



# CODE OF CONDUCT

Our Principles of Ethics & Integrity

UNITEDHEALTH GROUP®

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## Code of Conduct

# UNITEDHEALTH GROUP AND INTEGRITY

The people of UnitedHealth Group and its subsidiaries around the world (“UnitedHealth Group” or “the Company”) share five values that best describe how we aspire to conduct ourselves and our business: integrity, compassion, relationships, innovation, and performance. Together, these five values describe the behaviors that are expected of us by the people we interact with and serve. All of us must strive to apply this Code every day, both inside and outside of UnitedHealth Group.

Integrity purposefully leads the list. Integrity means we are reliably honest, fair, and morally responsible, always acting in the best interests of our customers, consumers, and the communities where we live and work. How we conduct

our work day-to-day is important to fulfilling our mission to help people live healthier lives and to help make the health system work better for everyone. Health care is among the most personal, intimate aspects of a person’s life, and each individual must be able to trust our commitment to integrity. It is the foundation for each of the four other values and everything we do at UnitedHealth Group.

The UnitedHealth Group Code of Conduct: Our Principles of Ethics & Integrity (“The Code,” “Code of Conduct,” or “Principles of Ethics & Integrity”) provides guidelines to help us sustain the highest possible standards of ethical behavior in our work.





# HONOR COMMITMENTS. NEVER COMPROMISE ETHICS.

## **We Believe**

We must be an enterprise that represents the highest level of personal and institutional integrity. With integrity, people and institutions will want to work with us, and our core purpose will not be compromised.

## **We Value Integrity**

We honor commitments. We never compromise ethics. We are known for living up to the highest standards of ethical behavior. We make honest commitments and consistently honor those commitments.

## **We Behave**

We speak the truth. We deliver on our promises. We have the courage to acknowledge mistakes and do what is needed to address them.

## Code of Conduct

Colleagues,

We are part of an organization whose mission is to help people live healthier lives and make the health system work better for everyone. More than 330,000 people across the globe share this experience with us. It is our responsibility to approach this work with honor and humility and hold ourselves to the highest standards of ethics and integrity. No matter your role at UnitedHealth Group, we are working to move this mission forward, and we do that through every interaction we have, large or small, every day.

Together, as an organization, we are working to expand access to high-quality, affordable care for everyone, and improve the experiences and health outcomes for providers and patients. We are determined to advance health equity – addressing and resolving the persistent disparities in our health system and investing to create a more diverse and inclusive health workforce that reflects the communities we are so privileged to serve.

Our shared values – integrity, compassion, innovation, relationships, and performance – are our daily touchpoints, our guiding principles. Think of this Code of Conduct, then, as our guidebook. It is an important reminder of the high standards to which we are accountable, and it is a promise we make to each other and to every patient, client, customer, member, and caregiver with whom we interact.

The work we do together has the potential to improve individual lives as well as the systems those individuals rely on. Our Code of Conduct acknowledges the significance of that responsibility and the depth of our commitment to working ethically and with integrity in everything we do.

Andrew Witty  
Chief Executive Officer, UnitedHealth Group

# ABOUT THE CODE OF CONDUCT

## Our Principles of Ethics & Integrity

Every UnitedHealth Group employee, director, and contractor must act with integrity in everything we do. Acting with integrity begins with understanding and abiding by the laws, regulations, Company policies, and contractual obligations that apply to our roles in the Company, our work, and our mission. The UnitedHealth Group Board of Directors has adopted this global Code of Conduct, which applies to all employees, directors, and contractors, to provide guidelines for our decision-making and behavior. This Code is a core element of the Company's compliance program. Each section includes tools to help you understand your responsibilities and find answers to questions: an explanation of each subject addressed by the Code, key considerations, hypothetical challenges, resources, and links to applicable policies. Policies at the enterprise, business, and department levels provide more specific direction.

### Complying with the Code of Conduct

Because the Code cannot address every situation you might encounter, UnitedHealth Group relies on your good judgment and values to uphold the spirit and intent of the Code. If you are ever unsure about what to do in a particular situation, discuss the issue with your manager and ask questions. We have many resources available to help you.

You must comply with this Code and all policies that apply to you. Managers have an additional responsibility to understand this Code and the policies that apply to your business units so that you may serve as a resource and provide guidance to employees. If you are uncertain as to how this Code or any policies apply to you and your function in the Company, or if you have questions, contact UnitedHealth Group Compliance & Ethics, HRdirect, or your business Legal Representative or Compliance Officer.

### Reporting Misconduct

If you encounter what you believe to be a potential violation of law, regulation, this Code, or Company policy, speak up. Speaking up is not only the right thing to do, it is also required by Company policy. UnitedHealth Group provides many ways to report ethical, legal, regulatory, and policy concerns, including the Compliance & Ethics HelpCenter. You have the option of reporting anonymously, where permitted by law, and, regardless of how you report, you are protected from intimidation and retaliation whenever you speak up in good faith. All reports will be reviewed and, if necessary, investigated.

Reporting potential Code or policy violations helps the Company address issues quickly and thoroughly. You also help us identify opportunities to provide guidance on how the Code and our policies apply in specific situations. You help us all to live the Company's values and fulfill its mission.

## Violations of the Code of Conduct and Policies

Violating this Code, Company policies, laws and regulations or our contractual obligations not only has potential legal and regulatory consequences, it also compromises UnitedHealth Group's reputation. Unethical or illegal acts can never be justified. No employee, regardless of his or her position, is ever authorized to commit, or direct another employee to commit, an unethical or illegal act. In addition, employees cannot use any third party to act in any way that is prohibited by law, this Code, any Company policy, or any contractual obligation.

All violations of this Code of Conduct, Company policies, contractual obligations, or laws will be taken seriously and may result in discipline, up to and including termination of employment and possible legal action, including referral to law enforcement.

## Waiver and Changes to the Code

Circumstances may arise where you believe that a waiver of the Code requirements is merited. Requests for waiver of the Code are rarely, if ever, granted. However, you may seek formal waiver of a specific requirement or obligation of this Code by submitting a written request to the UnitedHealth Group Chief Compliance and Ethics Officer. Most waiver requests will be determined by the UnitedHealth Group Chief Compliance and Ethics Officer, while those submitted by certain officers will be forwarded to the Audit Committee of the UnitedHealth Group Board of Directors for review and determination. Any waiver requested by UnitedHealth Group's Chief Executive Officer, Chief Financial Officer, Chief Accounting Officer, Controller, or persons performing similar functions (collectively known as the "Senior Financial Officers"), or any other executive officer or director that is granted by the Audit Committee will be publicly disclosed on UnitedHealth Group's website, to the extent required by U.S. securities rules and the New York Stock Exchange. No action prohibited by this Code should be taken without a written waiver from either the UnitedHealth Group Chief Compliance and Ethics Officer or the Audit Committee.

UnitedHealth Group's Chief Compliance and Ethics Officer may make non-material changes to this Code of Conduct, including updates to the resources, policies, and questions and answers provided. All material changes must be approved by the Audit Committee of the Board of Directors.





## Whom to Contact with Questions or Concerns

### Ask Yourself

When faced with a potential ethical issue, it may help to ask these questions:

- Could this harm the reputation of the Company?
- Am I certain my actions are legal?
- Am I being fair and honest?
- How will my actions appear with the benefit of hindsight?
- How will the situation be described in a newspaper headline?
- Will I sleep soundly tonight?
- What would I counsel a colleague to do?

