIG General Policy Statement Regarding Gifts to Medicare/Medicaid Beneficiaries**. For more information about gift giving to Medicare beneficiaries, contact the Law Department or Regulatory Compliance at compliance@humana.com.

- 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 CenterWell or CenterWell 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.
- 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, notepads, 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.

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.

Fulfilling our purpose

Sales and marketing

Antitrust laws

Ethics Help Line:



1-877-5-THE-KEY (1-877-584-3539)



Ethicshelpline.com



ethics@humana.com





Fulfilling our purpose

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 is strictly prohibited by CMS regulations. Read on to find out more about maintaining compliant marketing practices at Humana.



Delivering our commitments with excellence and integrity will ensure we are committed to our purpose of health first.



Sales and marketing

When marketing our products and services to prospective or current Humana customers and patients, 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 and sales representatives 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 & 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 regulations and 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 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. 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.

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 prescription drug and/or prescription drug plans participate in specialized training each year on Medicare, plan rules, benefits and how to compliantly sell our plans. They also have to pass required tests to demonstrate proficiency. 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.



I'm on the phone with a prospective Medicare member who keeps referring to her asthma and eczema—can I say she's not eligible because she is not healthy?

No—discrimination based on health status is strictly prohibited. You can't tell her she's not eligible for a Medicare Advantage or prescription drug plan based on her health status. 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.

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.



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 or patients.

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 and patients. 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 or patient 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.



We can all build trust with customers and associates through a transparent and caring approach.



Information overview

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

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

Internal, Confidential and **Restricted** 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.



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 customer information (excluding business contact names)



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)



RESTRICTED—(PROPRIETARY)

Sensitive corporate information intended for use only by named individuals or departments, and intellectual property. This includes, but is not limited to:

- Strategic plans
- Trade secrets
- Unreleased financial results
- Salary information



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 **Internal, Confidential** or **Restricted** information), this material must be safeguarded to prevent it from falling into the wrong hands.

Internal, Confidential or **Restricted** 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, **Internal, Confidential** or **Restricted** 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. **Restricted** or **Confidential** information, which includes member information, must 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 **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 Standard-**EIP - 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 – **EIP - Information Protection Acceptable Use** 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 Standard - **EIP - Workforce Identity and Access Management Policy**) 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 **Internal, Confidential** or **Restricted** information, follow these best practices:

- Adopt a “clean desk” habit for **Internal, Confidential** or **Restricted** information. Secure all **Internal, Confidential** or **Restricted** information, including protected health information (PHI), on white boards, in locked offices, desks or file cabinets when not in use.
- Practice the ‘Clean Screen’ standard. Lock your workstation when you step away for any period of time, and shutdown/restart your computer 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 **Internal, Confidential** or **Restricted** 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.)

- No matter the workstyle, (Home, Hybrid Home/Office, Field work) all associates, contractors or vendors must physically destroy documents and media containing **Internal, Confidential** and/or **Restricted** information beyond the ability to recover, when no longer needed.
- 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 **Internal, Confidential** and/or **Restricted** information in checked baggage. Never leave a laptop/other equipment/paperwork in a vehicle overnight, including in the trunk.
- Placing or storing **Internal, Confidential** and/or **Restricted** 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 a security review. There are other secure means of transferring sensitive information, such as secure file transfer protocol (SFTP).
- Follow all provisions of Humana's Standard - **EIP - Workforce Identity and Access Management, Policy - EIP - Information Protection Acceptable Use Policy (AUP)**, Standard - **EIP - External Communication Security** and Standard - **EIP - Clean Desk, Clean Screen**.

The Bottom Line

Do not print **Internal, Confidential** or **Restricted** information or remove it from Humana premises even to perform work away from Humana, in accordance with the **Policy– EIP - Information Protection Acceptable Use**.



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 homepage.

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 Privacy – Guide for Disclosure of Information**.
- Obtain consent from a customer or patient prior to releasing his or her protected information to an unauthorized third party. Refer to **Humana's Corporate Consent Procedure**.
- 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 **Internal, Confidential** or **Restricted** information may place Humana at a competitive disadvantage in the marketplace. Because of this risk, don't use any **Internal, Confidential** or **Restricted** 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. Presentations must not contain any Humana **Internal, Confidential** or **Restricted** information and should be approved in advance by Humana's Speaker Review Board at [go/srb](#).

