

UNITEDHEALTH GROUP

# 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 (“UnitedHealth Group” or “the Company”) share six values that best describe how we aspire to conduct ourselves and our business: Integrity, Compassion, Inclusion, Relationships, Innovation, and Performance. Together, these six values describe the behaviors that are expected of us by the people we interact with and serve. All of us must apply this Code every day, both inside and outside of UnitedHealth Group.

Integrity purposefully leads the list. Integrity means we are honest, fair, accountable, and responsible in our interactions with 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 five other values and everything we do at UnitedHealth Group.

The UnitedHealth Group Code of Conduct: Our Principles of Ethics & Integrity (“Code,” “Code of Conduct,” or “Principles of Ethics & Integrity”) provides guidelines to help us do our work in an ethical and compliant manner.

# Honor Commitments.

## We Believe

We must be an enterprise that represents a high 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 high standards of ethical behavior.

## 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.

# Never Compromise Ethics.

# Our Shared Responsibility

At UnitedHealth Group, our Code of Conduct and our shared values—Integrity, Compassion, Inclusion, Relationships, Innovation, and Performance—are more than just words. They are the foundation of everything we do and reflect our deep commitment to the millions of people we are privileged to serve. Our Code of Conduct is central to our business strategy, our culture, and our mission to help make the health care system work better for everyone. It guides our actions and decisions, setting clear expectations for ethical behavior as we work with our colleagues, members, patients, providers, and partners.

In a rapidly evolving environment, the Code helps us navigate complexity with confidence and consistency. It empowers us to act with integrity, uphold trust, and strive for excellence in every interaction.

Thank you for taking the time to understand and embrace this important document. Your commitment to these standards—and the choices you make every day—are what bring our values to life.

**Natalie A. Pons**

Chief Compliance & Ethics 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 integrity 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 additional resources available to help you as well.

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 unit 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, Employee Center or your business Compliance Officer or Legal Representative.

### 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 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 appropriate, 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. Those waivers 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.

## Employee Center

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

**Online:** <https://employeecenter.uhg.com>

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 (U.S.)

**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:** 800-260-1298 (U.S.)

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

Your contact to report unsafe conditions and workplace hazards.

## Corporate Security

**Phone:** 855-936-8999 (U.S./toll free), or 952-936-8999 (U.S./add +1 for international calls)

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

**Online:** [https://unitedhealth.ethicspointvp.com/custom/unitedhealth/forms/security/form\\_data.asp](https://unitedhealth.ethicspointvp.com/custom/unitedhealth/forms/security/form_data.asp)

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://uhgazure.sharepoint.com/sites/Employee-Resources/SitePages/Employee-Assistance-Program.aspx>

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

## Your Business Compliance Officer or Legal Representative

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

**Online:** <https://uhgazure.sharepoint.com/sites/UHG/SitePages/Legal-Compliance-Regulatory.aspx>

# Integrity

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



## Our Commitments

**At UnitedHealth Group, we:**

- **Review, understand and comply with UnitedHealth Group’s policies and standards of conduct that apply to our position and business;**
- **Avoid making work decisions that affect our 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 members’ 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 supplier, including government officials, health care providers, patients, 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 may become aware of material information about UnitedHealth Group (or another company) that is not generally known or available to the public. Keep this

information confidential. Do not trade in stock or other securities of a company or recommend that others do so based on this information.

- **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.

### Integrity of Books and Records

UnitedHealth Group is committed to the integrity of its records, books, financial and other reporting. Employees, and contractors are responsible for, and directors oversee the process of, 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 recently ran into an old friend who now works for a physician group that is part of our network. This friend then asked 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. First, disclose the contact and your prior relationship to your manager who will decide whether it is appropriate for you to respond at all or whether to direct her to another resource in the Company.
- Q. I have received an invitation to join one of our vendors at a professional sports event. Can I accept the ticket?**
- A. Perhaps. Submit your request to your manager, who will consider whether: (a) the cost of the ticket exceeds Company policy; (b) there is a legitimate business purpose for the event; (c) accepting the ticket may influence or appear to influence your business judgment; and (d) acceptance of the ticket is allowed by applicable law. You must also follow any local compliance policies, which may require additional approvals.
- Q. I have been invited to serve on the board of a nonprofit 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 for a more complete assessment.
- Q. I received a call from an investment bank asking if UHG wants to participate in an investment group for a small health IT start-up company. I don't know if UHG is interested, but I am. Can I participate individually?**
- A. As an employee of UHG, you are required to alert the organization to any business opportunities that arise in connection with enterprise activities. Contact your manager or business Compliance Officer or Legal Representative to determine whether this is an opportunity that must be presented to the Company before you pursue it individually. The activity must then be disclosed and approved pursuant to our Conflict of Interest Policy.