### Your Manager

Often your first contact for workplace issues.

### HRdirect

**Internal:** <https://hub.uhg.com/sites/hub/Resources/Human-Capital-Help/Pages/default.aspx>

**External:** <https://hub.unitedhealthgroup.com/sites/hub/Resources/Human-Capital-Help/Pages/default.aspx>

**Phone:** (800) 561-0861 (U.S.) or find your country's dialing instructions via the intranet at the internal link above.

Your contact for policy guidance and interpretation, workplace issues, compensation, and employee benefit concerns.

### Compliance and Ethics

#### Compliance & Ethics HelpCenter

Available 24 hours a day, 7 days a week.

You can report anonymously, where permitted by law.

**Phone:** (800) 455-4521 (U.S.), or find your country's dialing instructions on the HelpCenter portal.

**Online:** [uhghelpcenter.ethicspoint.com](http://uhghelpcenter.ethicspoint.com)

Your contact for questions about or advice on interpreting and reporting violations of:

- The Code of Conduct;
- Company policies;
- Laws or regulations.

#### UnitedHealth Group Compliance & Ethics

**Phone:** (952) 936-7463

**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)

Your contact for issues regarding the Code of Conduct, policies, training, and other compliance and ethics-related matters.

### Enterprise Health & Safety

**Phone:** (888) 299-6427

**Email:** [healthandsafety@uhg.com](mailto:healthandsafety@uhg.com)

Your contact to report unsafe conditions and workplace hazards.

### Corporate Security

**Email:** [corporatesecurity@uhg.com](mailto:corporatesecurity@uhg.com)

Your contact to report workplace security concerns, including concerns about, or incidents of, workplace violence.

### Employee Assistance Program (EAP)

**Phone:** (866) 781-6396 (U.S.)

Employees outside of the United States can find information on the EAP in their country at <https://hub.unitedhealthgroup.com/pay-benefits/life-events/employee-assistance-program/Employee-Assistance-Program/165>

Your contact for help with health, family, substance abuse, and other personal issues.

### Your Business Legal Representative or Compliance Officer

Your contact for advice on legal and compliance issues associated with interactions with government officials, contacts with government entities, and political activity.



## Code of Conduct

# INTEGRITY

At UnitedHealth Group, we hold ourselves to the highest standards of personal and institutional integrity in our interactions with customers, members, patients, employees, health care professionals, partners, and other stakeholders, including governments and the public. We recognize that appearances matter when it comes to integrity.



## Our Commitments

At UnitedHealth Group, we commit to:

- Reviewing, understanding and complying with UnitedHealth Group's policies and standards of conduct that are applicable to your position and business;
- Avoiding making work decisions that affect your personal interests;
- Avoiding engaging in behavior that may inappropriately influence the conduct of business, including giving or accepting gifts or benefits.

## Act with Integrity

- **Recognize and address conflicts of interest.**  
Conflicts occur when you or your immediate family member's personal interests, relationships, outside employment, or activities affect, or appear to affect, your decision-making in your Company role. Conflicts can also occur between the Company's businesses, where one business unit could effectively exclude another business unit from conducting business with the government.
- **Follow UnitedHealth Group's policies on gifts and entertainment involving a business partner or vendor, including government officials and pharmaceutical, medical device, and biologic manufacturers.**  
Giving or receiving gifts or entertainment ("business courtesies"), such as tickets to a sporting event, a meal, or an invitation to a conference, may be inappropriate, and in some cases illegal. International business practices may be subject to additional or different standards and rules due to varying anti-corruption laws and local customs. Where required or if you are uncertain, seek approval from your manager and UnitedHealth Group Compliance & Ethics before giving or receiving gifts or entertainment.
- **Do not buy or sell any stock based on material, non-public information you have received.**  
You must never use or disclose to others material, non-public information about UnitedHealth Group or another company as the basis for buying or selling stock.
- **Do not use Company property, information, or your position for personal gain, or to compete with UnitedHealth Group.**  
Each of us has a duty to advance the Company's interests when an opportunity is presented. You may not use Company property, information, or your position with the Company to take advantage of corporate opportunities for your personal gain, unless the opportunity was first presented to and rejected by the Company, and you will not be competing with the Company's business activities.
- **Each director or employee involved in UnitedHealth Group's disclosure process is responsible for the accuracy and completeness of facts regarding the Company.**  
This includes representations to the Company's independent auditors, governmental regulators, and self-regulatory organizations. Directors and employees must review and critically analyze proposed disclosures or, where appropriate, delegate this task to others.
- **Maintain professional relationships.**  
You are expected to maintain appropriate, professional boundaries with members, patients, their families, and other customers. These boundaries may be determined by applicable laws and regulations, professional licensing boards, and enterprise policies. An employee's failure to maintain appropriate professional boundaries may result in disciplinary action up to and including termination of employment.

## Integrity of Books and Records

UnitedHealth Group is committed to the integrity of its records, books, and financial and other reporting. Employees are responsible for ensuring that all books, records, accounting, and reporting are accurate and complete, and properly reflect the actual transaction event recorded and are retained according to Company policy. In addition, U.S. securities laws impose specific obligations on each director or employee involved in the Company's financial disclosure process, including the Senior Financial Officers. The Senior Financial Officers and the individuals who assist them in the disclosure processes must be familiar with and comply with all controls and procedures that ensure that public reports and documents filed with the U.S. Securities and Exchange Commission meet the Company's obligations under U.S. securities laws and rules.

