



## **Code of Conduct**

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Our Principles  
of Ethics  
& Integrity

## UnitedHealth Group Code of Conduct:

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## Code of Conduct

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# UnitedHealth Group and Integrity

The people of UnitedHealth Group and its subsidiaries around the world (“UnitedHealth Group” or “the Company”), as individuals and as a company, share five values that best describe how we aspire to conduct ourselves and our business: integrity, compassion, relationships, innovation, and performance. Together, these values describe the kind of behavior expected of us by the people we serve, that each of us must work toward every day.

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 everyone’s life, and each individual we touch must be able to trust in 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 for helping 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 will honor commitments. We will never compromise ethics. We will be known for living to the highest forms and standards of ethical behavior. We will make honest commitments and consistently honor those commitments.

## We Behave

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

## Code of Conduct

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Dear Colleagues:

UnitedHealth Group is a mission-driven enterprise. The over 320,000 people who work here in the United States and around the globe are helping people live healthier lives and helping build a better system that is more informed, engaged, and aligned. A health system where people, their doctors, and the private and public sectors work together to improve individual health, while increasing the performance of the entire health system – for everyone.

Every. One.

Each person – every interaction – matters. That’s an important part of our servant-led culture: Every day, we put the needs of those we serve first, one person, one interaction at a time, building trusting relationships and customer loyalty. Through nearly a trillion interactions per year, we earn the opportunity to serve even more people in more ways...and we grow.

We shoulder a tremendous responsibility for the health and well-being of more than 142 million individuals. They are counting on us to always do what is best for them and their families. The physicians and other care providers we interact with, day-in and day-out, must trust us to support them in their important work. Our customers, large and small, from massive government-led programs to local businesses, expect us to deliver the highest quality services to everyone we touch, always living by our shared values – integrity, compassion, innovation, relationships, and performance.

Our Code of Conduct is a handbook to guide our behavior, a reminder of our accountability to the people we are privileged to serve. We have a remarkable opportunity to positively influence the future of health care and the lives of millions of people. Please take time to review this important document and apply the Code to our work and all our interactions with consumers, care providers, and customers.

Sincerely,



David Wichmann  
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

Since 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's 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 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, but 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.





## Who 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:** [www.uhghelpcenter.ethicspoint.com](http://www.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.

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

### 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 concerns regarding workplace security.

### 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.uhg.com/sites/hub/Resources/Human-Capital-Help/Pages/default.aspx>.

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 high standards of personal and institutional integrity in our interactions with customers, members, employees, partners, and other stakeholders, including governments and the public. We recognize that appearances matter when it comes to integrity.



## Our Commitments

Each of us commits to:

- Review, understand and comply with UnitedHealth Group's policies and standards of conduct that are applicable to your position and business;
- Avoid making work decisions that affect your personal interests;
- Avoid 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 or relationships 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 biotech 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 various 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 state 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 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 they 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 excessive, if there is a legitimate business purpose for the event, and 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 important, but for government cost contracts it is essential, 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 value of these gifts is not excessive and each gift is reported in the appropriate general ledger account. All gifts to government officials and government employees 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:** [www.uhghelpcenter.ethicspoint.com](http://www.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 Biotech Manufacturers, Wholesalers or Distributors Policy Liaison**
- Your business unit's **Public Sector Team** and **Organizational Conflicts of Interest Liaison**

#### Associated Policies

- **Anti-Corruption Policy**
- **Conflicts of Interest**
- **Outside Directorships**
- **Related-Person Transactions Approval**
- **Gifts and Entertainment (Business Courtesies)**
- **Interactions with Pharmaceutical, Medical Device or Biotech Manufacturers, Wholesalers or Distributors**
- **Insider Trading**
- **Travel & Expense Management Policy**
- **U.S. Federal Government Contracting Policy**
- **Anti-Kickback Policy**
- **False Claims Acts Compliance Policy**





**Code of Conduct**

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# 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, practices, and procedures. When we are accountable, we earn the trust that our members, 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. **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 the law, this Code, Company policies, contracts, or standards of conduct, we must report them.

- **Cooperate with all investigations.**

You are expected to support the investigation and resolution of potential violations. This includes providing accurate, truthful, and complete information and documentation to assist the investigation.