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

### Contact:

#### Resources

- Your **Manager**
- Your business **Compliance Officer or Legal Representative**  
**Online:** <https://employeecenter.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](http://uhghelpcenter.ethicspoint.com)
- **UnitedHealth Group Compliance & Ethics**  
**Phone:** 952-936-7463 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)
- **International Compliance**  
[InternationalCompliance@uhg.com](mailto:InternationalCompliance@uhg.com)

#### Associated Policies

- **Anti-Corruption**
- **Anti-Kickback**
- **Conflicts of Interest**
- **False Claims Act Compliance**
- **Gifts and Entertainment (Business Courtesies)**
- **Insider Trading**
- **Interactions with Pharmaceutical, Medical Device or Biologic Manufacturers, Wholesalers or Distributors**
- **Outside Directorships**
- **Related-Person Transactions Approval**
- **Travel & Expense**
- **UnitedHealth Group Commitment to Human Rights**
- **U.S. Federal Government Contracting**
- **Professional Boundaries Between Employees and Consumers**

# 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.**

### Be Accountable

Prompt reporting of suspected Code or policy violations and potentially illegal or unethical conduct to an appropriate Company representative 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 must take immediate action and involve Legal, Compliance, or People Team representatives, as appropriate.

UnitedHealth Group takes 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 Employee

Center 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.

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

Additionally, given the role we play in the healthcare system, we have a shared 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.

## 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 may be acting on an incorrect interpretation of a legal requirement, you should contact your manager or your business Compliance Officer or Legal Representative 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 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. One of my work assignments includes a contract with the U.S. federal government for which UHG is paid on a cost basis. My manager told me to bill 75% of my time to the government contract, but I only spend 25% of my time working on that contract. What should I do?**

A. Immediately contact your business Compliance Officer or Legal Representative 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 UHG – and possible exclusion from future business with this and perhaps even other government clients.

**Q. I work in claims processing for government programs, 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 Compliance Officer or Legal Representative. You may also make a report to the Health Care Fraud Tip Line of any potentially fraudulent activity or follow your business's fraud-reporting procedure.

**Q. One of my colleagues is an orthopedic surgeon who treats a broad range of patients, including Medicare Advantage members. She has developed a close relationship with a local durable medical equipment (DME) supplier where she refers many of her patients for post-surgical equipment. I recently learned that the DME supplier has started providing her free gifts, like tickets to sporting events and expensive dinners. Is this okay or do I have a responsibility to report this?**

A. It's likely not okay, and it should be reported to the Compliance & Ethics HelpCenter. Gifts, meals and entertainment in excess of specific limits may be a violation of both the UHG Gifts and Entertainment (Business Courtesies) Policy and U.S. Anti-Kickback Statute, which prohibits providing anything of value for the purpose of influencing patient referrals. Health care decisions should always be based on what is best for the patient and not be influenced by lavish gifts or other financial incentives. Your colleague should stop accepting anything from the DME supplier and contact her business legal or compliance resource for guidance. In addition, be sure to follow applicable procurement policies and procedures when purchasing medical equipment or supplies.



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

### Contact:

#### Resources

- Your business **Compliance Officer or Legal Representative**
- **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 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)
- The **Health Care Fraud Tip Line**  
**Phone:** 844-359-7736 (U.S.)  
**Online:** [uhc.com/fraud](http://uhc.com/fraud)
- Optum Partner or Customer Concerns: Optum employees should report potential health care fraud, waste or abuse regarding Optum's customers or external partners to [reportfwa@optum.com](mailto:reportfwa@optum.com).
- Optum Behavioral Health: Report potential behavioral health fraud, waste, abuse or errors by contacting Optum PNI online using the Report BH Fraud portal or by email at [optum.pni.tips@optum.com](mailto:optum.pni.tips@optum.com)