## Integrity Challenges

- Q. I ran into an old friend at a reunion and learned that she now works for a physician group that is part of our network. The following week, the friend left me a message asking to discuss a number of claims the physician group had filed that were rejected and are pending appeal. May I respond to her call?**
- A. Disclose the contact and your prior relationship to your manager before responding to the call. The Company may direct you to stay out of any business decision involving your friend's employer. Your manager will decide whether it's appropriate for you to respond at all.
- Q. I have received an invitation to join one of our regular office supply vendors at a professional sports event. Can I accept the ticket?**
- A. Perhaps. Submit your request to your manager, who will consider whether the cost of the ticket is consistent with policy, if there is a legitimate business purpose for the event, if the ticket will not influence or appear to influence your business judgment, and if allowed by applicable law. You must also follow any local compliance policies, which may require additional approvals. You may contact UnitedHealth Group Compliance & Ethics for additional guidance.
- Q. I received an invitation from a pharmaceutical company to attend a two-day conference at an exclusive resort. The subject of the conference is relevant to my job responsibilities, and the invitation includes travel, lodging, admission to the conference, entertainment, and all meals. May I accept?**
- A. The special rules that apply to our interactions with pharmaceutical companies generally state that you may not accept travel, lodging, or entertainment from a pharmaceutical company, even in connection with a relevant conference or educational event. However, you may be allowed to accept free admission to the conference only in limited circumstances (for example, if you are a speaker at the event and all speakers receive free admission) and if you have complied with your business's established approval processes and applicable law. Contact UnitedHealth Group Compliance & Ethics for additional guidance.
- Q. I have been invited to serve on the board of a non-profit organization that provides health care policy recommendations that are frequently referenced by insurance regulators and my local legislature. May I accept?**
- A. Because the organization may make recommendations that could impact UnitedHealth Group's business, there is a potential conflict of interest. Contact your manager and UnitedHealth Group Compliance & Ethics regarding the invitation.
- Q. I work on mergers and acquisitions and just received a call from an investment bank asking if UnitedHealth Group wants to participate in an investment syndicate for a small health IT start up company. I don't know if the Company is interested, but I am. Can I participate in the syndicate myself?**
- A. As an employee of UnitedHealth Group, you have the obligation to first alert the organization to any business opportunities that arise in connection with enterprise activities. Contact your manager or business Legal Representative or Compliance Officer to determine whether this is an opportunity that must be presented to the Company before you pursue it individually.
- Q. One of my work assignments includes a contract with the U.S. federal government for which UnitedHealth Group is paid on a cost basis. My manager told me to bill 75 percent of my time to the government contract—but I only spend 25 percent of my time working on that contract. What should I do?**
- A. Immediately contact your business Legal Representative or Compliance Officer or the Compliance & Ethics HelpCenter. Accurate time accounting for all work is essential, including for government cost contracts, and failure to maintain accurate time accounting could result in serious fines and penalties for UnitedHealth Group — and perhaps exclusion from future business with the government client.
- Q. I'm not involved in the Company's financial disclosure process. Am I responsible if the Company fails to report information accurately because of financial information I record?**
- A. Yes. Although Senior Financial Officers must sign off on our Company's financial reports, the information you record can affect our financial reports. Always be certain every transaction you record is accurate.
- Q. Giving gifts to business partners at certain times of the year is a common and culturally accepted practice in our country. Some of the people we work with are government officials. If we do not participate in this practice, our behavior will be considered rude and it might negatively affect our business and reputation. Can I give gifts to business partners and government officials?**
- A. As an international company, we recognize that it is customary in certain cultures to give gifts to business partners on certain occasions, such as Christmas, Diwali, and to mark the New Year. Consistent with and subject to the limits and required approvals, specified in both UnitedHealth Group's Gifts and Entertainment and Anti-Corruption policies, you may give gifts to business partners with whom you have a business relationship as long as the values of these gifts are not excessive, are consistent with policy, and each gift is reported in the appropriate general ledger account. All gifts to government officials, government employees, and U.S. union officials must be approved by UnitedHealth Group Compliance & Ethics prior to giving or promising the gift.



## Questions or Concerns Relating to this Section of the Code?

### Contact:

#### Resources

- Your **Manager**
- Your business **Legal Representative or Compliance Officer**
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](http://uhghelpcenter.ethicspoint.com)
- UnitedHealth Group **Compliance & Ethics**  
**Phone:** (952) 936-7463  
**Online:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)
- **International Compliance** [InternationalCompliance@uhg.com](mailto:InternationalCompliance@uhg.com)
- Your business unit's **Interactions with Pharmaceutical, Medical Device or Biologic Manufacturers, Wholesalers or Distributors Policy Liaison**
- UnitedHealth Group **Sustainability Report**

#### Associated Policies

- |  |  |
|--|--|
| • <b>Anti-Corruption Policy</b>                        | • <b>Interactions with Pharmaceutical, Medical Device or Biologic Manufacturers, Wholesalers or Distributors</b> |
| • <b>Conflicts of Interest</b>                         | • <b>Insider Trading</b>   |
| • <b>Outside Directorships</b>                         | • <b>Travel &amp; Expense Management Policy</b>  |
| • <b>Related-Person Transactions Approval</b>          | • <b>U.S. Federal Government Contracting Policy</b>  |
| • <b>Gifts and Entertainment (Business Courtesies)</b> | • <b>Anti-Kickback Policy</b>  |
| • <b>UnitedHealth Group Commitment to Human Rights</b> | • <b>False Claims Act Compliance Policy</b>  |





Code of Conduct

# ACCOUNTABILITY

At UnitedHealth Group,  
we are each personally  
responsible for our actions.

## Our Commitments

We are accountable for complying with all applicable laws, regulations, and contractual obligations, with this Code of Conduct, and with the Company's policies, and procedures. When we are accountable, we earn the trust that our members, patients, providers, and other business partners place in us.

We share the responsibility for preventing fraud, waste, and abuse in the health care system. UnitedHealth Group has established processes for identifying, reducing, and combating fraud, waste, and abuse.

Prompt reporting of suspected Code or policy violations and potentially illegal or unethical conduct to an appropriate Company representative requires the courage to acknowledge our mistakes, and enables us to do whatever is needed to address them.

**Failing to report suspected violations or to cooperate with the investigation is itself a violation of Company policy and can lead to discipline up to and including termination of employment.**

If you have any concerns about reporting a potential violation to your manager, or if you have already done so but you believe the matter has not been addressed, contact your business Compliance Officer or the Compliance & Ethics HelpCenter. Managers who receive such reports are required to take immediate action, and involve Legal, Compliance, or Human Capital representatives, as appropriate.

UnitedHealth Group will take all reasonable precautions to maintain the confidentiality of those who report an ethics or compliance concern to the extent allowed by Company policy and the law. **Intimidation and retaliation in any form is prohibited against an individual who, in good faith, reports a suspected violation of this Code, Company policies, the law, or contractual obligations.** You should immediately report any suspected retaliation to HRdirect or the Compliance & Ethics HelpCenter. Making malicious or purposely false reports also violates Company policy and will result in disciplinary action up to and including termination of employment.

## Be Accountable

- **Hold yourself accountable for your decisions and actions.**

We must each take responsibility for preserving and enhancing UnitedHealth Group's mission and goals. When we see potential violations of law, regulations, this Code, Company policies, contracts, or standards of conduct, we must report them.

- **Cooperate with all investigations, lawsuits, and other Company legal matters.**

You are expected to support the investigation of potential violations of this Code and other Company legal matters, including investigations and lawsuits. This includes providing timely, accurate, truthful, and complete information and documentation.

## Accountability Challenges

**Q. I am working on a project team, and I disagree with the Project Manager's interpretation of a legal requirement. She told me that it's not my role to raise these issues. What should I do?**

A. If you are unable to resolve the issue through conversations with the Project Manager, and you believe in good faith that she is acting on an incorrect interpretation of a legal requirement, you should contact your manager or your business Legal Representative or Compliance Officer for assistance. You may also contact the Compliance & Ethics HelpCenter.

**Q. I believe my manager may be involved in misconduct, and I don't know where I should go to report the issue. Whom should I talk to, and will I get in trouble if I'm wrong?**

A. If you believe in good faith that your manager is engaging in misconduct, you have an obligation to report your manager's activity. Contact the Compliance & Ethics HelpCenter. To the extent allowed by Company policy and the law, your name will remain confidential at your request. You also may report anonymously, where permitted by law. If your report is made in good faith, you will not be disciplined even if you are wrong about your manager's activities. The Company has a strict non-retaliation policy that protects you from any adverse employment actions as a result of your good faith report.

**Q. I think my co-worker is violating a provision of the Code of Conduct and Company policy, but I don't want to get her in trouble.**

A. Your wish to protect your colleague is understandable, but you have an obligation to report all potential violations of Company policy to an appropriate person or resource. If you believe your colleague has violated a policy, this Code of Conduct, or any law or regulation, you should contact your manager or the Compliance & Ethics HelpCenter immediately.







