

Anti-Corruption Statement

Humana is dedicated to helping people improve their health and well-being. In order to achieve that goal, Humana has a steadfast commitment to act in a straightforward ethical, legal, and compliant manner at all times. Humana expects that its associates, as well as its business partners, will adhere to firm anti-corruption standards in all work they undertake on Humana's behalf.

Humana's Code of Conduct and Anti-Corruption Policy

Humana's Code of Conduct, *Ethics Every Day*, which applies to Humana's Board of Directors, associates, and employees of all affiliates and subsidiaries, affirms the company's strong commitment to compliance with all applicable laws, which includes anti-corruption laws and sets forth Humana's expectations and requirements in relation to the actions of all those subject to the Code of Conduct. Humana's Code of Conduct, *Ethics Every Day*, is accessible via this [Link](#).

Ethics Every Day makes clear that whenever Humana conducts business or has third-party relationships, the company must be aware of, and mitigate, potential anti-corruption risks.

The principles set forth in *Ethics Every Day* are supplemented by Humana's Anti-Corruption Policy. Humana's anti-corruption policy prohibits bribery and corruption and provides practical guidance for how to address anti-corruption risks. The policy includes procedures for contracting with third-parties, due diligence procedures, interacting with Humana's compliance and law departments, escalating anti-corruption questions, reporting allegations of misconduct, and the prohibition on facilitation payments.

Humana's Code of Conduct and Anti-Corruption Policy, along with several other Humana policies, detail when it is and is not permissible for Humana personnel to receive and accept gifts, meals, entertainment, travel, lodging, and money during the course of a business relationship or transaction.

Business Relationships

Humana carefully selects its business partners based on a set of rigorous internal due diligence procedures. Humana's process includes questionnaires for business partners to complete, employee attestations, business review meetings, and compliance and legal reviews, as needed.

Humana's Code of Conduct, Anti-Corruption Policy, and process for selecting business partners are designed to highlight and identify potential anti-corruption risks Humana faces in conducting business and how to prevent and mitigate anti-corruption risks when conducting business. Humana accomplishes this by ensuring that the appropriate procedures are in place and followed, and that the appropriate stakeholders have the necessary oversight and training to identify and help prevent anti-corruption from occurring during the course of conducting business, from the start of the business relationship, during contract negotiations, and through audits after the business relationship is established, when appropriate.

Executive Oversight and Management of Anti-corruption Program

Humana's Executive Leaders share in the company's strong commitment to anti-corruption. Among Executive Leaders, both the Chief Technology and Risk Officer and the Chief Legal Officer are key stakeholders in ensuring the ongoing effectiveness and successful implementation of Humana's anti-corruption program.

Humana's Chief Compliance Officer also provides key day to day oversight of Humana's anti-corruption program. Humana's anti-corruption program is resourced by competent attorneys and compliance professionals, and experienced business owners.

Annual Training

Humana prioritizes communicating the importance of anti-corruption to all employees. The company's annual *Ethics and Compliance* training, which is required of all employees, including management, includes guidance on Humana's anti-corruption policy and legal obligations.

Speaking Up

Humana encourages all employees to be alert to anti-corruption risks and report any concerns or potential misconduct. Humana employees can speak up using a variety of methods. Humana maintains a confidential ethics phone hotline (available 24 hours a day, seven days a week) that employees can use to report concerns or ask questions; they also can report concerns via the www.ethicshelpline.com website. In addition, Humana employees may raise concerns directly to their leader or the compliance department by phone or email.

Enforcement Actions

Humana is not, nor has it been, the subject of anti-corruption investigations or enforcement actions by U.S. or foreign authorities.