#### Associated Policies

- **Enterprise Issue Management Protocol**
- **Non-Retaliation Policy**
- **Reporting Misconduct**

# 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.**

### Comply with Fair Competition Laws and Company Policies

Many laws and regulations define and promote 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 business enterprises compete on the merits, including on the basis of price, quality, and service. To comply with these laws, each employee, director, and contractor must carefully follow our antitrust and firewall policies. Given the diversity of our enterprise, parts of our business may have access to information about our competitors that is competitively sensitive and should only be used as allowed by applicable firewall 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 are strictly prohibited and can result in severe penalties against both you and the Company. Although in some circumstances 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 avoid

prohibited subjects or activities. Consult your Compliance Officer or Legal Representative assigned to your business to understand the prohibited subjects and other limits that may apply 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 careful not to share competitively sensitive information or raise other prohibited subjects 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.** Consult with the Legal Representative assigned to your business to determine whether the project is permissible, and, if so, how it should be managed. 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 Compliance Officer or Legal Representative assigned to your business. When accessing or using competitively sensitive information in your job, only use information that is required for your job, and only use the minimum amount of information necessary.

## 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 not discuss or share competitively sensitive information (for example, information relating to pricing or market share) with representatives of other companies or industry and trade associations. If such information is shared with you, you should immediately end the conversation and report it to your Compliance Officer or Legal Representative assigned to your business. You should not share the information with anyone else at UnitedHealth Group.
- 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 activity raises serious antitrust concerns. An agreement to divide sales territories is a form of market allocation, which could lead to criminal prosecution. You should immediately end the conversation and report it to your Compliance Officer or Legal Representative.
- Q. I work in Optum Health 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 Compliance Officer or Legal Representative. Optum Health's provider businesses contract with competitors of UnitedHealthcare and may receive competitively sensitive information, which must be protected. Sharing the data requested without review and approval by legal counsel would violate our firewall policy. 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 supplier 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 your Compliance Officer or Legal 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 Compliance Officer or Legal Representative first.
- 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. Agreements with competitors not to recruit employees can raise serious antitrust concerns. These types of agreements (often called "no poach" or "non-solicitation" agreements) have been prosecuted criminally. There may be legitimate reasons to have these types of agreements, but you should immediately report the issue to your Compliance Officer or Legal Representative.



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

### Contact:

#### Resources

- Your business **Compliance Officer or Legal Representative**
- **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 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)

#### Associated Policies

- **Antitrust**
- **Firewall**
- **U.S. Federal Government Contracting/  
Organizational Conflicts of Interest Guidance**

# Privacy and Information Security

Maintaining the privacy, integrity 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 the use and disclosure of 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, 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 classification of the information and applicable law or policies. If sharing personal information with external recipients is required for your job, ensure you have your own approved ShareSafe Profile as required by policy.

## 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 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 them 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 EOB 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 that impacts your professional boundaries, whether it is 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 the correct personal information is handed to patients.

**Q. Am I allowed to input or use personal information with Microsoft Copilot?**

A. Generally speaking you should never put personal, confidential or competitively sensitive information in CoPilot. Review our privacy policies to assess appropriate use of our various CoPilot functionalities or contact one of the Resources listed for assistance.

**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 one of the Resources listed in this section before beginning the review.

**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 unattended for a short period. Device screens should also 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 make the information out. 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 **Compliance Officer or Legal Representative**
- **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](https://uhghelpcenter.ethicspoint.com)
- **UnitedHealth Group Compliance & Ethics**  
**Phone:** 952-936-7463 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)
- All incidents that compromise information security safeguards or policies must be reported to the IT Help Center 888-848-3375 (U.S. & Canada), or find your country's dialing information online at the Contact Help Desk intranet site.
- **UnitedHealth Group Enterprise Security & Resilience Office**  
**Phone:** US: 888-255-2554,  
International: 952-833-6300  
**Online Form:** <https://forms.office.com/pages/responsepage.aspx>

#### Associated Policies

- **Enterprise Incident Management Reporting and Response**
- **Enterprise Information Security Policy and Standards**
- **Enterprise Recording and Transcription**
- **Enterprise Social Media Guidelines**
- **Limits on Accessing, Using and Disclosing UnitedHealth Group Employee Benefit Plan Data**
- **Responsible AI**
- **UnitedHealth Group Personal Information Privacy and Data Protection**
- **UnitedHealth Group Privacy Policy Manual (HIPAA)**
- **Use of Personal Communications Tools for Company Communications**

# 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 used with external applications or on websites without proper approvals.