## Questions or Concerns Relating to this Section of the Code?

### Contact:



#### Resources

- Your business **Legal Representative or Compliance Officer**
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](https://uhghelpcenter.ethicspoint.com)
- **Compliance & Ethics** (952) 936-7463 or [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)



#### Associated Policies

- **Reporting Misconduct**
- **Non-Retaliation Policy**



Code of Conduct

# FAIR COMPETITION AND FAIR DEALING

UnitedHealth Group's  
success is founded on  
honest competition.

## Our Commitments

We seek competitive advantages only through legal and ethical business practices. We succeed by outperforming our competitors honestly and fairly.

Many laws and regulations define and promote fair business practices to protect the competitive environment. For example, competition laws, known in the U.S. as antitrust laws, protect against practices that interfere with free competition. They are designed to promote a competitive economy in which each business enterprise has an opportunity to compete fairly on the basis of price, quality, and service, and in the employment marketplace. To comply with these laws, each employee, director, and contractor must deal fairly with the Company's customers, service providers, suppliers, competitors, and employees. No employee or director should take advantage of anyone through unfair-dealing practices.

### Comply with Fair Competition Laws and Company Policies

- **Avoid discussions with competitors that may appear to restrain competition unreasonably.**

Communications or agreements with competitors regarding rates, prices, sales territories, provider reimbursement rates, employee salaries, or other terms of compensation, benefits, and other topics related to UnitedHealth Group's businesses may violate applicable competition laws, resulting in severe penalties against the Company and, potentially, you. Although there may be legitimate business reasons to communicate with a competitor (for example, sometimes competitors are also customers, and we frequently interact with competitors at industry association meetings, educational industry seminars, or conferences that cover issues common to the whole industry), you should always make sure that your discussions in these contexts do not cross into the areas of prohibited subjects or activities. Consult your manager and the Legal Representative assigned to your business to understand the limits that may apply to these conversations in the context of the business you support.

- **Exercise caution at industry seminars and conferences.**

Attending seminars and conferences with others in our industry is common. Always be cautious when discussing business matters with competitors.

- **Exercise caution when participating in collaborative projects, benchmarking surveys, and information exchanges involving competitors, even when such projects appear to serve the public interest.**

Consider whether a trade group, association, or other third party can play a role in managing the exchange of information and/or facilitating interactions with competitors in furtherance of the collaborative effort. Be aware of Export Control requirements prior to sharing technical information about our products, services, or equipment with colleagues outside the U.S.

- **Ask questions first.**

If you are unsure about whether an exchange of information or a communication in a particular situation would be appropriate, consult the Legal Representative assigned to your business.



## Challenges to Competing Fairly

- Q. While attending a seminar, I sat next to an employee of a UnitedHealth Group competitor. She started telling me about certain confidential projects that she is working on. What should I do with this information?**
- A. You should immediately report it to a member of the Legal Department assigned to your business without sharing the information with anyone else at UnitedHealth Group. Do not discuss or share sensitive competitive information (for example, information relating to pricing or market share) with representatives of other companies or industry and trade associations.
- Q. Two days ago, a representative of a competitor called me to discuss dividing certain sales territories to maximize revenues for my business and her employer. Does this activity raise any concerns?**
- A. This suggestion is likely a violation of the competition laws. Conversations like this should be avoided and reported to your business Legal Representative immediately.
- Q. I work in OptumHealth and received a request from a colleague on my old team at UnitedHealthcare for some information related to reimbursement rates of other payers. May I provide the data since we are part of the same company?**
- A. Not without consulting your business Legal Representative or Compliance Officer. OptumHealth's provider businesses contract with competitors of UnitedHealthcare and may receive competitively-sensitive information, which must be protected, and sharing the data requested without review and approval by legal counsel could be a form of unfair competition. In certain situations, third party information may be shared between segments but there are critical facts necessary to make that legal determination.
- Q. The business unit in which I work serves as a vendor for a number of health care companies. I recently received an inquiry about our services from a UnitedHealth Group competitor. Can I return the call?**
- A. There may be legitimate business reasons to communicate with a competitor, including when that competitor is also a customer for our products or services. However, if the inquiry is seeking information that is competitively sensitive, you should consult your manager or business Legal or Compliance Representative before responding.
- Q. I have a great idea for a public awareness campaign involving a particular health issue. Can I reach out to contacts at a few of our competitors to put together a collaborative project?**
- A. Such activities may be permissible, but collaboration with competitors carries significant risk. Consult with your Legal Department first or consider involving a trade association as a facilitator.
- Q. Recently I was copied on an email in which a colleague referenced that we have an agreement with a competitor not to recruit that company's employees. Is this a problem?**
- A. It might be. "No-poaching" agreements with competitors may raise issues under antitrust laws. You should report the issue to your business Legal Representative.





## Questions or Concerns Relating to this Section of the Code?

### Contact:

#### Resources

- Your business **Legal Representative or Compliance Officer**
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](https://uhghelpcenter.ethicspoint.com)
- **Compliance & Ethics** (952) 936-7463 or [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)

#### Associated Policies

- **Antitrust Policy**
- **U.S. Federal Government Contracting Policy/Organizational Conflicts of Interest Guidance**
- **Anti-Kickback Policy**

# PRIVACY AND INFORMATION SECURITY

Maintaining the privacy and security of personal information that we collect, use, or that is entrusted to our care is an essential component of UnitedHealth Group's mission and its commitment to integrity and ethical behavior.



## Our Commitments

Managing an individual's personal information respectfully, responsibly, and in accordance with all applicable laws builds trust individual-by-individual, serves our business objectives, and fosters enduring relationships with our stakeholders.

### Protect Personal Information

#### **Protecting personal information is critical to our enterprise:**

- Personal information is a broad term that may include national identification numbers (such as Social Security numbers), dates of birth, financial and medical information, and other information that identifies or relates to a particular individual.
- UnitedHealth Group receives personal information from or about individuals (such as health plan members, patients, customers, employees, or other persons whose information is provided to or received by UnitedHealth Group or its business partners) as part of our day-to-day business activities.
- We are trusted and required to safeguard personal information reasonably and appropriately and to use or disclose such information only as authorized by the individual or in compliance with all applicable laws.

### Protect Privacy, Ensure Security

- **Understand the rules regarding handling personal information, including restrictions on transferring or accessing personal data from individuals who reside in another country.**

Recognize that part of your day-to-day responsibilities may include access to and use of someone's personal information and that the use or disclosure of such information is governed by laws, regulations, customer contracts, and Company policies. If you are unsure how to handle such information appropriately, ask one of the Resources listed in this section.

- **Fulfill the obligations of your job.**

When accessing or using personal information in your job, take care of it! Only use information that is required for your job, and only use the minimum amount of information necessary. If you transfer to a new job within the Company, remove any personal information or access that you no longer need for the new job. You also have an obligation to report the inappropriate access, use, or disclosure of personal information. Report such activity to the business Privacy team lead, the UnitedHealth Group Privacy Office, or to the Compliance & Ethics HelpCenter right away.

- **Keep it private; keep it secure.**

Always ensure that you are accessing, storing, or disclosing personal information only as necessary for your job and only to the extent required for business purposes, and that you are doing so in a secure manner appropriate to the sensitivity of the information and applicable law or policies.