# responsibility

## 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.

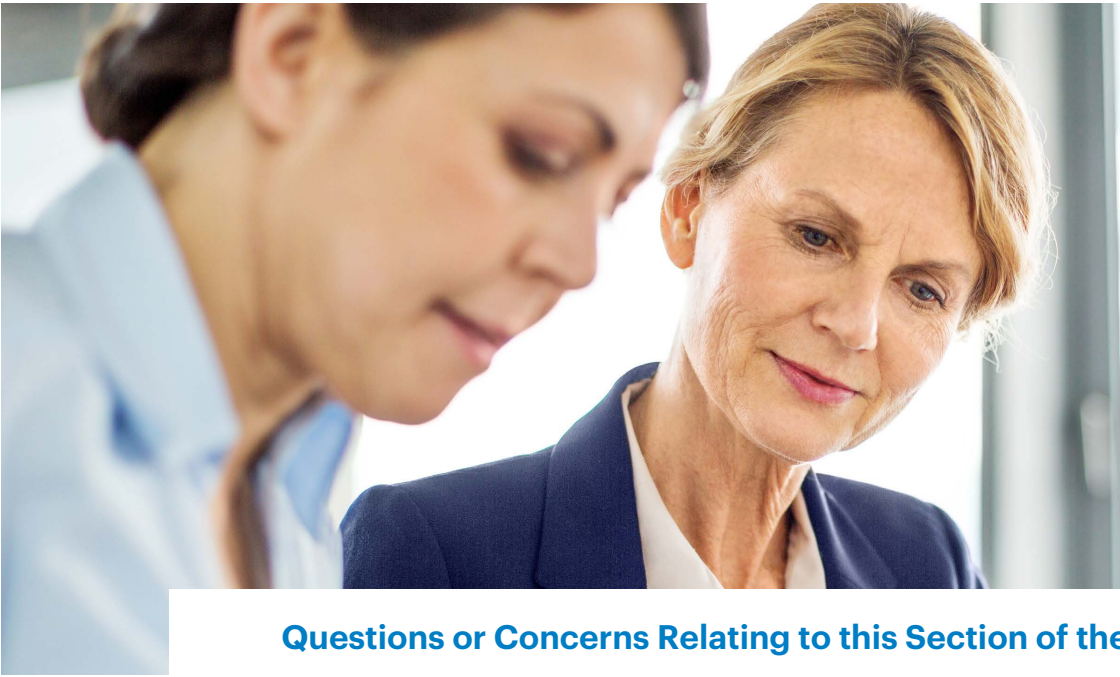
**Q. I believe my manager may be involved in misconduct, and I don't know where I should go to report the issue. Who should I talk to, and will I get in trouble if I'm wrong?**

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 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.

trust



## 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:** [www.uhghelpcenter.ethicspoint.com](http://www.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**

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# 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, the 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 and 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. While 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.
- **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.

# honesty

## 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 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. 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. Depending on the nature and subject of the call, you may want to speak in advance with your manager or business Legal Representative.
- 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 violate the antitrust laws. You should report the issue to your business Legal Representative.

integrity



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

### Contact:

#### Resources

- Your business **Legal Representative or Compliance Officer**
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- **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**

A healthcare professional, likely a nurse or doctor, is shown in profile, focused on a laptop. She is wearing teal scrubs and has a blue stethoscope around her neck. Her hair is pulled back in a ponytail. The background is a blurred clinical or office environment with a red wall visible in the distance.

**Code of Conduct**

# 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, 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 personal information.**

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 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.

# compassion

## 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, but that person told me that she had deleted it. I also realized that I forgot to send the email via encryption (i.e., I did not use the “Secure Delivery” option). Since 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 may only affect 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 in case 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 or non-work-issued or approved computing devices to conduct Company business, as the security of such email accounts or computers is unlikely to be as secure as required by Company policy.

**Q. I just passed my office’s shared printer and saw a patient’s medical records sitting out on the counter next to it with no one in the room. What should I do?**

A. Leaving this personal information unattended in plain view could compromise privacy or security. Secure the information and report the incident to one of the Resources listed in this section if you believe that the information was not secured in a manner appropriate

to its sensitivity. The Resource you contact will provide guidance on proper handling of the document, which may include destroying the document or delivering it to the person who printed it.

**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, such as a need to process claims or access information for a family member or a friend, ask your manager to reassign it.

