Principles of Business Ethics

You Are the Key to Integrity
Humana’s Vision
To become the most trusted name in health solutions.
Dear Associate:

Humana is committed to maintaining high ethical standards in the conduct of its business. The key to upholding those standards is through the daily decisions and actions of each and every associate. The key to integrity is you.

We want to make it easy for all associates to understand our ethical standards, and to promote open communication regarding them. That’s why we have developed Humana’s Principles of Business Ethics, the successor to Humana’s Code of Business Conduct, to inform you of these standards in an easy-to-follow format.

Humana’s Principles of Business Ethics is an important part of Humana’s Ethics Plan, which is overseen by Humana’s Ethics Office. The goal of our Ethics Plan is to create a workplace climate in which ethics is so integral to day-to-day operations that ethical behavior is virtually self-enforcing. Another important part of our Ethics Plan is our toll-free Ethics Help Line, 1-877-5THE KEY (1-877-584-3539). The Ethics Help Line can help you get answers to questions regarding situations not covered in this booklet. It also provides a confidential way for associates to report instances in which they believe Humana’s Principles of Business Ethics are not being upheld, and they are not comfortable taking their concerns to their manager or Human Resources consultant.

Humana’s Principles of Business Ethics is designed to show how each associate contributes to the company’s success through ethical behavior and by “doing the right thing in the right way for the right reasons.” While the provisions set forth in this document do not cover every possible situation that may arise, you must comply with the spirit of these principles.

With your help, Humana will continue to show that maintaining high ethical standards is not simply the right thing to do, but that it is also good business.

Sincerely,

David A. Jones  
Chairman of the Board

Michael B. McCallister  
President and CEO

Jonathan T. Lord, M.D.  
Chief Compliance Officer  
Senior Vice President and  
Chief Clinical Strategy  
and Innovation Officer
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You Are the Key to Integrity

Humana’s Ethical Principles

Humana’s Principles of Business Ethics reaffirms Humana’s commitment to integrity as the cornerstone of the behavior of its associates and any others who act on the company’s behalf. As associates, it is important that we conduct ourselves in an ethical, legal and above-board manner. Our understanding of this commitment and our willingness to raise ethical concerns are essential to the well-being of our members and to the success of the company.

Honesty: Act fairly and honestly with those who are affected by our actions and treat them as we would expect them to treat us if the situation were reversed.

Compliance with Laws: Comply not only with the letter of all applicable laws and regulations, but also with the spirit of the law or regulation. Act in such a manner that the full disclosure of all facts related to any activity would reflect favorably upon the company.

Business Responsibility and You: Adhere to the highest ethical standards of conduct in all business activities and act in a manner which enhances Humana’s standing as a corporate citizen and ethical competitor within the business community. Pursue no business opportunity that requires violation of these principles.

Responsibility for Reporting Violations: You are responsible for reporting suspected ethical violations. Humana promotes relationships based on mutual trust and respect and provides an environment in which associates may question a company practice without fear of adverse consequences.

Humana’s Principles of Business Ethics is intended to be a guide to ethical behavior and not a comprehensive set of rules. You should reference the company’s other policies that require compliance.

“We judge ourselves by our intentions, but others judge us by our actions.”

Walk the Talk…And Get the Results You Want, by Eric Harvey and Alexander Lucia
Integrity Judgment Test

The guidelines in this document are meant to help all of us better understand what we believe to be in the best interest of our members, associates, shareholders, those with whom we do business, and the public at large. Ultimately, however, you are left to depend on your own individual judgment in deciding on the correct course of action.

If you are confronted with a situation that you are unsure how to handle, examine your options with this Integrity Judgment Test:
• Do my actions follow approved company practices?
• Do my actions give the appearance of being unethical or illegal?
• Will my actions bring discredit to any associate or the company if disclosed to the public?
• Do my actions, or the actions I am aware of, cause harm to individuals?
• Can I defend my actions to my supervisor or manager, other associates, and to the public?
• Do my actions meet my personal code of behavior?

Higher Responsibilities for Humana Leaders

While all Humana associates are obligated to follow Humana’s Principles of Business Ethics, we expect our leaders to set the example. They must ensure that all associates on their team have sufficient information to comply with laws, regulations, and policies, as well as the necessary resources to resolve ethical dilemmas. Humana’s leaders must help maintain a culture within the company which promotes the highest standards of ethics and compliance. This culture must encourage all associates in the organization to communicate concerns when they arise. Humana leaders are responsible for understanding and communicating the principles set forth in this document. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Q: What should I do if my supervisor or manager asks me to do something I think violates Humana’s Principles of Business Ethics, related policies, or is illegal?

A: You should immediately report the request to a level of management above your supervisor or manager, your Human Resources consultant, Humana’s Chief Compliance Officer, or the Ethics Help Line. The matter will be investigated promptly so that you can be given proper guidance.
Humana Internal Communication Process

The principles in this document are intended to reflect the collective good judgment and common sense of all Humana associates. If you become aware of a situation that violates these principles, it is important that you take one of the steps below so that the issue may be addressed. Choose the step you feel most comfortable following.

- Discuss the issue with your supervisor or manager.
- Speak to your supervisor’s immediate manager or the next level of management.
- Speak to the Human Resources consultant assigned to your area.
- Bring the issue to the attention of Humana’s Chief Compliance Officer.

Ethics Help Line (1-877-5THE KEY)

If you feel uncomfortable talking to your supervisor, manager, or other management personnel, call the confidential Ethics Help Line at 1-877-5THE KEY (1-877-584-3539). Ethics Help Line staff are available to take your calls 24 hours a day, seven days a week. The Ethics Help Line is operated by a separate company, unrelated to Humana.