- **Use Artificial Intelligence (AI) and emerging technologies responsibly.**

AI tools may only be used in accordance with the Company's Responsible AI policies and governance processes. Before using or deploying AI ensure it has undergone the

appropriate Responsible AI review. Employees are expected to exercise good judgment in the use of AI, safeguard protected information and avoid using unapproved external AI tools for Company work.

- **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 in commercial activities 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. I want to use a new AI tool that is available for free online, can I use it to help me with my work?**

A. All AI tools must be vetted through UnitedHealth Group's Responsible AI processes, whether developed internally or by a vendor. Third party solutions (even free solutions) should be submitted through Procurement, often vendors of free solutions have separate commercial/licensed offerings. Never put confidential business or health information about our members or patients into AI tools freely available on the internet.

**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. Downloading, storing and/or transmitting non-business-related multimedia using UnitedHealth Group communications systems is prohibited.

**Q. One of my direct reports was working with one of our vendors and found the vendor is using one of UnitedHealth Group's brands on its website. Another one of my direct reports recently identified that a provider that she believes is out of network has included UHC's logo on its website. 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 may be inappropriately using a UnitedHealth Group brand or is using a trademark that may be confusingly similar to a Company brand, notify your Compliance Officer or Legal Representative.

**Q. One of my direct reports told me that he uses text and a messaging app to send messages about projects to our colleagues. Should he be doing that?**

A. No. Business records, in both paper and electronic form, serve as evidence of important business decisions. Generally, all business communications by employees should be conducted on Company devices or Company-approved secure mobile devices or application management tools, such as Outlook and Teams. Company policy strictly prohibits using personal email services like Gmail, Yahoo, or iCloud to conduct Company business. Using text messaging apps like Telegram, Snapchat, Signal, WhatsApp, and WeChat for business communications can create risk for our Company, because these apps often lack the robust security measures needed to protect sensitive business information and they make it difficult to maintain, preserve, and collect records and comply with legal requirements. Text and messaging apps can be used for brief, informal non-confidential communication, such as establishing a time and place for a meeting or confirming arrival at a location. All business-related records and communications on your personal devices are subject to review if necessary for an internal investigation and, therefore, must be preserved. 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, including any business-related communications/records sent on your personal devices. 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 suppliers we have engaged 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 Compliance Officer or Legal Representative for assistance.



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

### Contact:

#### Resources

- Your business **Compliance Officer or Legal Representative**
- 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](http://uhghelpcenter.ethicspoint.com)
- **UnitedHealth Group Compliance & Ethics**  
**Phone:** 952-936-7463 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)
- **Enterprise IP Legal**  
**Email:** [IPLegal@uhg.com](mailto:IPLegal@uhg.com)

#### Associated Policies

- **Corporate Environmental**
- **Email Retention**
- **Endorsements and Use of Company Names**
- **Enterprise Records and Information Management**
- **Intellectual Property Policy – Concerning Patents, Trade Secrets, Copyrights, Trademarks, Domain Names, and Social Media**
- **Internet and Telephones**
- **Software Compliance**
- **Use of Personal Communications Tools for Company Communications**

# 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.**

### Comply with All Laws Regarding Government Interaction

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, domestic and international, prohibit UnitedHealth Group and all of its businesses, employees, independent contractors, and business partners (suppliers,

consultants, brokers, etc.) from giving bribes to government officials. A bribe is anything of value, including favors, gifts, meals, entertainment, offers of employment, 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 be attributed to UnitedHealth Group in jurisdictions with pay-to-play laws and could adversely affect the Company's ability to do business within those jurisdictions. You must comply with all applicable laws and regulations and Company policies regarding personal political activities, including preclearing your political contributions and activities when required.
- 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 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 Compliance Officer or Legal Representative early 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 a government procurement or contract 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 Compliance Officer or Legal Representative to ensure that you are aware of applicable anti-corruption requirements.

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

All advocacy activity on public policy and political contributions on behalf of the Company are managed by UnitedHealth Group Government Affairs in coordination with the UnitedHealth Group Legal Department. You should not engage independently in advocacy on public policy on behalf of the Company or engage independently in political activity on behalf of the Company.