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.

INFORMATION TECHNOLOGY SECURITY AGREEMENT

All associates must acknowledge the requirements in the Information Technology (IT) Security Agreement when beginning a relationship with Humana. Thereafter, the IT Security 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 and prescription drug plans. 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, 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, third parties 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, patient, 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, patient, 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 must 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 Policy - EIP - Information Protection Acceptable Use Policy in Policy Source. Here's what you should know:

- You're accountable for maintaining the confidentiality of your user access account information, especially all passwords. Never 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 must not send **Internal, Confidential** and/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 Policy - EIP - Information Protection Acceptable Use Policy for more information.
- When it comes to social media posts, comments, responses, or likes and dislikes, consider the personal and professional impact and perception of your actions. Take time to stop, think and use your best judgment before sharing content on social media. When posting a point of view, associates should neither claim nor imply they are speaking on behalf of the company. Refer to go/social for the detailed policy.

Humana has an obligation to ensure that IT systems are used appropriately and that proprietary and/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 the concern 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 Cyber Data Protection Operations (CDPO) 24/7 Hotline number at **502-476-5450**.
- 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 homepage, or to report a suspected privacy or security violation, contact the Humana Government Business Privacy Official at **HumanaMilitaryPrivacy@humanamilitary.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 Policy - **DGO - Data Classification and Labeling** in Policy Source for more information about Public, Internal, Confidential and/or Restricted information classifications.

Refer to the **Social Media/Business Use Policy** and the **Social Media/Associate Personal Use Policy** in Policy Source for more information on social media etiquette.

Email the Privacy Office for guidance on policy and procedural questions at **PrivacyOffice@humana.com** or **HumanaMilitaryPrivacy@humanamilitary.com** for Humana Government Business privacy related issues.

Refer to the Policy - **DGO - Data Classification and Labeling; Standard - EIP - External Communication Security; Standard - EIP - Secure Data Handling; and Standard - EIP - Clean Desk, Clean Screen** 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@humanamilitary.com** and/or **HumanaMilitaryPrivacy@humanamilitary.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

AAHC (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 Law, Risk and Compliance departments.

The Bottom Line

The rules around working with foreign officials are very complex—make sure you understand what's allowed and contact Law, Risk and Compliance at compliance@humana.com for approval before you begin work. Refer to **Humana's Anti-Corruption Statement**.



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 Law, Risk and Compliance 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 Law, Risk and Compliance 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.

Committed to health first

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**





Committed to health first

Every action has an impact on the health and lives of our customers. 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, patients and third parties 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.



Everything is connected. By protecting our company from fraud, waste and abuse you can help us to put health first.



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 third parties, immediately to **Special Investigations Referral** at **1-800-614-4126**, **siureferrals@humana.com** or the Ethics Help Line. CenterWell Home Health associates should report suspected fraud, waste and abuse concerns to 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, coding without supporting documentation, documenting/billing visits not provided, improper/inaccurate assessment data used to determine reimbursement, admitting patients that are not eligible for care

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 Durable Medical Equipment 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

You're a Documentation and Coding Specialist

- A claim lists diagnosis codes that were not documented by the provider
- Clinical documentation shows treating provider as an advanced registered nurse practitioner (ARNP) but the claim is billed under physician as the treating provider
- You notice the patient visit documentation is exactly the same as the last 3 visits

You're a Clinician

- You arrive at the patient's home but the patient rushes you through the treatment, not all care was performed. You complete the visit note documenting that all care was provided and the claim is paid by the payor.
- You arrive at the patient's home to find no answer to the door. You complete a visit note and sign the patient's signature, submit the visit note, and the claim is paid by the payor.

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.

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 Special Investigations Unit 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, equitable and inclusive Humana



Follow the links below to learn more.