You are encouraged to call the Ethics Help Line for clarification regarding, or to report any suspected violation of, a company policy or a federal, state, or local law or regulation. Also call the Ethics Help Line for assistance with ethical questions or to raise an issue you feel cannot be addressed through the communication steps listed above.

Q: Is the Ethics Help Line staffed by Humana associates?

A: No. The Ethics Help Line is staffed by specially trained, external representatives who are not Humana associates, but who are obligated to keep all Humana information confidential.

1-877-5THE KEY

Your confidential Ethics Help Line is available 24 hours a day.
Ethics Help Line staff take your calls very seriously. Calls to the Ethics Help Line are received by trained, external staff who are not Humana associates. They document and forward your information to Humana’s Chief Compliance Officer for review and determination of action. Calls may be made anonymously, and they cannot be traced or otherwise identified. If you choose to remain anonymous, Humana encourages you to provide enough information regarding the potential violation to allow the company to review the situation and respond appropriately. You will be assigned a confidential identification number to follow up on your call.

Humana also encourages associates to use the Ethics Help Line to report examples of good ethical behavior. If you become aware of a situation in which someone sets a good example by making a sound ethical decision, call the Ethics Help Line and identify that individual. Associates will be recognized for setting examples of good ethical behavior, and the situation may be cited in awareness and education programs.

Chief Compliance Officer

Humana’s Chief Compliance Officer is responsible for Humana’s Ethics Office, which has responsibility for the Ethics Help Line and Humana’s Ethics Plan. The goal of the Ethics Plan is to create a workplace climate in which ethics is so integral to day-to-day operations that ethical behavior is virtually self-enforcing.

The Chief Compliance Officer encourages any associate with suggestions or comments on improving our Humana Ethics Plan to call the Ethics Help Line at 1-877-5THE KEY (1-877-584-3539).

“Don’t say what you believe about Ethics … show what you believe.”

_The Ethics of Excellence_, by Price Pritchett
Reporting of Violations

If you become aware of a possible violation of Humana’s *Principles of Business Ethics* or any related law or policy, you should immediately report it. Contact your supervisor or manager, another managerial associate, the Human Resources consultant assigned to your area, or the Chief Compliance Officer. If the matter cannot be resolved through these channels, or if you feel uncomfortable using these channels, call the Ethics Help Line at 1-877-5THE KEY (1-877-584-3539).

No Retaliation

Humana strictly prohibits retaliation against any associate who, in good faith, reports an actual or possible violation of ethical standards. Your call to the Ethics Help Line may be made anonymously.

Investigation of Violations

Humana promptly investigates any reported potential violations of its *Principles of Business Ethics*. All reported issues are treated as confidentially as possible. You are expected to cooperate fully in any investigation of an alleged violation. If you wish to remain anonymous, please provide enough information to allow Humana to investigate the issue.

Discipline for Violations

Associates should do what is permissible, acceptable, and expected. That means using common sense, good judgment and exhibiting proper behavior. Violation of Humana’s *Principles of Business Ethics* could compromise Humana’s integrity and reputation, and will result in disciplinary action, up to and including termination of employment. The following are examples of conduct that may result in disciplinary action:

- Authorization or participation in actions which violate Humana’s *Principles of Business Ethics*.
- Failure to report a violation of the *Principles of Business Ethics*.
- Refusal to report a violation of the *Principles of Business Ethics*.
- Refusal to cooperate in an investigation of an alleged violation of the *Principles of Business Ethics*.
- Failure by a violator’s supervisor or manager to detect and report a violation of the *Principles of Business Ethics*, if such failure reflects inadequate supervision or lack of oversight.
- Retaliation against an individual for reporting a violation or possible violation of the *Principles of Business Ethics*. 

Q: What will happen if someone deliberately makes a false report in order to get me into trouble?

A: All investigations are handled professionally and without prejudice. Intentionally making a false accusation is a serious violation and may lead to disciplinary action, up to and including termination of employment.
Business decisions and actions must be based wholly on the best interests of Humana and must not be motivated by personal considerations or relationships. Generally speaking, associates and family members should not engage in activities that compete with any of Humana’s lines of business, provide services or assistance to a competitor, or interfere with the performance of job duties. A good general rule is to avoid any action or association that would be embarrassing to you or Humana if it were disclosed to the public.

Associates are required upon hire to complete a Conflict of Interest Form disclosing any activity which may constitute a conflict of interest with Humana. Any activity or interest that is questionable should be disclosed. Approval will be granted to engage in those activities which, in the view of company management, do not create a conflict of interest. Conflict of Interest Forms should be updated to reflect any current potential conflicts. This is an ongoing duty of all Humana associates.

**Outside Employment and Activities**

You may not provide services to any business entity that competes with Humana. In addition, you generally may not accept compensation for services performed for Humana outside of your regular job, except when those services have been disclosed to and approved by Humana. A conflict of interest may arise if your potential outside employment activities impair your business loyalty and effective performance for Humana. You must inform your immediate supervisor or manager if you plan to take employment outside Humana so the company can determine if such outside employment could constitute a potential conflict of interest.

You must ensure that any outside activity is strictly separated from your Humana employment. Doing outside work on company time or using any Humana resources, including computer systems or personnel, is unacceptable and may lead to disciplinary action, up to and including termination of employment.

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**Q:** I believe one of our sales associates is working for a Humana competitor on the side and stealing Humana customer information. What should I do?

**A:** This is an immediate threat to Humana and a conflict of interest. Immediately notify your supervisor or manager, Human Resources consultant, Humana’s Chief Compliance Officer, or the Ethics Help Line at 1-877-5THE KEY (1-877-584-3539).
Business Affiliations and Financial Investments and Opportunities

A business affiliation or financial investment that compromises your independent judgment or work at Humana is a conflict of interest. The term “financial investment” means stock, options to buy stock, or other ownership interest in an entity.

