

## POLICY AND PROCEDURE

<b>DEPARTMENT: Compliance</b>	<b>REFERENCE NUMBER: CC.COMP.14</b>
<b>EFFECTIVE DATE: 08/06</b>	<b>POLICY NAME: Whistleblower Policy</b>
<b>REVIEWED/REVISED DATE: 08/14; 08/15; 07/16; 07/17; 03/19; 4/20</b>	<b>RETIRED DATE: N/A</b>

### SCOPE:

This policy applies to all directors, officers, and employees of Centene Corporation, its affiliates, health plans, and subsidiary companies (collectively, the “Company”).

### PURPOSE:

The purpose of this policy is to establish the Company’s commitment to the highest possible standards of ethical, moral and legal business conduct, and promote open communication. As such, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from retaliation or victimization for whistleblowing in good faith.

### POLICY:

This policy is intended to cover concerns that could have a significant impact on the Company, such as actions which: may lead to incorrect financial reporting; are unlawful; violate Company policies and procedures including the Business Ethics & Code of Conduct; or otherwise amount to serious improper conduct. If an employee is aware of this type of conduct, they are encouraged to report via the channels discussed below in the Procedure section.

Employees are encouraged to include their identity and contact information when reporting a concern, because appropriate follow-up questions and investigations may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated to the fullest extent possible. Every effort will be made to protect the identity of the individual reporting the concern, unless it is required to be released under state or federal law.

Harassment, victimization, or retaliation of and/or against the individual reporting the concern **will not be tolerated**.

Any individual who knowingly submits a false or malicious allegation could be subject to disciplinary action outlined in CC.HUMR.17 – Performance Management. Malicious allegations could include allegations not made in good faith, or allegations intended to harm another employee that are not reasonably based in fact.

### PROCEDURE:

1. This procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported to:
  - a. Supervisors;
  - b. Local Management Teams;
  - c. Business Unit Compliance Officers;

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- d. Corporate Compliance Officers;
  - e. Internal Audit or Enterprise Risk professionals;
  - f. Compliance Mailbox ([Compliance@centene.com](mailto:Compliance@centene.com));
  - g. Ethics Point ([centene.ethicspoint.com/](http://centene.ethicspoint.com/)); or
  - h. Ethics & Compliance Helpline: 1-800-345-1642. A third party answers this helpline. See CC.COMP.02 for internal protocols regarding handling of helpline calls.
2. Callers to the helpline have the ability to remain anonymous if they choose. Employment-related concerns should be reported through normal channels such as the employee's supervisor or the local HR representative.
  3. Any reports of serious concerns relating to financial reporting, unethical or illegal conduct, should be reported as early as possible in order to facilitate prompt action.
  4. Although an employee is not expected to prove the truth of an allegation, the employee must be able to demonstrate to the person contacted that there are sufficient grounds for concern.
  5. An employee submitting a complaint, whether anonymous or otherwise, must fully cooperate in any investigation stemming from the complaint.
  6. The following action will be taken once a complaint is received:
    - a. Initial inquiries will be made to determine whether an investigation is appropriate. Some concerns may be resolved by agreed action without the need for investigation.
    - b. Whether reported to Company personnel or through the helpline, the reporter will receive follow-up in two weeks:
      - i. acknowledging that the concern was received;
      - ii. if possible, indicating how the matter will be dealt with;
      - iii. giving an estimate of the time required for a final response;
      - iv. notifying the reporter whether initial inquiries have been made;
      - v. informing the reporter whether further investigations will follow;
      - vi. indicating that final results of the investigation may not be shared beyond need-to-know basis.
    - c. The amount of contact between the individual reporting the concern and the investigator(s) of the concerns will depend on the nature of the issue and the

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clarity of the information provided. Further information may be sought from the individual reporting the concern.

- d. Subject to legal constraints, the reporter will receive information about the outcome of any investigations. Details of the investigation may not be shared with the reporter.
- e. Individuals who bring an issue to the attention of the organization will not be retaliated or discriminated against in accordance with CC.COMP.05 – Prohibiting Retaliation against Employees, Individuals, or Others.

<b>REFERENCES:</b>
Business Ethics and Code of Conduct CC.COMP.02 – Internal Handling Compliance - Compliance Hotline Calls CC.COMP.05 – Prohibiting Retaliation Against Employees Individuals or Others CC.HUMR.17 – Performance Management

<b>ATTACHMENTS:</b>
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<b>DEFINITIONS:</b>
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### REVISION LOG

<b>REVISION:</b>	<b>DATE:</b>
Updated Attachment A with current list of Resources for reporting compliance issues.	04/01/2013
Attachment A removed	06/26/2013
Replaced “Corporation” with “Enterprise”	07/20/2016
Replaced “Enterprise” with “Company”; Updated the scope language; Update the reporting hierarchy structure; Rearranged the Policy section.	07/19/2017
Updated the name of the Company’s Business Ethics and Code of Conduct	03/05/2018
Non-substantive revisions to simplify language; Added reference to HR policy addressing discipline.	4/24/2020
Added language requiring participation in any investigation stemming from the employee’s complaint	5/22/2020

### POLICY AND PROCEDURE APPROVAL

The electronic approval retained in RSA Archer, Centene's P&P management software, is considered equivalent to a signature.