## Privacy and Information Security Challenges

**Q. I accidentally emailed an Explanation of Benefits (EOB) that contained personal information to the wrong person outside the Company. The recipient told me that she had deleted it. I also forgot to send the email via encryption (i.e., I did not use the “Secure Delivery” option). The EOB only contained information about a single individual. Do I still need to report this as an incident?**

**A.** Yes. Even if the incident only affects a single individual, always report the incident to enable the Company to comply with any legal or other obligations. Always remember to comply with security policies, such as those regarding encryption, that help minimize the risk to the data if an incident occurs. Contact any of the Resources listed in this section for assistance.

**Q. I plan to travel for work and do not want to bring my work-issued laptop. Can I email some of my work documents to my personal email account so that I can access it from my personal device or a guest computer at my hotel?**

**A.** No. Company policy strictly prohibits using personal email to conduct Company business, as such email accounts are unlikely to be as secure as required by Company policy.

**Q. Part of my job requires me to process medical claims. My sister asked me to provide her with copies of her Explanation of Benefits (EOBs) for the last six months. Can I do this?**

**A.** No. Although she gave you permission, you are only authorized to access information as part of your job. Your sister must contact the Company and request the records through the regular business process. Additionally, as part of your job, you should never handle or be involved in matters related to information about you, your family, or friends. If you receive any such work, ask your manager to reassign it.

**Q. I mistakenly handed the wrong discharge summary to a patient who then left the clinic. What should I do?**

**A.** Providing personal information intended for one patient to another patient in error could compromise the intended-recipient patient’s privacy. Report the incident

to one of the Resources listed in this section. Always remember to comply with privacy policies and take care to double check that the correct personal information is handed to patients.

**Q. I was assigned the task of comparing two lists of members’ claims. A colleague told me about a web resource that could accomplish this task. Can I use public internet sites that help me to do my job?**

**A.** No. The use of public internet sites for handling personal and confidential business information is not permitted by Company policy and could lead to the compromise of sensitive information. The Company has technology that can be requested through your manager, which will accomplish such tasks in an efficient manner while keeping information properly protected.

**Q. A project of mine involves reviewing member information of individuals who live in the European Union. Is that an issue?**

**A.** It may be. European Union data protection laws are rigorous, and you should check with your segment privacy office before beginning the review to identify issues relating to inter-country data access or transfer.

**Q. While working from home, I left my desk for a few minutes to answer the door. Because it was a quick absence, I did not lock my computer. My screen may have been visible to members of my household. Is this acceptable?**

**A.** No. The unlocked computer is a risk to information privacy and security. An unattended computer should always be locked and secured, even if unattended for a short period. Device screens should not be visible to any unauthorized individual.

**Q. I took a selfie and posted it to social media. In the background of my photo, a paper is visible on my countertop. The paper only displays the first few lines of a provider contract, and one would have to zoom in on the photo to really read the information. Is this okay?**

**A.** No. Protected, confidential, business, or otherwise private information should never be posted on social media or other public sites.



## Questions or Concerns Relating to this Section of the Code?

### Contact:



### Resources

- Your business **Privacy Team**
- Your **Manager**
- Your business **Legal Representative or Compliance Officer**
- The **UnitedHealth Group Privacy Office** (UHG\_Privacy\_Office@uhg.com)  
The appropriate business Privacy Office (Report Optum issues to Privacy@optum.com; Report UHC issues to UHC\_Privacy\_Office@uhc.com)
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](http://uhghelpcenter.ethicspoint.com)
- **Compliance & Ethics** (952) 936-7463 or EthicsOffice@uhg.com
- All incidents that compromise information security safeguards or policies must be reported to the IT Help Desk at (888) 848-3375 (U.S. & Canada), or find your country's dialing information on the "Informational – How to Contact the Help Desk" section on the United Help Desk intranet site.  
Online at: <http://helpdesk.uhg.com>



### Associated Policies

- **UnitedHealth Group Personal Information Privacy and Data Protection Policy**
- **Enterprise Information Security Policies**
- **Enterprise Incident Management Reporting and Response Policy**
- **UnitedHealth Group Privacy Policy Manual (HIPAA)**
- **UnitedHealth Group Social Media Handbook**
- **Limits on Accessing, Using and Disclosing UnitedHealth Group Employee Benefit Plan Data**



# OUR ASSETS AND THE ENVIRONMENT

Stewardship is the careful and responsible management of something entrusted to your care. As UnitedHealth Group employees, we are entrusted with the Company's assets, including equipment, supplies, data, financial information, confidential company information, and intellectual property.



## Our Commitments

The Company's assets are critical to UnitedHealth Group's continued success, and each employee must ensure that the assets used in his or her role are protected from misuse, loss, improper disclosure, and destruction. UnitedHealth Group is also committed to stewardship of a critical asset we all share – the environment. We encourage employees to conserve natural resources, and implement green strategies and environmentally conscious practices in the workplace.

### Be a Steward of our Assets and the Environment

- **Limit use of UnitedHealth Group assets or resources for personal reasons.**

Although you may use certain assets, such as UnitedHealth Group's communications systems, for limited personal use, UnitedHealth Group's assets are intended to be used for business purposes that benefit the Company.

- **Protect UnitedHealth Group's intellectual property and confidential information.**

Intellectual property and confidential business information are among the Company's most valuable assets. Intellectual property includes concepts protectable by patent, copyright, or trademark and trade secrets like proprietary processes, methods, software, and algorithms, to name a few. Examples of confidential information include provider reimbursement rates to business partners and business strategies. All employees are responsible for safeguarding the intellectual property and confidential information in their possession or that they have access to. Be aware of use restrictions, intellectual property and confidential information should not be shared or used with external applications or on websites without proper approvals.

- **Limit the use of UnitedHealth Group names and brands, such as trademarks and logos only to those that advance the Company's interests and be vigilant for signs of misuse.**

The brand identity and trademarks of UnitedHealth Group and its businesses and subsidiaries are visual representatives of our reputation. We must ensure that they are not used without permission.

- **Maintain business and administrative records in accordance with UnitedHealth Group's Records Retention Schedules.**

Documents you create and handle must be created, retained, and deleted according to the processes defined in Company policy.

- **Strive to act in an environmentally responsible manner in your UnitedHealth Group role and in our communities.**

Help raise awareness of the sustainability and green practices in place at UnitedHealth Group and periodically evaluate our implementation of those practices.

## Stewardship Challenges

**Q. May I download for personal use music, new movies, or other programs onto my work computer? What about sending a personal email from my work account?**

A. No. All communication systems (including phones, email, voicemail, internet access, and Company-owned iPads) belong to UnitedHealth Group, and you must use them primarily for business purposes. While employees are allowed limited personal use of UnitedHealth Group's communication systems, you may not use Company communication channels to send chain letters, personal broadcast messages, copyrighted documents not approved for reproduction, or to open incorrectly addressed mail, or to access or send inappropriate material. Use of electronic non-Company-approved instant messaging and downloading, storing and/or transmitting non-business-related multimedia using UnitedHealth Group communications systems is prohibited.

**Q. A company that had unsuccessfully approached a UnitedHealth Group business about partnering on a product began using UnitedHealth Group's branding in its marketing materials without permission. What should I do?**

A. UnitedHealth Group does not allow the use of its logos or brands without prior business approval and appropriate legal documentation. If you learn that a company is inappropriately using a UnitedHealth Group brand, notify the UnitedHealth Group IP Legal Department immediately. All questions about the appropriate use of our corporate trademarks should be directed to the UnitedHealth Group IP Legal Department.