Humana strongly discourages investing in a Humana competitor. In addition, you should not invest in current or prospective Humana vendors, suppliers, or companies with which Humana is contemplating a transaction, if you are making, or will be required to make, recommendations or decisions relating to the purchase or evaluation of products, services, or the merits of a transaction from that particular vendor, supplier, or company.

Associates also are prohibited from directly or indirectly buying, leasing, or otherwise acquiring rights to any property or materials if you believe that Humana also may be interested in pursuing such an opportunity. You should notify your supervisor or manager of any business opportunity of which you become aware through your position with Humana.

Communications with the Media or Outside Persons or Entities

All public statements or acts must be carefully thought out and personal views kept separate from corporate views. All inquiries from the news media must be directed to the Corporate Communications Department to be addressed by Humana’s designated spokesperson. If you receive a call or request from the news media, do not engage in any conversation, but immediately direct the call to the Corporate Communications Department.

Inquiries from financial analysts and stockholders should likewise be referred to Humana’s Investor Relations Department. When communicating regarding matters not involving Humana business, you should separate your personal roles from your position with Humana. Do not use Humana stationery or titles in communications involving non-Humana business, especially when expressing personal views on political or controversial matters or for fundraising.
of any kind other than company-approved charitable activities. In addition, you should clearly state that any opinions you express are your own, and not those of Humana.

**Political Contributions and Activities**

The company encourages associates to participate in our country’s political process as they so desire. You may make personal political contributions or communicate your personal beliefs to elected officials. Federal law and company policy prohibit employees from being reimbursed for their personal political contributions. Personal compensation will not be altered in any way, under any circumstances, to reflect such contributions.

It is important to distinguish between personal and corporate political activities. As a responsible corporate citizen, Humana occasionally speaks out on issues of importance to the company. Senior management is responsible for developing the company’s positions on relevant legislative and regulatory issues.

Unless you are specifically requested by the company to represent it before legislative or other governmental bodies, be sure you clearly label any personal communication with legislators as your own beliefs. If legislators or regulators contact you regarding the company’s position on public issues, you should refer them to the Government Affairs Department.

No associate may make any contribution on behalf of Humana, or use the company’s name, funds, staff, property or services for the support of political parties or candidates unless the contribution is permitted by law and is authorized in advance by Humana’s Government Affairs Department.

No one at Humana may pressure another associate to express a political view that is contrary to his or her personal view, or to contribute to a political action committee, political party or candidate, or charitable organization.

As permitted by law, Humana uses corporate funds to administer a political action committee. The Humana Political Action Committee is formed and operated by participating Humana associates to

**Q:** My sister would be a great supplier for Humana. Can I purchase from her?

**A:** You can’t personally purchase from her or have direct or indirect influence over purchasing decisions involving her. The potential for an appearance of conflict of interest is too great. However, if you are totally removed from Humana’s purchasing decisions in her business area, you may introduce her to the appropriate person within Humana.
distribute contributions to candidates for federal and state elected offices. Associates’ contributions to the Humana Political Action Committee are strictly voluntary. The Humana Political Action Committee does not contribute company funds to candidates.

If you plan to run for political office of any type, contact the Government Affairs Department to assess whether any potential conflict of interest exists. Holding a political office must not interfere with the satisfactory performance of your job duties and should not conflict with your responsibilities to Humana.

Lobbying

Associates authorized by the company to make contact with members of legislative bodies and other officials to advocate for the company are expected to abide by all applicable laws at all times. No associate should engage in lobbying without authorization from the Humana Government Affairs or Law Departments. Written authorization must be obtained from the Government Affairs Department and the offices of both the Chief Financial Officer and the General Counsel prior to engaging any lobbyist, outside legal counsel or consultant to lobby for, or otherwise promote, Humana’s interests on any legislative, regulatory or other governmental issue.

Community Involvement and Board Memberships

Humana strives to be a responsible corporate citizen in the communities and areas in which it operates. The Humana Foundation, a non-profit organization, provides financial support to organizations that improve the quality of life in communities where Humana has a business presence. The community leadership offered by thousands of Humana associates is another example of long-standing civic commitment.

Humana encourages you to participate in community activities. However, in the conduct of your personal affairs, you should clearly state that your views and actions are your own, and not those of Humana. You also should ensure that your outside activities do not interfere with your job performance and do not constitute a conflict of interest with Humana.

Q: May I sit on the board of directors for the local history museum?

A: You may serve as a board member for a community organization. However, you should notify your supervisor or manager first to ensure these activities do not create a conflict of interest with your job and that you would not be participating in decisions regarding Humana and its services.
As a Humana associate, you are permitted to serve on the boards of directors of community or other organizations, or donate volunteer time, if the activity does not diminish your ability to perform your duties for Humana. However, to ensure there is no conflict of interest, you must notify your supervisor or manager about the board membership and complete or update a Conflict of Interest Form.

**Participation in Professional Societies and Vendor Seminars**

Humana encourages you to broaden your knowledge and competence by participating in job-related professional society meetings, seminars, and other similar events. You are asked to use good judgment, however, in serving as a speaker or technical expert, or in any other capacity that involves payment for participation, whether as an honorarium or in the form of travel and lodging. Since Humana is concerned about the appearance of conflicts of interest, you should obtain approval for your plans in advance from your supervisor or manager. Also, you should report stipends, fees, grants, or other payments from professional or other groups to your supervisor so a determination can be made as to whether the funds should be retained by Humana.