**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 that will accomplish such tasks in an efficient manner while keeping information properly protected.

trust



## 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@uhc.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:** [www.uhghelpcenter.ethicspoint.com](http://www.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 United Help Desk at 1-(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)**





## Code of Conduct

# 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.**  
While 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 confidential and proprietary information.**  
Confidential and proprietary business information is among the Company's most valuable assets. Examples of this type of information include provider reimbursement rates to business partners and business strategies. All employees are responsible for safeguarding the confidential information in their possession or that they have access to. Be aware of use restrictions on external applications or websites that may compromise proprietary information.
- **Use UnitedHealth Group intellectual property, such as trademarks, logos, and brand identity only in ways 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

## Stewardship Challenges

- Q. Can I download for personal use music, new movies, and other programs onto my work computer?**
- 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, to open incorrectly addressed mail or to access or send inappropriate material. Also, use of electronic non-Company-approved instant messaging and downloading, storing and/or transmitting non-business-related multi-media 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 express prior written approval from both the UnitedHealth Group Chief Communications and Chief Financial Officers. If you learn that a company is inappropriately using a UnitedHealth Group brand, notify the UnitedHealth Group Corporate Legal Department immediately. All questions about the appropriate use of our corporate trademarks should be directed to the UnitedHealth Group Corporate Legal Department.
- Q. One of my direct reports told me that he stores the 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.
- 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.

# sustainability



## 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:** [www.uhghelpcenter.ethicspoint.com](http://www.uhghelpcenter.ethicspoint.com)
- **UnitedHealth Group Compliance & Ethics** (952) 936-7463 or  
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**





**Code of Conduct**

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## **Government Interactions**

UnitedHealth Group engages with government agencies and officials throughout the world — 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 maintaining UnitedHealth Group's successful relationships in the public sector and demonstrates 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 require you to register as a lobbyist.
- Government employees are frequently 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 we 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.
- If you are unsure about the requirements for appropriate interaction with government officials, or if you need further guidance, contact UnitedHealth Group Compliance & Ethics, the International Compliance team, or your business Legal Representative or Compliance Officer for assistance.

# relationships

## 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 regularly 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, customers, and counterparts.**

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

# accuracy

truthfulness



## 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. In addition, such a gift is prohibited by the Company's U.S. Federal Government Contracting policy. 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, 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, 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 (1-866-242-7727) 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.

compliance





## 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:** [www.uhghelpcenter.ethicspoint.com](http://www.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://detects.uhc.com/tipform/report\\_fraud.html](https://detects.uhc.com/tipform/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 Acts Compliance Policy**
- **Economic Sanctions and Sanctions Monitoring Policy**



## **Code of Conduct**

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# **Communications**

UnitedHealth Group's reputation comes, in part, from the relationships it maintains with the public, the press, analysts, and all who are touched by 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 should be aware of the basic securities laws requirements concerning public disclosure of Company information. In short, you may not discuss material, nonpublic information, such as 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 Company's Guidelines for Social Media Use. 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.

### Communicate Effectively and Appropriately

- **Refer members of the media to the Communications Department.**

A referral to the Communications Department 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 the Communications Department, 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.

clarity

## 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 via phone, email, social media or any other channel, refer the person to the Communications Department 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 UnitedHealth Group's Social Media Policy and 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 Corporate Communications.

**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 person asking the question to Investor Relations.

**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, as long as you make it clear that you are speaking on your own behalf, and not on behalf of the Company. 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 the Communications Department.