**Q. One of my direct reports told me that he stores business records relating to projects he manages in his personal email and file cabinets. He periodically reviews these records and deletes any items older than one year, regardless of the nature of the communication. Should he be doing that?**

A. No. Business records, in both paper and electronic form, serve as evidence of important business decisions and should be stored in a place accessible to others in the Company who may need them. Laws, regulations, and/or internal policies often govern the length of time that certain documents should be archived. The Records Retention Schedules describe what should be retained and what may be deleted. For additional guidance, you should contact the Enterprise Records and Information Management ("ERIM") Department and your business Legal Representative. All business-related records and communications on your personal devices are subject to review if necessary for an internal investigation.

**Q. One of our customers is auditing us and has asked for copies of all of the contracts with the vendors we have engaged in order to provide services to this customer. Can I give the customer copies of those contracts?**

A. Some contracts contain confidentiality restrictions that do not allow UnitedHealth Group to disclose information about the contract. Consult your business Legal Representative or Compliance Officer for assistance.





## Questions or Concerns Relating to this Section of the Code?

### Contact:



### Resources

- Your business **Legal Representative or Compliance Officer**
- The **Enterprise Records and Information Management Department**  
ERIM@uhg.com
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](https://uhghelpcenter.ethicspoint.com)
- **UnitedHealth Group Compliance & Ethics** (952) 936-7463 or  
[EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)



### Associated Policies

- **Corporate Environmental Policy**
- **Email Retention Policy (U.S.)**
- **Endorsements and Use of Company Names**
- **Enterprise Records and Information Management (ERIM)**
- **Internet and Telephones Policy**
- **Software Compliance**
- **Master Intellectual Property Policy – Concerning Patents, Trade Secrets, Copyrights, Trademarks, Domain Names, and Social Media**



The background of the page is a deep blue monochromatic photograph of classical architectural columns. The columns are fluted and have papyrus capitals, receding into the distance to create a strong sense of perspective. The lighting is dramatic, with highlights on the edges of the columns and deep shadows in the recesses.

## Code of Conduct

# GOVERNMENT INTERACTIONS

UnitedHealth Group engages with government agencies and officials in the countries in which we operate — as our legislators, regulators, and customers — and our business dealings with international, national, state, and local governments are very closely scrutinized.



## Our Commitments

All levels of government have enacted laws that define interactions with government officials and prohibit improper influence by private business in the government arena. Our compliance with these laws and regulations is crucial to upholding UnitedHealth Group's core values, advancing our mission, maintaining UnitedHealth Group's relationships in the public sector, and demonstrating that we are worthy of the public's trust.

In our interactions and work with government officials and government employees, including those employed by government-owned businesses, such as state-owned hospitals, we must always bear in mind that:

- Successfully obtaining government business can be complex. It can require navigating a wide range of laws and restrictions that vary with the government agency involved, the type of service provided, and the method of procurement.
- Government contractors are often legally required to comply with special contract provisions, including reporting to the contracting agency in a timely manner certain violations of law, policies, or the contract, and cooperating with government audits and investigations.
- Contacting government officials, even in connection with a procurement, can be treated as lobbying, and individuals who engage with government officials may be required to register as lobbyists.
- Government employees frequently are subject to restrictions on their ability to seek employment with private companies, particularly in those businesses regulated by the job-seeker's agency.
- UnitedHealth Group's Anti-Corruption Policy and anti-bribery laws, such as the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act, and Brazil's Clean Company Act, prohibit UnitedHealth Group and all of its businesses, employees, independent contractors, and business partners (vendors, consultants, brokers, etc.) from giving bribes to government officials. A bribe is anything of value, including favors, gifts, meals, entertainment, and political contributions, which may be used to obtain or retain a business advantage. Company policy also requires that UnitedHealth Group conduct due diligence on our business partners and include anti-corruption provisions in all agreements. Note that local laws related to bribery may impose more stringent requirements on businesses that are based outside the U.S.
- Your personal political activity may, in certain places, be attributed to UnitedHealth Group and could adversely affect the Company's ability to do business within those jurisdictions. The Company complies with all applicable jurisdictional laws and regulation regarding personal political activity.
- If you are unsure about the requirements for appropriate interaction with government officials, or if you need further guidance about regulations on our business in jurisdictions outside of the U.S., contact UnitedHealth Group Compliance & Ethics, the International Compliance team, or your business Legal Representative or Compliance Officer for assistance. Remember that when operating across borders, regular business practices, like sharing technical information about our products, services, or equipment with colleagues can potentially trigger Economic Sanctions and Export Control requirements, and should be reviewed in advance with these resources.

## Ensure Appropriate Interactions with Government Officials

- **Involve your business Legal Representative or Compliance Officer in the government procurement process.**

The highly-specialized and technical requirements of procuring government business require special expertise to ensure successful pursuit of a government contract.

- **Understand and comply with all government contract requirements.**

Consult with your business Legal Representative or Compliance Officer if you work on government procurement contracts to make sure you understand your obligations under the procurement or contract. Failure to comply with government procurement or contract requirements can result in fines, penalties, and loss of business.

- **Follow local jurisdictions' rules on interactions with government officials.**

If you contact government officials to obtain or retain business, you may need to register as a lobbyist or follow other requirements. Failing to register can lead to a ban on business, as well as other civil or even criminal penalties. Consult your business Legal Representative or Compliance Officer to ensure that you are aware of applicable anti-corruption requirements.

- **Review UnitedHealth Group's policies on political contributions and advocacy.**

You must obtain approval from UnitedHealth Group External Affairs and the UnitedHealth Group Corporate Legal Department before engaging in political advocacy activity on the Company's behalf or making political contributions using Company funds.

- **Understand the impact of your personal political activity on UnitedHealth Group's business.**

Do not use Company property for personal political activities as this may violate applicable campaign finance laws, anti-bribery laws, and UnitedHealth Group policy.

- **Ensure the accuracy and truthfulness of all public statements, claims, and other related documents presented to the government, our members, patients, customers, and counterparts.**

When processing claims related to government contracts, ensure that our documentation is accurate, complete, and made in accordance with government guidelines.