- **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. You must preclear your political contributions when those contributions may be attributed to UnitedHealth Group.

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

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, including meals, from private parties, particularly when the donor is seeking business or is already doing business with a government agency. Many jurisdictions also prohibit what can be discussed before a bid is released. Notify your manager and contact your Compliance Officer or Legal Representative.

**Q. I was invited to lunch next week by an employee of my state's insurance commission whom I have 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 People Business Partner about the inquiry before responding to the invitation. You may also contact your Compliance Officer or Legal Representative.

**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 your Compliance Officer or Legal Representative.

**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 Compliance Officer or 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. In addition, Company policy prohibits all facilitation payments. You should report the request to your Compliance Officer or Legal Representative.



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

### Contact:

#### Resources

- Your business **Compliance Officer or Legal Representative**
- 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 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)

#### Associated Policies

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

# 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.**

### Communicate Effectively and Appropriately

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 material non-public information including 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 legally required to disclose such information.

Social media has become an increasingly important communication tool, but it also presents an arena for potential communication 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, X, Wikipedia, Pinterest, Instagram, TikTok, chat rooms, message boards, etc.) should exercise good judgment and follow the Company's Guidelines for Social Media Use.

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.

- **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.
- **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 supplier or other business relationships.
- **If you are asked to speak at a conference or other public event, you are required to follow Company policy and receive approval before accepting any engagements.**

## 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 UnitedHealth Group business information, refer the person to Media Relations without making a statement and alert Media Relations of the inquiry.

**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 our 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 Media Relations and alert Media Relations of the inquiry.

**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 expressly 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 appropriate as long as you make clear that you are not speaking on behalf of the Company. However, if you believe that your opinion might in any way be attributed to the Company, even through use of your title or by inference, you should refrain from commenting and/or refer the person to Media Relations.

**Q. I have been invited to speak at a conference and include a written article in the conference materials. Do I need to obtain advanced approval to participate in the conference or submit the article?**

A. Yes. If you are asked to speak at a conference or other public event or you are invited to submit written material for publication, you are required to follow Company policy and receive approval before accepting any engagements.



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

### Contact:

#### Resources

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

#### Associated Policies

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

# 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.**

### Promote a Safe and Supportive Working Environment

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, 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.

### Maintaining a Safe and Supportive Environment is Everyone's Collective Responsibility

- **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 on Company property, 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 at 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 Employee Center 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 Employee Center, your manager, a People Business Partner, 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 race, national origin, religion, age, color, sex, sexual orientation, gender identity, disability, or protected veteran status, or any other characteristic protected by local, state, or federal laws, rules, or regulations. 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, alcohol, and 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 Employee Center.

**Q. My co-worker told me that her spouse 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 does 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 Employee Center, 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. Individuals who make a good-faith complaint or report harassment or other inappropriate behavior, or provide information related to such complaints or reports, are protected from intimidation or retaliation. You can make an anonymous report, where permitted by law. If you experience or witness any behavior you believe is prohibited intimidation or retaliation, you should report the behavior to Employee Center or the Compliance & Ethics HelpCenter.



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

### Contact:

#### Resources

- Your **Manager**
- **Employee Center**  
**Phone:** 800-561-0861 (U.S.), or find your country's dialing instructions via the link below.  
**Online:** <https://employeecenter.uhg.com/>
- **Corporate Security**  
Available 24 hours a day, 7 days a week.  
[corporatesecurity@uhg.com](mailto:corporatesecurity@uhg.com)  
**Phone:** 855-936-8999 (U.S./toll free), or 952-936-8999 (U.S./add +1 for international calls)  
**Online:** [https://unitedhealth.ethicspointvp.com/custom/unitedhealth/forms/security/form\\_data.asp](https://unitedhealth.ethicspointvp.com/custom/unitedhealth/forms/security/form_data.asp)
- 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 (U.S.)  
**Email:** [EthicsOffice@uhg.com](mailto:EthicsOffice@uhg.com)

#### Associated Policies

- **Alcohol and Drugs in the Workplace**
- **Equal Employment Opportunities**
- **Non-Discrimination**
- **Non-Retaliation**
- **One Breath**
- **Reporting Misconduct**
- **Violence-Free Workplace**

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