# collaboration





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

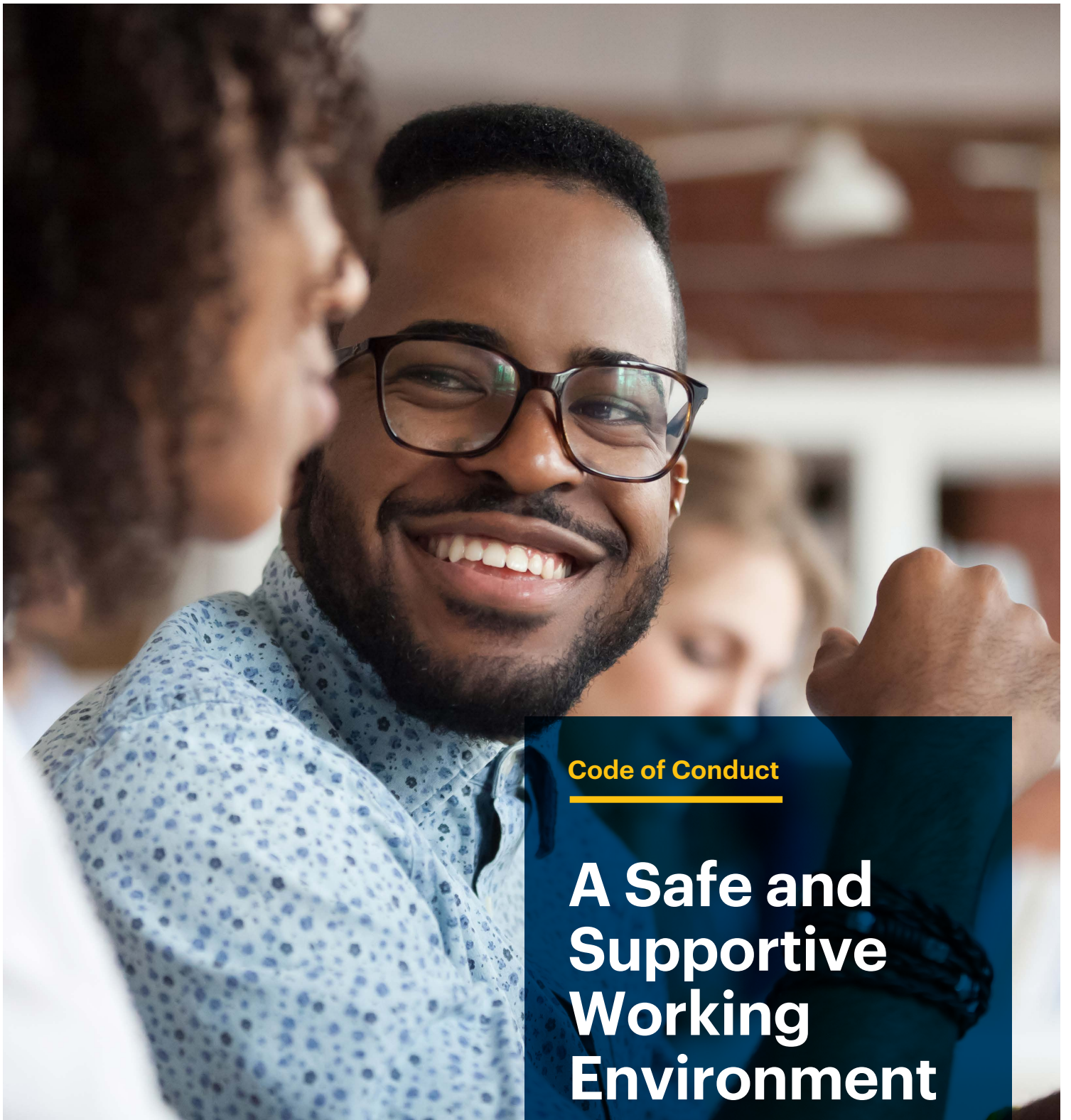
### Contact:

#### Resources

- Your business **Legal Representative or Compliance Officer**
- **Corporate Communications** (952) 936-3871
- **Investor Relations** (952) 936-7214
- **UnitedHealth Group Compliance & Ethics** (952) 936-7463 or [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)

#### Associated Policies

- **Provision of Information to the Investment Community and Media**
- **Crisis Communications**
- **Social Media Policy and Guidelines**



**Code of Conduct**

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# A Safe and Supportive Working Environment

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

## Our Commitments

Our working environment should promote respect and appreciation for our differences and acknowledge the value of diversity to our organization.

UnitedHealth Group will not tolerate behavior that endangers its employees, members, customers, or 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 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. 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 if you experience or witness discriminatory conduct or harassment in your workplace, or retaliation for reporting potential ethics violations, discrimination, or harassment.**

UnitedHealth Group does not permit discrimination or harassment on the basis of race, gender, color, creed, status with respect to public assistance, gender identity and/or expression, religion, sexual orientation, national origin, ancestry, citizenship status, marital status, age, disabilities, genetic information, status as a special disabled Veteran, Veteran of the Vietnam era, or other eligible protected veteran, or any other characteristic protected by national, federal, state, or local laws. Similarly, UnitedHealth Group prohibits any 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.

# respect

## 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 retaliate 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 retaliation. And remember: you can make an anonymous report, where permitted by law. If you experience or witness any behavior that you believe is prohibited retaliation, you should report the activity to HRdirect or the Compliance & Ethics HelpCenter.

compassion





## 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 <https://hub.uhg.com/sites/hub/Resources/Human-Capital-Help/Pages/default.aspx>
- **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:** [www.uhghelpcenter.ethicspoint.com](http://www.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**



## Code of Conduct

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# Our Shared Responsibility

The UnitedHealth Group Code of Conduct: Our Principles of Ethics & Integrity embodies and elaborates upon the high ethical standards that guide the way we conduct our business. These standards, reflected in our shared values of integrity, compassion, relationships, innovation, and performance, inform and inspire our work to help people live healthier lives and help make the health system work better for everyone. Our ability to operate as a global business capable of serving the health care needs of hundreds of millions of individuals and society depends upon our living these values every day.

Thank you for taking the time to review and understand the Code and for incorporating these values into your work with the people we serve.

A handwritten signature in black ink that reads "Marianne D. 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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