## Government Interaction Challenges

- Q. My team has hired an outside consultant to help us prepare a bid on a yet-to-be-released government contract. The consultant suggested that we take government officials out to dinner to discuss potential terms of the contract. Should we follow his advice?**
- A. Many jurisdictions restrict the ability of public officials to accept gifts from private parties, particularly when the donor is seeking business or is already doing business with a government agency. Notify your manager and contact UnitedHealth Group Compliance & Ethics for legal guidance.
- Q. I was invited to lunch next week by an employee of my state's insurance commission whom I've dealt with several times in connection with regulatory inquiries. He said he wanted to talk about potential openings at UnitedHealth Group. May I attend the lunch?**
- A. Discussing job opportunities with an official who may be able to influence actions affecting UnitedHealth Group may be limited by law or regulation. Consult with your manager and your business Human Capital Partner about the inquiry before responding to the invitation. You may also contact UnitedHealth Group Compliance & Ethics for additional guidance.
- Q. I've been asked to serve as a fundraiser for my friend's campaign for mayor in a city that has adopted a pay-to-play law. What should I do?**
- A. Pay-to-play laws typically limit political contributions by employees of companies that do business with the government. Depending on your role in the business and the Company's business relationship with the city, this activity may trigger the pay-to-play law's ban on business. You should contact UnitedHealth Group Compliance & Ethics for guidance.
- Q. I work in claims processing for government programs beneficiaries, and I have received several Medicare claims from a particular provider that have suspicious discrepancies in the information provided for the same patient. Should I tell someone?**
- A. Yes. If you know or suspect that inaccurate claims are being submitted, you are required to report it to your manager or to your business Legal Representative or Compliance Officer. You may also make a report to the Health Care Fraud Tip Line (866) 242-7727 of any potentially fraudulent activity or follow your business's fraud-reporting procedure.
- Q. I'm working on a new project in an emerging-market country. A public official responsible for our licensing told me that we're required to pay a substantial processing fee to his relative's firm for prompt review of my business's application. Can I pay the fee?**
- A. No. This type of payment may be illegal under anti-bribery laws. You should report the request to your business Legal Representative.
- Q. A government inspector told me that I can avoid delays to a construction project at a clinic and secure the necessary licenses and permits if I give a charitable donation to a local orphanage. Can I make a donation on behalf of the Company to get the permits needed? If not, can I have our engineering firm make the donations instead?**
- A. While the Company supports the communities in which we do business in many ways, we cannot give anything of value in exchange for a favor from a government official. Additionally, you cannot have a third party, such as an engineering firm in this case, give a donation or make a payment that you could not otherwise make. Such a payment by a third party is attributable to our business, and we must make sure that all independent contractors that work on our behalf understand our strict policy against the payment of bribes. The Company prohibits facilitation payments.





## Questions or Concerns Relating to this Section of the Code?

### Contact:



### Resources

- Your business **Legal Representative or Compliance Officer**
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](https://uhghelpcenter.ethicspoint.com)
- **UnitedHealth Group Compliance & Ethics** (952) 936-7463 or [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)
- **International Compliance** [InternationalCompliance@uhg.com](mailto:InternationalCompliance@uhg.com)
- The **Health Care Fraud Tip Line** (866) 242-7727 or report online using the Report Health Care Fraud portal at [https://tipform-ui.optum.com/report\\_fraud.html](https://tipform-ui.optum.com/report_fraud.html).



### Associated Policies

- **U.S. Federal Government Contracting Policy**
- **Employment of Government Employees**
- **Gifts and Entertainment (Business Courtesies) Policy**
- **Anti-Corruption Policy**
- **Political Contributions Policy**
- **Employee Political Activity and Political Contributions**
- **False Claims Act Compliance Policy**
- **Economic Sanctions and Sanctions Monitoring Policy**



## Code of Conduct

# COMMUNICATIONS AND MARKETING

UnitedHealth Group's reputation comes, in part, from the relationships it maintains with the public, the press, analysts, and all who interact with our Company.

## Our Commitments

We must present information in a clear, truthful, and professional manner. Our business environment is incredibly dynamic, and our communications should positively reflect our commitment to make health care work for everyone.

Because we work for a publicly-traded company, we must be aware of the securities laws requirements concerning public disclosure of Company information. In short, you may not discuss any non-public information including material information, financial information and reports, executive personnel changes, lawsuits or regulatory actions, and mergers or acquisitions outside of the Company unless you have received specific approval from the UnitedHealth Group Chief Legal Officer or Investor Relations, or are otherwise required to disclose such information.

Moreover, social media has become an increasingly important communication tool, but it also presents an arena for potential communications pitfalls. Employees who publish or post content on blogs, social-networking sites, wikis, and other user-generated media on the internet (such as Facebook, Google, LinkedIn, Yahoo/Groups, YouTube, Twitter, Wikipedia, Pinterest, chat rooms, message boards, etc.) should exercise good judgment and follow the Social Media at UnitedHealth Group Guidelines. The Guidelines apply both to the use of social media as part of your work on behalf of UnitedHealth Group and to your social media activity outside of the Company.

We are committed to ethical marketing based upon transparency and honesty. We strive to ensure accuracy in our marketing and communications in support of our values and high standards of personal and institutional integrity.

### Communicate Effectively and Appropriately

- **Refer members of the media to Media Relations.**

A referral to Media Relations will ensure that the person or organization seeking information talks to a subject-matter expert and receives the most current information. All news releases for distribution to local, regional, or trade media must be reviewed and approved by the appropriate business leader, the Communications Department, subject-matter experts, and assigned legal counsel before they are released.

- **Do not act as a Company spokesperson unless you have coordinated with the Communications Department.**

Employees who are experts in a certain area or who are Company leaders may be asked to act as a media spokesperson. The appropriate staff will select and train employees for this role. All questions or requests from the media must be directed to Media Relations, and all spokespersons must coordinate their media contacts with their assigned communications staff. In the event of a Company-related crisis, UnitedHealth Group's Chief Communications Officer and media relations representatives from its businesses are authorized to talk with the media.

- **Only designated spokespersons may communicate on behalf of the Company with investors and analysts.**

It is important that only those employees who have the required specialized knowledge speak to securities professionals, such as analysts, investors, broker dealers, investment advisors, and investment companies, on behalf of UnitedHealth Group, and all questions or requests from securities professionals must be directed to Investor Relations. This includes questions from analysts or others inquiring about our vendor or other business relationships.

- **If you are asked to speak at a conference, do not speak on behalf of the Company unless you are authorized to do so by a senior member of your business unit.**

Be careful to distinguish your own personal opinions from the Company's views.

## Communication Challenges

- Q. I was contacted by a member of the media to get my opinion on the health care industry. What should I do?**
- A. If you are contacted by a member of the media seeking information about any issue relating in any way to UnitedHealth Group, refer the person to Media Relations without making a statement.
- Q. A member of the media contacted me regarding information I shared via social media. What should I do?**
- A. Reporters and journalists are increasingly turning to social media as sources for their news stories. Be aware that what you share may become the subject of media coverage. Always follow Social Media at UnitedHealth Group Guidelines when sharing information online. If you are asked about the Company's position or view, refrain from commenting and direct the reporter or journalist to contact Media Relations.
- Q. I met a health care industry analyst at a conference, and she asked if I know anything about the Company's business prospects. Should I tell her?**
- A. Unless you are authorized to speak to investors or analysts, you must refer the analyst asking the question to our Investor Relations department.
- Q. A family friend writes for a blog and, because of my job at UnitedHealth Group, has asked for my opinion on health care reform. What should I tell him?**
- A. Conveying a personal opinion to friends and family is entirely appropriate. However, if you believe that your opinion might in any way be attributed to the Company, you should refrain from commenting and/or refer the person to Media Relations.







## Questions or Concerns Relating to this Section of the Code?

### Contact:



#### Resources

- Your business **Legal Representative or Compliance Officer**
- **Corporate Communications** (877) 636-9718  
or UHGMediaRelations\_DL@ds.uhc.com
- **Investor Relations** (952) 936-7214
- **UnitedHealth Group Compliance & Ethics** (952) 936-7463 or  
EthicsOffice@uhg.com
- **UnitedHealth Group Ethical Marketing Statement**



#### Associated Policies

- **Provision of Information to the Investment Community and Media**
- **Crisis Communications**
- **Social Media Policy and Guidelines**
- **UnitedHealth Group Commitment to Ethical Marketing**



## Code of Conduct

# A SAFE AND SUPPORTIVE WORKING ENVIRONMENT

UnitedHealth Group strives to provide a safe and supportive working environment for all employees.



