

Enterprise Data Privacy Program

As a leading health care organization, Centene manages protected and confidential personal data (e.g., health information, personally identifiable information, etc.) of members, employees, and business partners. The Company is committed to handling this data responsibly and to respecting the privacy rights of all individuals. Centene and every employee has a responsibility to safeguard personal data maintained by the Company.

Centene's Enterprise Privacy department manages the data privacy program and is responsible for ensuring its effectiveness. The following is a description of the key elements of Centene's data privacy program.

Data Privacy Program Policies and Procedures

Centene and its subsidiaries publish and maintain data privacy policies and procedures designed to comply with applicable regulations and guide its workforce in the proper administration of confidential data in all areas of operations.

In addition, data privacy is a key component of Centene's Business Ethics and Code of Conduct (BECC). All employees are required to review, attest, and adhere to the corporation's BECC at hire and annually thereafter.

Designation of a Privacy Officer and Privacy Officials

Centene has appointed a senior level Corporate Privacy Officer to oversee the Enterprise Privacy program and ensure its effectiveness, advise executive leadership on data privacy compliant practices, and report data privacy matters to Centene's Board of Directors.

In addition, each Centene subsidiary has a designated Privacy Official directly responsible for managing the data privacy program for their subsidiary. The subsidiary Privacy Official's responsibilities include:

- serving as a direct resource to members and employees for data privacy questions or concerns,
- advising functional areas on data privacy compliance practices and strategies,
- educating employees on data privacy requirements,
- monitoring the effectiveness of data privacy program, and
- providing subject matter expertise on data privacy requirements specific to the business unit's market.

Data Privacy and Security Training and Awareness

All employees receive mandatory data privacy and security program training at hire and on an annual basis. The training includes an overview of data privacy regulations applicable to Centene, instructs employees on how to properly protect data they work with and how to report data privacy related issues or concerns. Employees also receive job-specific training related to managing members' requests to exercise their data privacy rights.

In addition, Centene continually reinforces employee awareness of data privacy and security topics and issues through periodic reminders delivered through email and the company's intranet. Employee awareness messaging includes topics such as how to identify and report suspicious emails and how to avoid common mistakes that lead to data privacy incidents.

Effective Lines of Communication

Centene has established several communication channels available to employees, members and business partners to report issues, raise questions and exercise data privacy rights.

Employees are encouraged to utilize a variety of communications channels available to them including verbally in team or leadership meetings, by email to their people leaders, through a dedicated Privacy email box, or through the Employee Helpline. Employees are required by policy to report data privacy issues or concerns. Centene policy forbids retaliation against employees that report concerns in good faith.

Members are provided communication channels to exercise their data privacy rights through conspicuous postings on our subsidiary websites, in written member materials such as the member handbook and other correspondence, and over the phone with our customer service department.

Centene provides its business partners with contacts at the time of contracting and clear instructions on the manner and timeliness of communicating data privacy and security related matters.

Auditing and Monitoring

The Enterprise Privacy department monitors and routinely audits key areas of the Company's operations to ensure compliance with the data privacy program and regulatory requirements. Internal auditing and monitoring helps to ensure the Company and its subsidiaries are continuously improving their data privacy program.

Record Retention

Centene's Record Management policy and procedures support the company's record retention, storage, and retrieval processes. The records retention schedule is informed by federal, state, contractual and administrative requirements.