Remain Curious

Diversity, equity and inclusion (DEI) and our employment practices

Hiring associates of an outside auditor

Individuals ineligible for employment and contracting

Harassment

Drug- and alcohol-free workplace

Personal use of company resources

Licensure, registration and certification renewals

Safety and security

Environmental responsibility

Social media

Ethics Help Line:



1-877-5-THE-KEY (1-877-584-3539)



Ethicshelpline.com



ethics@humana.com





Remain Curious

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 living our caring and curious values 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. By innovating simple, quality experiences, we can create value and turn the good into great. Read on to learn more about Humana's stance on workplace conduct and the employment practices that contribute to creating a great Humana.



When we're Curious, we better serve our members and patients and better support our fellow associates.



Diversity, equity and inclusion (DEI) and our employment practices

Diversity, equity and inclusion 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 all associates.

When all of us support diversity, equity and inclusion 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 Diversity, Equity and Inclusion.



I'd like to help create a diverse, equitable and inclusive workplace. Are there any ways I can get involved in DEI at Humana?

Yes. In fact, we have several Network Resource Groups (NRGs) that cultivate DEI.

Visit [go/inclusion](#) to find out how you can join an NRG and foster diversity, equity and inclusion at Humana.

Visit [go/inclusion](#) to learn more about Humana's Diversity, Equity and Inclusion Program

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.

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



- Excluded by any state Medicaid agency from participating in a state-based Medicaid contract, if such individual will support services provided under the applicable Medicaid contract
- Listed on any state exclusions list that must be reviewed when any work to be performed is in support of a government contract with a Medicaid component

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 they have been 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](#) or by the Associate Incident Report link under Safety & Security on the Conviva network.
- Associate injury/illness using the Associate Incident Report: 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. All work-related injuries/illnesses should be reported within 8 hours.
- Physical Security Incident Reporting: 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 in good faith.

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 8 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 Humana Safety and Security at **go/reporting** or by calling the 24/7 Fusion Center at **1-800-992-8566**.
- 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.).

See Humana’s Workplace Violence and Weapons policy and available training material at **go/threat**.

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 it comes to social media posts, comments, responses, or likes and dislikes, consider the personal and professional impact and perception of your actions. Take time to stop, think and use your best judgment before sharing content on social media. When posting a point of view, associates should neither claim nor imply they are speaking on behalf of the company. Refer to **go/social** for the detailed policy.

Be mindful to:

- Reflect Humana's Values and mission
- Protect Internal, Confidential and/or Restricted information
- 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).





Index and resources



Follow the links below to learn more.

Index

Additional resources

Department contacts

Other resources

Ethics Help Line:



1-877-5-THE-KEY (1-877-584-3539)



Ethicshelpline.com



ethics@humana.com



Index

A

Accreditation.....	51
Accuracy of Information	39
Affirmative action.....	62, 63
Alcohol-free	65
Anti-Inducement Statute of the Civil Monetary Penalties Law	58
Anti-kickback laws	58
Anti-money laundering	58
Antitrust laws.....	35

B

Board memberships	23
Business affiliations.....	19
Business communications	45

C

Chief Compliance Officer.....	13, 72
Community involvement.....	23
Company information.....	43
accuracy of	39
Humana confidential	38
Humana internal	38
Humana restricted.....	38
safeguarding	40
Confidentiality agreement.....	43
Confidential reporting of ethical violations	47
Conflict of interest	14, 16, 17, 21, 23
Corporate Compliance Program	3, 13

D

Disciplinary action	11, 12, 47, 57, 64
Disclosure.....	8, 9, 16
conflict of interest.....	16, 17
Diversity, equity and inclusion	62, 63, 72
Drug-, alcohol- and smoke-free	65

E

Employee Assistance Program	65, 72
Employment of relatives	18, 19
Entertaining public officials.....	22
Entertainment and travel.....	30
Environmental responsibility.....	68

Equal opportunity	62
Ethical principles	8
Ethical violations	8
failure to report	12
investigation of.....	10
reporting of.....	9
Ethics Help Line	6, 10