**Updating Conflict of Interest Forms**

If your disclosures on your Conflict of Interest Form become inaccurate or incomplete because of a change in circumstances, immediately complete and submit a new form, detailing the change. The appropriate Human Resources consultant will review all forms disclosing information regarding a potential conflict of interest, and refer to senior management for review.

“Values are how you act if no one is around and no one would know the difference.”

*Ethics Matters - How to Implement Values Driven Management,*
by Dawn-Marie Driscoll and W. Michael Hoffman
Q: One of our suppliers gave me a small fruit basket during the holidays. Was it okay to accept it?

A: Accepting gifts under $25 from non-governmental employees is permitted as long as they don’t appear to obligate or influence you or Humana. In this case, why not share the fruit with other associates?

Gifts, favors, travel and entertainment may create a conflict of interest with your obligations to Humana and may constitute a violation of law.

Gifts
Generally, you should not provide or accept gifts of more than nominal value — as a rule of thumb, no more than $25. In addition, Medicare’s marketing guidelines allow nominal giveaway items for prospective members only if the value does not exceed $10. Any nominal courtesies or gifts received must be lawful, unsolicited and infrequently provided. Gifts of money or cash equivalents are never permissible. You should not give gifts, meals, favors, or travel and entertainment to vendors, suppliers, customers, or others without the consent of senior management.

No Gifts, Meals or Gratuities for Government Employees
As a general rule, you may not provide or pay for meals, refreshments, travel or lodging expenses for government employees. Government employees generally must pay their fair share whenever company and government personnel participate in a joint endeavor. For example, if traveling from the airport to a common destination, the fare should be shared. If business extends over the noon hour, you must make arrangements for the government personnel to pay for their own lunch.

Very strict guidelines prohibit giving any type of gratuity or anything of value to federal and some state employees. Your strict compliance with these guidelines is required. Other state and local governments may have more flexible rules regulating the acceptance of business courtesies, such as meals and refreshments, which, of course, you must observe.

Both company policy and laws could be violated if anything of value is given to a government employee, even if there is no intent to influence an official action or decision. Therefore, no employee should entertain a public official or otherwise engage in lobbying efforts without authorization from Humana’s Government Affairs Department or Law Department.
Favors and Discounts
You may not accept discounts on personal purchases of products and services of a vendor, supplier, or customer unless such discounts are offered to Humana associates in general through a company-approved program. You should also never solicit or accept favorable treatment on loans or other services unless they are similarly broadly available through an approved program.

Travel and Entertainment
Humana pays all reasonable expenses for your business trips, in accordance with its Expense Reimbursement and Travel Policy. Generally, trips should not be financed by anyone with whom you are doing business, or contemplating doing business, without approval from your supervisor or manager. On occasion, accompanying a business contact to a cultural or sporting event or business meal, or attending a holiday or celebration function of a vendor, supplier, or customer may be acceptable. In no event will you be reimbursed for expenses incurred in establishments which could be offensive to some and which are not suited for general business, such as adult entertainment establishments, or establishments which are known to discriminate based on race, sex, national origin, religious preference, age, sexual orientation or disability.

Q: I am considering buying a piece of equipment for my department. The vendor I am negotiating with has offered me a computer and software at a discount for my personal use if I sign a contract for the equipment. The purchase price of the equipment is reasonable and I really need the computer. Is this allowed?

A: No. Humana does not allow its associates to accept discounts or other gifts in exchange for signing contracts or doing business with a company or vendor.
Marketing Practices

Q: I'm a Medicare Sales Representative and learned during a recent visit that a prospective member may have a chronic health condition, but has not yet seen a doctor. Am I required to enroll this person?

A: Yes. You are required to enroll all eligible Medicare beneficiaries regardless of age, health status, or cost of services needed (unless otherwise regulated, such as End Stage Renal Disease.)

Marketing and Advertising Practices

Humana is engaged in the advertising, marketing and sale of various insurance and managed care products, both to employer groups and to individuals. Humana associates must accurately represent products, services, benefits and prices when engaging in marketing and sales efforts and should always do so with integrity. All marketing materials should be carefully reviewed to assure that statements are factual and not misleading.

Medicare+Choice plans are required to enroll all eligible Medicare beneficiaries regardless of age, health status, or cost of health services needed, unless otherwise regulated (such as End Stage Renal Disease). Sales representatives and other associates must not discriminate on the basis of the health status of individuals when enrolling beneficiaries. This means that no prospective member may be asked questions concerning health status, and no medical screening of any kind may be performed. A Health Risk Assessment (HRA) can be done after enrollment to place the member in an appropriate disease or medical case management program. It also means ensuring that sales to Medicare beneficiaries take place in settings that are accessible to persons of all health statuses.

Similarly, any efforts to encourage disenrollment of any Medicare or Medicaid beneficiary because of the individual's health status are strictly prohibited. The Health Care Financing Administration (HCFA) also has published guidelines for use by Medicare+Choice plans in marketing to beneficiaries. These guidelines should be strictly followed.

Any reported violation of these requirements will be promptly investigated, and immediate disciplinary action, up to and including termination, will result if a violation is found.
Sales Practices

Each sales representative must adhere to all applicable state laws, and those selling to Medicare- and Medicaid-eligible individuals must adhere to HCFA regulations as guidelines for honest marketing practices. Each Humana Medicare sales representative is required to read and sign a separate code of ethics relating to sales practices before becoming authorized to act on behalf of Humana. This code of ethics is designed to assure that representatives use no form of deception or other unethical sales tactic in their presentations and is to be considered an extension of Humana’s Principles of Business Ethics.

Anti-Kickback Laws

The federal anti-kickback laws that apply to Medicare and Medicaid prohibit persons or entities from knowingly offering, paying, soliciting or receiving remuneration of any kind to induce the referral of business under a federal program. In addition, most states have laws that prohibit kickbacks and rebates.

