

Anti-Corruption Statement

Humana has a goal to help people achieve lifelong well-being. In order to achieve that goal, Humana has a steadfast commitment to act in a straightforward ethical, legal, and complaint 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, including 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 corruption and conflicts of interest risks.

The principles set forth in *Ethics Every Day* are supplemented by Humana's Enterprise Anti-Corruption Program Policy. Humana's Enterprise Anti-Corruption Program Policy prohibits bribery and corruption and provides practical guidance for how to address anti-corruption risks. Humana's Enterprise Anti-Corruption Program Policy defines the terms "bribery" and "corruptly" as follows:

Bribery: The payment, offer to pay, promise to pay, or authorization of payment of money or anything of value to a foreign official, directly or indirectly, to influence any act or decision of a foreign official to use his or her official capacity to secure any improper advantage or to obtain or retain business.

Corruptly: An offer, payment promise, or gift, is made "corruptly" if it is intended to induce the recipient to misuse his official position; for example, wrongfully to direct business to the payer or his client, to obtain preferential legislation or regulations, or to induce a foreign official to fail to perform an official function.

Humana's Enterprise Anti-Corruption Program Policy also includes procedures for contracting with third parties, conducting due diligence for mergers, acquisitions, and new ventures, escalating anti-corruption questions, conducting ongoing internal monitoring of certain vendors to detect bribery and corruption, and reporting allegations of misconduct.

Humana's Code of Conduct and Enterprise Anti-Corruption Program Policy, along with several other Humana policies, detail when it is and is not permissible for Humana personnel to provide gifts, meals, entertainment, travel, lodging, or other things of value during the course of a business relationship or transaction involving foreign officials.

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, associate attestations, business review meetings, and compliance and legal reviews, as needed.

Humana's Code of Conduct, Enterprise Anti-Corruption Program Policy, and other processes for selecting business partners are designed to both highlight the anti-corruption risks Humana faces in conducting business and guide how to best prevent and mitigate corruption and bribery risks when conducting business. Humana accomplishes this by ensuring appropriate procedures are in place and followed and stakeholders are provided appropriate oversight and training to identify and prevent corruption and bribery from occurring during the course of conducting business—including from the start of the business relationship, during contract negotiations, and through audits and other internal monitoring and oversight 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 Compliance Officer and the Chief Legal Officer are key stakeholders and have managerial responsibility for ensuring the ongoing effectiveness and successful implementation of Humana's anti-corruption program in order to prevent bribery and corruption. Humana's anti-corruption program is also resourced by competent attorneys and compliance professionals, and experienced business owners.

Conflicts of Interest

Humana has a robust process for when and how to report potential conflicts of interest. Humana's Board of Directors, associates, and employees of all affiliates and subsidiaries must complete a conflicts of interest form when they're hired, annually, and whenever a new potential conflict of interest arises or if a previously disclosed situation becomes inaccurate or changes. A conflict of interest is any activity, interest, or relationship that may: (i) compete with any of Humana's lines of business, (ii) involves providing services to a competitor, vendor, or other person or entity with which Humana has a business relationship, (iii) interfere with the performance of work duties, or (iv) constitute a conflict of interest with Humana. Humana's conflicts of interest processes are designed to quickly identify and eliminate or manage any potential conflicts of interest.

Speaking Up

Humana encourages all employees to be alert to anti-corruption risks and report any concerns or potential misconduct. Humana associates can speak up using a variety of methods. Humana maintains a confidential ethics hotline (www.ethicshelpline.com) that employees can use to report concerns or ask questions by phone, email, or web. Employees can access the hotline 24 hours per day, seven days per week. In addition, Humana associates 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.