## Our Commitments

UnitedHealth Group is dedicated to creating an inclusive environment, free of bias or discrimination, for everyone, regardless of age, race, gender, color, religion, national origin, ancestry, disability, marital status, protected veteran status, sexual orientation, gender identity and/or expression, genetic information, status with respect to public assistance, or any other characteristic protected by state, federal, or local law.

United by our values and our mission, our working environment should promote respect and appreciation for our differences and acknowledge the value of diversity to our organization.

In keeping with our mission and our values, we respect the human rights of all those whom we employ or interact with across our businesses.

UnitedHealth Group will not tolerate behavior that endangers its employees, members, patients, customers, or business partners, or subjects them to discrimination, harassment, or threats.

We will provide an environment free from acts or threats of violence, inappropriate conduct, and from illegal drugs and alcohol misuse. We do not intimidate or retaliate against individuals who make good-faith complaints or reports of discrimination, harassment, violence, or threats, or any other violation of this Code or Company policy, or who provide information related to any such complaint or report.

The Company will balance employee privacy with the need to maintain a safe and efficient work environment.

### Promote a Safe and Supportive Working Environment

- **Report to Corporate Security all threats, attempted violence, or actual violence against employees, customers, or third parties that is connected to the UnitedHealth Group workplace.**  
UnitedHealth Group will not tolerate violence or threats of violence in any form in the workplace, at work-related functions, or outside of work if it affects the workplace. Unauthorized persons or theft of personal belongings or Company property should also be reported to Corporate Security. Weapons are not allowed on UnitedHealth Group property except as may be provided for in the Violence-Free Workplace Policy. In emergency situations – or if you perceive a threat to be imminent – call the police, fire, or medical emergency services (911 in the United States) for assistance.
- **If you are under the influence of any intoxicant, you may not work or be present on Company sites, in Company vehicles or acting on the Company's behalf.**  
While working on behalf of the Company, employees must not use any substance that could prevent them from working safely or effectively, including prescription medications. Employees may, however, consume alcohol at authorized UnitedHealth Group functions or in certain legitimate business settings, such as client entertainment. At all times, however, employees are expected to act responsibly and to consume alcohol only in moderation.
- **Immediately report to HRdirect accidents, injuries, or unsafe practices occurring on UnitedHealth Group's grounds.**  
Every employee is obligated to promptly report any incident that compromises the safety of UnitedHealth Group's workplace.
- **Notify HRdirect, your manager, a Human Capital employee or the Compliance & Ethics HelpCenter if you experience or witness discriminatory conduct or harassment in your workplace, intimidation, or retaliation for reporting potential ethics violations, discrimination, or harassment.**  
UnitedHealth Group does not permit discrimination or harassment on the basis of age, race, gender, color, religion, national origin, ancestry, disability, marital status, protected veteran status, sexual orientation, gender identity and/or expression, genetic information, status with respect to public assistance, or any other characteristic protected by state, federal, or local law. Similarly, UnitedHealth Group prohibits any intimidation or retaliation against individuals who make good-faith complaints or reports of discrimination, harassment, violence, or threats, or any other violation of this Code or Company policy.



## Work Environment Challenges

**Q. During a working lunch at a nearby restaurant, two of my colleagues consumed several cocktails and returned to work intoxicated. Is this allowed?**

A. No. UnitedHealth Group is committed to providing a workplace free of illegal drugs and alcohol or drug misuse. Employees may not report for work or be on Company premises if they are under the influence of alcohol or illegal drugs. In this example, employees would be required to report the intoxicated colleagues to HRdirect.

**Q. My co-worker told me that her spouse has threatened to harm her while she is at work. What should I do?**

A. Report it to Corporate Security immediately. It is UnitedHealth Group's policy to provide a workplace that is safe and free from all threatening and intimidating conduct.

**Q. When managers in my group were discussing the decision to promote one of my direct reports, another manager made comments that inappropriately referenced the employee's gender in relation to her qualifications for the position. Should I report it?**

A. Yes. The Company will not tolerate discrimination on the basis of a person's gender in its hiring or promotion practices. Such conduct is prohibited in any form in the workplace, and should be reported to HRdirect, your manager, or the Compliance & Ethics HelpCenter.

**Q. I found out that my manager violated UnitedHealth Group policy, but I don't want to report it because I'm worried he will threaten or retaliate against me if he finds out. Do I have to report his actions?**

A. Yes. As a UnitedHealth Group employee, you are obligated to report any violations of Company policy of which you are aware. UnitedHealth Group has a strict non-retaliation policy. If an individual makes a good-faith complaint or reports harassment or other inappropriate behavior, or provides information related to such complaints or reports, he or she is protected from intimidation or retaliation. You can make an anonymous report, where permitted by law. If you experience or witness any behavior that you believe is prohibited intimidation or retaliation, you should report the activity to HRdirect or the Compliance & Ethics HelpCenter.





## Questions or Concerns Relating to this Section of the Code?

### Contact:

#### Resources

- Your **Manager**
- **HRdirect**  
**HRdirect (Internal)** <https://hub.uhg.com/sites/hub/Resources/Human-Capital-Help/Pages/default.aspx>  
**HRdirect (External)** <https://hub.unitedhealthgroup.com/sites/hub/Resources/Human-Capital-Help/Pages/default.aspx>  
**Phone:** (800) 561-0861 (U.S.), or find your country's dialing instructions via the intranet at the internal link above.
- **Corporate Security** Available 24 hours a day, 7 days a week.  
[corporatesecurity@uhg.com](mailto:corporatesecurity@uhg.com)  
**Phone:** (855) 936-8999 (toll free), or (952) 936-8999 (add +1 for international calls)
- The **Compliance & Ethics HelpCenter** Available 24 hours a day, 7 days a week. You can report anonymously, where permitted by law.  
**Phone:** (800) 455-4521 (U.S.) or find your country's dialing instructions on the HelpCenter portal.  
**Online:** [uhghelpcenter.ethicspoint.com](http://uhghelpcenter.ethicspoint.com)
- **Compliance & Ethics** (952) 936-7463 or [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)


#### Associated Policies

- Alcohol and Drugs in the Workplace
- Violence-Free Workplace
- Non-Discrimination Policy
- Sexual and Other Harassment
- Non-Retaliation Policy
- One Breath Policy
- Personal Information Handling Policy
- Equal Employment Opportunities
- UnitedHealth Group Commitment to Human Rights

## OUR SHARED RESPONSIBILITY

UnitedHealth Group's Code of Conduct and our shared values of integrity, compassion, relationships, innovation, and performance form the foundation of our commitments to the millions of people we are privileged to serve. They guide our efforts to achieve our mission and do our part in developing a modern, high-performing health system. The Code reminds us of our expectations of ourselves for ethical behavior as we interact with our colleagues, members, patients, providers, and partners in our communities across the globe, helping us navigate the challenges of the rapidly changing world in which we work.

Thank you for taking the time to understand this important document. I appreciate your dedication to the high standards reflected in our Code, and for the daily actions you take to live out those standards.

A handwritten signature in black ink, reading "Marianne D. Short". The signature is fluid and cursive, with the first name "Marianne" being more prominent than the last name "Short".

Marianne D. Short  
Executive Vice President & Chief Legal Officer  
UnitedHealth Group





# UNITEDHEALTH GROUP®

[www.unitedhealthgroup.com](http://www.unitedhealthgroup.com)

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