Also related to marketing to Medicare enrollees, health plans are specifically prohibited from providing any kind of remuneration to entice beneficiaries to join our plans, although the government recognizes that providing very nominal items (defined as having a value of $10 or less) in the course of marketing activities is acceptable.

“Excellence never happens by accident, we have to make it happen.”

The Ethics of Excellence, by Price Pritchett
Assuring Integrity of Company Information

Assuring the Accuracy of Information
Humana is committed to providing accurate and truthful information in all transactions. This commitment is reinforced by internal controls and procedures developed to assure that all reports and records of all types are accurate and reliable. All associates, within their areas of responsibility, are expected to adhere to the proper policies and procedures and to help assure the integrity of any report we create. This applies to internal reports as well as reports prepared for external use. Any associate having a question concerning the accuracy of a report must resolve such question before the report is submitted.

Because we are in a very highly regulated industry, we provide reports on a regular basis to various state and federal agencies, as well as accrediting bodies. It is imperative that all of these reports be accurate in all respects. Appropriate audits will be conducted to test the ongoing accuracy of these reports. However, it is imperative that all associates be aware of the need for accuracy and report immediately any inaccuracy.

Safeguarding Confidential and Proprietary Information
Humana and its associates have access to highly confidential information, which must be safeguarded to prevent inappropriate disclosure and unwarranted invasion of the rights to privacy of our associates, members and providers. Unauthorized disclosure of or access to confidential or proprietary information may result in disciplinary action, up to and including termination of employment.

To prevent inadvertent disclosure of confidential or proprietary information to unauthorized persons, you should follow these information security procedures:

- Adopt a “clear desk” habit for confidential or proprietary documents. Such documents, when left in view on a desk overnight or while away from your office for lunch, meetings, or other activities, provide a perfect opportunity for unauthorized persons to acquire information they should not have and which
could be detrimental to the company or individuals. Secure all sensitive information in locked offices, desks or file cabinets when not in use.

- At a minimum, use a screen saver password protection on your PC so that others may not access data on your computer while you are temporarily away.

- Secure laptop computers in locked offices, desks, or file cabinets each night or when away from your desk for prolonged periods of time.

Customer Information
Humana’s business requires that we gather a great deal of personal information about individuals. Therefore, we must carefully avoid any unwarranted invasion of the rights to privacy of our members.

For this reason, and to ensure the accuracy of the information we retain, all associates must follow the guidelines below.

- Protect the confidentiality of the customer. Do not misuse any information that specifically identifies the individual. Limit the access of such information to Humana associates, agents and other persons and organizations with a legitimate insurance- or health-related need to know, unless required by law or the individual provides express written consent to release the information.

- Use legitimate means to collect only the information you need to know and, whenever practical, obtain it directly from the individual concerned.

- Let individuals know what items of information may be gathered for marketing, research or other purposes not directly related to establishing their eligibility for a health care benefit and specify whether any may be used for such purposes in a way that could identify them.

- Do not use the customer identification information in a fraudulent or inappropriate manner. You must have a legitimate business purpose for accessing the information.

Q: My child’s friend at school is rumored to have a contagious disease, which I fear my child may contract. I have access to the Claims Administration System for my job. Can I look up my child’s friend’s medical information to see if she has been treated for a contagious disease?

A: No. You have no legitimate business purpose for accessing the member information. It would be an inappropriate use of Humana member information.
Humana Information

Failure to adequately protect confidential information may place Humana at a competitive disadvantage in the marketplace. Because of this risk of harm, you should not use for your own benefit, or disclose to others, any confidential information obtained during the course of employment, without the written consent of Humana, during your employment or anytime thereafter, other than as may be required by law or in the ordinary course of Humana’s business. The obligation to keep Humana information confidential continues after your termination of employment.

Confidential information includes, but is not limited to, Humana methods, processes, techniques, computer software, equipment, research data, clinical and pharmacological data, marketing and sales information, associate data, customer lists, financial data, business plans and all other trade secrets which are in the possession of Humana and which have not been published or disclosed to the general public. (See also “Insider Information and Securities Trading.”)

Requirement of Signed Confidentiality Agreement

All associates and others who have access to Humana confidential information must sign a Confidentiality Agreement when beginning a relationship with Humana, and on an annual basis, and must strictly adhere to its provisions.

Insider Information and Securities Trading

As a publicly traded company, Humana provides full and fair public disclosure on a timely basis of any activities which would materially affect the value of Humana’s stock, options or any of its securities.

In the normal course of business, some associates may have access to information about these activities before it becomes public knowledge. Until it is released to the public, this knowledge is considered “insider” information and must be kept confidential. This applies to information concerning Humana or any other corporation or business about which associates obtain such information. Acting on this information for personal gain, or releasing it to anyone else prior to its effective disclosure to the general public, is a violation of federal law and Humana policy.

Q: I’m a good friend of a salesperson for a competitor. When we go out for dinner we often trade tales about the managed care industry and the latest marketing plans our companies are planning to roll out. Is this okay?

A: No. Humana has invested significant resources in the confidential marketing plans you are revealing, so you may be divulging Humana’s proprietary information. In addition, a discussion of marketing and pricing with any competitor’s representative may appear to be collusion and therefore may be a violation of antitrust laws. You should call Humana’s Chief Compliance Officer or the Ethics Help Line (1-877-5THE KEY) for clarification of what is appropriate to discuss.
Insider information is considered “material” if there is a substantial likelihood that you or another reasonable investor would consider the information important in deciding whether or not to buy, sell or hold Humana’s stock, options or other Humana securities. Specific examples of “material” information generally include unanticipated changes in annual and quarterly earnings or dividend rates, stock splits or dividends, significant acquisitions, reorganizations, proposed tender offers, and senior management changes. Information regarding major new products, contract awards, expansion plans, or significant litigation or regulatory proceedings may also fall in the category of “material” information. You may not act on this information or release it to anyone else, including relatives, friends, colleagues or stockbrokers, until the information has been disclosed publicly and the public has had time to react to it.

