

Centene's Vendor Code of Conduct

"Centene abides by all applicable laws and conducts business affairs in accordance with standards and principles of ethical business conduct that shape our culture of ethics and sound corporate governance. We expect our vendors to uphold these same principles and operate in compliance with federal, state, and local laws. This joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships."

- Sarah London, Chief Executive Officer, Centene

We are committed to transforming the health of the community, one person at a time. Centene's commitment to delivering high-quality health services to at-risk populations has not wavered. Since our inception, we have never lost sight of the principles upon which our company was founded, including those that shape our focus on the environment, the health and social well-being of the communities we serve, and our culture of ethics and sound corporate governance.

Our expectation is that our vendors comply with relevant legal and regulatory requirements and partner with us by meeting the expectations described in this document. We will utilize these areas of focus to gauge the strength of our partnerships, in part, by the compliance and progress our partners make annually through requests for information, proposal and quote, master service agreements, quarterly business reviews, and questionnaires.

Environmental

We believe the health of our planet is essential to the well-being of our members, employees and the communities we serve. We are committed to being good stewards of the earth by making investments today that will deliver health benefits for years to come. The [Advancing Environmental Resilience](#) section of our Corporate Sustainability website provides further details on how the environment impacts the health of our members and the actions we are taking to make a difference in the communities we serve.

In the context of our supply chain, we have the following expectations:

Environmental Compliance

Vendors will operate in compliance with all federal, state and local environmental requirements.

Environmental Footprint

Vendors will actively identify their environmental footprint and pursue opportunities to reduce it. We support the implementation of initiatives to reduce greenhouse gas emissions, conserve energy and water and reduce waste.

Social

Diversity, Equity and Inclusion (DEI)

We say that DEI is in our DNA. Since our founding, we have held the belief that diversity, equity and inclusion brings out the best in all of us. Centene's culture stems from a commitment to diversity, equity and inclusion, and this commitment remains our guide as we navigate into the future. Our efforts do not reside within a single business unit or level of leadership. They reach all aspects of our organization. As a result, we believe that every single employee and stakeholder, both internal and external, are agents of culture and influence the creation of an equitable society.

Accountability

We look forward to continuing to partner with our vendors and other stakeholders to advance diversity, equity and inclusion in our communities.

We will develop a set of diversity expectations for our vendors, contractors, providers, and other partners consistent with our internal commitment to diversity, equity and inclusion. We will continue to cultivate relationships within our communities and be intentional in our partnerships to advance supplier diversity.

Supplier Diversity

We believe it is our responsibility to drive business opportunities for historically disenfranchised vendors. Our goal is to create a path for vendors to thrive within our supply chain. Through national/local vendor partnerships, we will foster strategies that include both prime and subcontracting relationships. We believe that by including our partners in our strategies we will increase the economic impact within our service areas.

We will track and measure our partners' supplier diversity programs for inclusive bidding practices and programming that provides small and diverse businesses with opportunities, skills and experience to grow in a changing environment.

Human Rights and Labor

We expect our vendors to partner with us by sharing our [commitment to human rights](#). At Centene, we believe in conducting our business affairs in accordance with the standards and rules of ethical business conduct, which includes zero tolerance for the denial of basic human rights. We will take appropriate action if we become aware that any party to our business transactions are denying basic human rights. Per our policy, denied human rights include, but are not limited to, the following:

- a lack of access to food, water and/or sanitation;
- human trafficking;
- forced labor;
- child labor;
- discrimination & harassment;
- other illegal and/or unethical activities.

Working Conditions

Centene expects its vendors to provide adequate working conditions to all workers. Vendors will comply with all applicable minimum wage laws and workplace laws regarding maximum working hours, rest periods and overtime pay. We expect our partners to provide a clean and safe working environment and to comply with all health and safety requirements in the locations in which they operate.

Governance / Ethics and Compliance

Data Privacy and Security

Our commitments require us to maintain our members' trust. This trust includes leveraging information security practices to maintain the privacy of member data. Our privacy policies govern the collection and use of member data and describe the measures we take to protect information and how members may initiate inquiries and raise concerns regarding the collection, sharing and use of their personal data. We have established procedures for responding to data incidents, including when and how to engage with internal management, stakeholders and law enforcement.

Each party in our vendor relationships will protect the confidential information of other parties with at least the same degree of care that such party exercises with its own confidential information, but in no event less than a reasonable degree of care.

Anti-Bribery & Anti-Corruption

Vendors will not offer or give anything of value for the purpose of improperly influencing a government or private contract, award, consent, legislation or other action that would give the appearance of attempting to improperly influence such actions.

Anti-Competitiveness

Vendors will not engage in any activity that violates antitrust laws or unlawfully restrains competition.

Conflict of Interest

Each of our vendors will ensure that they and their personnel do not have conflicts of interest with respect to Centene and the services provided. Conflicts of interest include activities or relationships with other persons or entities that may result in a person or entity being given an unfair competitive advantage, or being unable or potentially unable to:

- render impartial assistance or advice to Centene
- perform contracted work with objectivity

Please report any deviations from the expectations contained herein via:

askprocurement@centene.com