F

Failure to report ethics violations.....	12
False Claims Act	56, 57, 59
False reports	57, 59
Familial or personal relationships with other associates	16, 18
Favors and discounts	22, 25-27, 52
Financial investments.....	19
Foreign Corrupt Practices Act (FCPA)	39, 52
Foreign governments, contractors or consultants doing business with	50, 52
Fraud, waste and abuse	54

G

Gifts.....	27-30
Government contracting with	50
Government agencies working with.....	48-53
Government employees gifts, meals, & gratuities prohibited	27-30
hiring of	50

H

Harassment	64
Health and safety, environmental	64-68
Hiring associates of an outside auditor or elected officials	50, 63
Hiring relatives.....	18, 19
Humana information, safeguarding.....	40, 43
Humana's ethical principles	8
Humana's leaders, responsibilities	12



I	
Inclusion and diversity.....	62, 63, 72
Ineligibility for employment and contracting ...	63
Information, accuracy of.....	39
Information protection, acceptable use.....	46
Information technology	
security agreement	46
Information technology systems,	
inappropriate use	46
Insider information.....	44, 45
Integrity judgment test, questions.....	9
Investigation of violations	10
L	
Licensure and certification	66
Lobbying.....	22
M	
Marketing	31-35
Media, communicating with.....	19, 68
O	
Office of Foreign Assets Control (OFAC)	
Compliance Program.....	58, 63
Outside activities	17
Outside employment	17
P	
Personal or familial relationships	
with other associates.....	15, 16, 18, 19
Personal use of company resources	66
Political activities, contributions	
and participation.....	20-22
personal.....	20-22
Preclusion.....	63
Privacy or security violations.....	47
Procurement Integrity Act.....	49
violation of	49
Professional societies.....	24
Prohibition on retaliation.....	10
Protecting personal information	42
Public statements by employees.....	19

R	
Raising issues.....	9
Relatives	
employment of.....	18
Reporting ethics violations	9, 47
failure to report	47
suspected privacy or security violations	47
Responsibilities for Humana leaders.....	12
Retaining business communications	45
Retaliation against associates reporting	
violations, prohibition on	10
S	
Safeguarding information.....	36-47
Safety and security.....	66
Sales practices	31-35
Securities trading	44
Security or privacy violations	47
Social media.....	45, 68
Smoke-free	65
Stark Law – Physician Self-Referral	
Prohibition Statute.....	59
Substance abuse	65
T	
Travel and entertainment	30
V	
Vendor seminars	24
Violations	
failure to report	12, 47
investigation of.....	10, 47
reporting of.....	10, 47
Violence in the workplace	67
W	
Waivers.....	12
Weapons in the workplace	67
Whistleblowers	58
Workplace violence.....	67
Work-related injuries and illness	66



Additional resources

Department contacts

Chief Compliance Officer	compliance@humana.com
Compliance Department	compliance@humana.com
Corporate Affairs Department	Corporateaffairs@humana.com
Corporate Communications Department.....	CCommunications@humana.com
Employee Assistance Program	1-877-509-0096
Ethics Help Line	1-877-5-THE-KEY (1-877-584-3539) Ethicshelpline.com
Ethics Office	502-580-3060 ethics@humana.com
Human Resources Department (HR4U)	1-888-431-4748 HR4U@humana.com
Humana Main Switchboard	502-580-1000
Humana Government Business Compliance Official..	HGBcompliance@humanamilitary.com
Humana Safety and Security 24/7 Fusion Center	1-800-992-8566
Internal Audit Department.....	502-580-3505
Investor Relations Department	502-580-2652
Law Department	502-580-2750
Office of Diversity, Equity and Inclusion	502-580-3408
Privacy Office	PrivacyOffice@humana.com
Privacy Official (for Humana Government Business)..	HumanaMilitaryPrivacy@humanamilitary.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



Humana®

6/00, 9/04, 6/07, 9/08, 2/09, 9/09, 9/10, 9/12, 9/13, 6/14, 6/15, 5/16, 6/17, 7/18, 8/18, 7/19, 6/20,
6/21, 6/22, 6/23, 5/24, 7/24

© 2000, 2004, 2007, 2008, 2009, 2010, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020,
2021, 2022, 2023, 2024

GHC12940 0724