If you obtain access to non-public, material information about the organization while performing your job, you may not discuss this type of information with anyone outside of Humana. Within Humana, you should discuss this information on a strictly “need to know” basis only with other colleagues who require this information to perform their jobs. You may not use the information to buy, sell, or retain securities of Humana or any other company. Even if you do not buy or sell securities based on what you know, discussing the information with others, such as family members, friends, vendors, suppliers, and other outside acquaintances is prohibited until the information is considered to be public.

Creating and Retaining Business Communications

Almost all business records and communications may become subject to public disclosure in the course of litigation or government investigations. Business communications are also often obtained by outside parties or the media. Associates should therefore attempt to be as clear, concise, truthful and accurate as possible when creating any information. Avoid using exaggeration, colorful language, speculation, legal conclusions and derogatory characterizations of people or their motives.

Treat electronic messages and other documents stored in a computer as you would paper documents. Business documents in the electronic files of associates are generally subject to disclosure if so required by law.
All member, business, and associate documents and records are retained in accordance with the law and Humana’s Record Retention Policy. Pertinent records include, but are not limited to, member, business, and associate documents including paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain or destroy records appropriately according to Humana policy. Records should not be tampered with, removed, or destroyed prior to the specified date. If litigation, an audit or a government investigation is pending, do not destroy any related records. You are encouraged to request a copy of the Record Retention Policy from your supervisor if you have questions regarding record retention.

Information Systems and Equipment - Communications and Information

Computer and other electronic and telecommunications information systems play a vital role in Humana’s business operations. Humana has an obligation to ensure that information systems and equipment are used appropriately and that proprietary or confidential information is protected. All associates must assist in protecting these systems, including hardware and software, data, information, and equipment as outlined in the Information Security Agreement that each associate and all others who have systems access must sign and abide by.

Specifically, associates and other systems users must use e-mail, Internet, Intranet, voice mail, telephone and other telecommunications equipment, and computer systems and equipment primarily for business purposes. Inappropriate use of these media, while on Humana premises or with the use of Humana equipment or remote access software, is strictly prohibited. Inappropriate use includes, but is not limited to, possessing, transmitting, printing, loading, or downloading obscene, pornographic, profane, sexually explicit, violent, threatening, or offensive communications or materials. Offensive communications or materials include, but are not limited to, sexual
Q: When I was on vacation, my supervisor accessed my e-mail system. I had several personal messages that she may have seen. Does she have the right to access my e-mail system without my permission?

A: Yes. Humana reserves the right to review your e-mail for any reason. Your company e-mail accounts belong to Humana and should be used primarily for Humana business.

Inappropriate use also includes the unreasonable amount of use of e-mail, Internet, voice mail, telephone and other telecommunication equipment, and computer systems and equipment for non-business purposes. If you receive any type of inappropriate communication, refer to the Information Security Agreement and policy to report the incident. Misuse of Humana systems and equipment may result in disciplinary action, up to and including termination.

Associates and others with access to Humana systems and equipment must keep strictly confidential passwords assigned to allow access to equipment in order to minimize the exposure of proprietary or confidential information and to maintain the integrity of Humana systems.

Humana reserves the right to access, read, copy, delete, monitor, and disclose all information on e-mail, voice mail, or computer systems and equipment. Associates and others who have access to such systems should not use the systems and equipment to send, receive, or store information which the user wishes to keep private. These systems and equipment are Humana property and records, and should be used primarily for business purposes.

No one with access to Humana information systems and equipment may violate the laws and regulations of the United States or any other nation in their use of Humana’s Internet and computer facilities.

**Requirement of Signed Information Security Agreement**

All associates and others who have access to Humana information systems and equipment must sign an Information Security Agreement when beginning a relationship with Humana and must strictly adhere to its provisions.
Contracting with the Government

As a government contractor, Humana complies with various federal and state laws which impose stringent requirements. It is essential that there be strict compliance with all laws and regulations in transacting business with the government. The terms of contracts with the government require explicit compliance. While we are always vigilant about providing correct data, extra care should be used in preparing cost or pricing data which will be submitted to the government.

Humana associates who deal with government officials and contracts are responsible for knowing and complying with applicable laws and regulations. Questions concerning doing business with the government should be directed to the Law Department or the Chief Compliance Officer.

No Gifts, Meals or Gratuities for Government Employees

See the section in this document entitled “Gifts, Favors, Travel and Entertainment.”

Procurement Integrity Act

The Procurement Integrity Act prohibits Humana, as a federal contractor, from:

• Receiving contractor bid or proposal information which would give Humana an unfair competitive advantage;

• Giving anything of value to a procurement official; or

• Discussing or making an offer of employment to a federal government or military procurement official. Some procurement officials have a two-year ban, and some have a lifetime ban, on employment discussions with Humana.

Violations of the Act committed by contractors or their employees are punishable by fines and imprisonment, loss of government contracts, and/or suspension or debarment from participating in federal procurement opportunities.
Humana’s policy is to avoid even the appearance of impropriety. We comply with the Act in all respects. For more information about the Act, contact the Humana Military Healthcare Services Director of Human Resources or the Humana Law Department.

**Hiring Former and Current Government Employees**

The government has created specific rules to eliminate even the appearance of a conflict of interest by former government employees who work for government contractors. You should obtain clearance from the Law Department or the Humana Military Healthcare Director of Human Resources prior to discussing the employment or possible retention as a consultant of any current or former government employee.

**Dealing with Government Agencies**

Humana’s Law Department should be informed of all notifications of a violation or citations alleging a violation from a governmental regulatory agency. The person receiving the notification should direct the request to the Law Department.

You must never:

- Destroy or alter any document or record in anticipation of a request for the document or record by a government agency or court;

- Lie or make false or misleading statements to any government investigator; or

- Persuade any associate, or any other person, to provide false or misleading information to a government investigator.

**Doing Business with Accrediting Agencies**

Humana associates are responsible for abiding by the standards of those outside accrediting agencies that accredit our plans to provide accurate information in a timely manner. You must deal with all accrediting agencies in a direct, open and honest manner. No action should ever be taken in relationships with accrediting agencies that would directly or indirectly mislead the agency.
Equal Opportunity and Affirmative Action

Humana provides equal employment opportunity for all individuals without regard to race, color, religion, sex, national origin, age, sexual orientation, disability or veteran status.

Humana is committed to the practice of equal employment opportunity. Our policy is to provide equal opportunity for all associates and applicants for employment as defined by federal, state, and local laws.

Specifically, Humana:

- Recruits, hires, trains, and promotes persons in all job groups without regard to race, color, religion, sex, national origin, age, sexual orientation, disability or veteran status;

- Administers other personnel-related activities without regard to race, color, religion, sex, national origin, age, sexual orientation, disability or veteran status. These activities include compensation, benefits, promotions, transfers, layoffs, returns from layoff, company-sponsored training, educational assistance, and social and recreational programs; and

- Encourages a culturally diverse work force and bases employment decisions on principles that promote equal employment opportunity.

All managers are responsible for ensuring that nondiscrimination prevails throughout every aspect of employment.

To strengthen its commitment to equal employment opportunity, Humana has established an Affirmative Action Compliance Program which strives to ensure that minority and female representation in all job classifications is proportionate to the number of qualified minorities and females in each recruitment area. As a federal contractor, Humana prepares and implements annual, written affirmative action plans. To learn more about Humana’s Affirmative Action Compliance Program, contact the Manager of Equal Employment Opportunity/Diversity Advancement.
Individuals Ineligible for Employment

As a health care insurer, Humana is subject to strict governmental regulation and oversight. The government requires that Humana refrain from hiring or contracting with individuals who have engaged in certain types of activities. Individuals will be ineligible for hire or continued employment or any contractual relationship if they have been:

• Convicted of a criminal offense related to health care; or
• Listed as debarred, excluded or otherwise ineligible for participation in federal health care programs.

In addition, Humana is subject to the Violent Crime Control and Law Enforcement Act of 1994 which makes it a felony crime for Humana to hire or contract with an individual who has ever been convicted of any criminal felony involving dishonesty or a breach of trust. These individuals will be ineligible for hire or continued employment at Humana or for any contractual relationship.

Harassment

Humana does not tolerate any type of harassment of its associates, including harassment based on factors protected by federal, state or local law. These factors include race, color, religion, sex, national origin, age, sexual orientation, disability, veteran status, or marital status. This specifically includes, but is not limited to, sexual harassment. The harassment in question may not be considered a violation of the law but may still constitute a violation of Humana policies. Any associate who violates this policy may be subject to disciplinary action up to and including termination.

Harassment by or of another associate, a contractor, vendor or anyone else on Humana premises or in the course of Humana business is absolutely prohibited. Humana does not tolerate any situation where an associate’s submission to harassment is made either explicitly or implicitly a term or condition of employment; is used as a basis for employment decisions; or where harassment has the effect of creating an intimidating, hostile or offensive working environment. See Humana’s Harassment Policy for examples or forms of harassment and for further detail.
Humana’s Harassment Policy applies to everyone – including all associates and applicants, as well as those having contractual relationships with Humana and any others on Humana premises. Humana’s policy is to exercise reasonable care to prevent any harassment and, if such misconduct occurs, to investigate and take prompt and effective remedial action – no matter who it involves.

All associates have the responsibility to promptly bring to management’s attention any incidents believed to constitute harassment against the associate or anyone else. Associates may complain or make a report about harassment to their supervisors or managers, Human Resources consultant, Associate Relations representative, or the Ethics Help Line. Upon receiving a complaint, Human Resources conducts a prompt and thorough investigation of the allegations.

All associates must cooperate with the investigation process. Humana will make reasonable attempts to protect the confidentiality of complaints and investigations. At the conclusion of harassment investigations, Humana will take appropriate corrective and remedial action, up to and including the termination of any associates who violate this policy.

Humana strictly prohibits retaliation against any associate who makes a complaint of harassment or who is involved in the investigation process. All associates must immediately report incidents believed to be retaliatory to management, their Human Resources consultant, Associate Relations representative, the Chief Compliance Officer, or the Ethics Help Line.

**Drug- and Alcohol-Free Workplace**

It is Humana’s policy to attempt to create a drug-free workplace in keeping with the spirit and intent of the Drug-Free Workplace Act. The unlawful use of controlled substances and the misuse of prescription drugs are inconsistent with the behavior expected of associates. Illegal drug use subjects all associates and visitors to our facilities to unacceptable safety risks, and undermines Humana’s ability to operate effectively and efficiently. Reporting to work while under the influence; unlawful manufacture, solicitation, distribution, dispensing, possession, sale, or use of a controlled substance; or the misuse of prescriptions in the workplace or while engaged in company
business off Humana premises is strictly prohibited at all times. Humana also reserves the right to impose disciplinary action, up to and including termination, for off-the-job (non-working time) illegal drug use. Off-the-job use could adversely affect an associate’s job performance or could jeopardize the safety of other associates or the public. Off-the-job illegal drug use could also jeopardize customers’ or the public’s confidence in Humana and its associates.

Other than at company-sponsored or approved functions, alcohol consumption is prohibited at any time on Humana property and is prohibited during working time. Aside from company-sponsored or approved functions, anyone who consumes alcohol on Humana property, or who comes to work while under the influence of alcohol, will be subject to disciplinary action, up to and including termination.

You are encouraged to become aware of the dangers of drug and alcohol abuse. Humana offers the Employee Assistance Program (EAP) to help you obtain information about these dangers and how to maintain healthy lifestyles. You may voluntarily request help in dealing with a drug or alcohol problem by participating in the EAP. For information or help, contact the EAP directly at 1-800-289-6768. While Humana encourages you to use the EAP, an associate who has already violated Humana policies is not protected from appropriate disciplinary action by voluntary use of the EAP.

Current associates may be required to submit to a drug or alcohol test when there are reasonable grounds to believe that their job performance is impaired due to use of drugs or alcohol. Failure to immediately participate in the drug or alcohol screening under these circumstances will result in immediate termination of employment.

All Humana facilities have implemented drug screening during the pre-employment process. A prospective associate whose drug test is confirmed positive will not be offered employment.

If you are convicted of a violation of any criminal drug statute, where such violation occurred on the job or on company premises, federal law requires that you notify your Human Resources consultant no later than five days after such conviction. See Humana’s Drug and Alcohol Policy for more information.
Associates who violate any aspect of Humana’s Drug and Alcohol Policy may be subject to disciplinary action, up to and including termination of employment.

Personal Use of Company Resources
Humana entrusts all associates with numerous company assets, including financial assets, buildings, equipment, supplies, and the time it pays associates to work. Each associate is expected to use company assets in an honest manner and only for company purposes, unless authorization for other uses is obtained in advance, and to protect assets from loss, damage, misuse or theft. For example, using the Internet or e-mail excessively for significant non-business purposes is unacceptable.

If you become aware of any improper use of resources you should immediately notify your supervisor or manager, Human Resources consultant, Humana’s Chief Compliance Officer, or call the Ethics Help Line.

Personal or Familial Relationships with Other Associates
No associate shall supervise a relative or other person with whom the supervisor has a personal relationship where such relationship creates the potential for conflict. When marriage, transfer or other circumstances bring associates into a situation in which a potential for conflict exists, one of the associates must transfer or resign within 30 days.

Relatives are considered to be:
• By blood: parent, child, grandparent, grandchild, brother, sister, half brother, half sister;
• By marriage: husband, wife, stepparent, stepchild, stepbrother, stepsister, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law, daughter-in-law; and
• Any other family member of the associate or his or her spouse.

Q: I am aware that two people in my department record more hours on their timesheet than they actually work. I believe this is wrong but don’t know what to do about it.
A: Deliberately recording incorrect hours on timesheets is unethical and a violation of company policy. You should contact your manager or supervisor, Human Resources consultant, Chief Compliance Officer, or call the Ethics Help Line (1-877-5THE KEY).
Licensure and Certification Renewals
Associates who fill some positions are required to be licensed or certified by state agencies. Associates in positions requiring licensure are responsible for keeping their licenses or certificates current and in effect. No associate may be employed in such a position without the necessary license or certification.

Environmental Responsibility
Humana is committed to conducting its business operations in an environmentally responsible manner and in compliance with all applicable environmental laws and regulations. Associates are expected to support this commitment by:

• Operating in full compliance with both the letter and the spirit of environmental, health and safety laws and regulations;
• Encouraging care and regard for the environment among fellow associates and in the community;
• Reporting any environmental, health, and safety problems to supervisors;
• Identifying opportunities to improve environmental, health and safety programs; and
• Implementing emergency preparedness plans if necessary.

Workplace Violence
The safety and security of associates, customers, visitors, or others on Humana premises is vitally important. Humana has a zero-tolerance policy toward threats, threatening behavior, acts of violence, or possession of weapons in the workplace and is proactive in its commitment to create and maintain a violence-free workplace.
Workplace violence is any physical assault, threatening behavior or verbal abuse occurring in the work setting, including, but not limited to:

- Threats of any kind;
- Physical contact or threatening, physically aggressive, violent or intimidating behavior;
- Behavior that suggests a propensity toward violence, including belligerent speech, sabotage or threats of sabotage of Humana property;
- Defacing or causing physical damage to Humana property or premises; or
- Bringing weapons or firearms of any kind on Humana premises, or while conducting Humana business or engaging in company-related activities, or threatening to use weapons against other associates, the company or other parties.

Humana prohibits firearms or weapons of any kind on Humana property or premises, including parking facilities and company-owned vehicles. Anyone carrying a firearm or weapon, except for law enforcement officers in the performance of their duty, must leave Humana premises until they are no longer in possession of the weapon. Weapons include guns, knives, explosives and other potential weapons. Humana has the right to inspect any person or any person’s property on company premises and any company property for weapons, including but not limited to desks, personal bags, brief cases, company vehicles and personal vehicles parked on company premises.

All associates are responsible for reporting threats witnessed or received by themselves, another associate, customer, visitor, contractor, vendor or any other person who is on Humana premises or who is engaging in a company-related activity. Associates must notify a Human Resources consultant and Building Security immediately. The Human Resources consultant should report all incidents to the Corporate Director of Security, Associate Relations and Risk Management. If Building Security or Building Management is not promptly available, dial 911 if an immediate emergency involving

Q: I’m a supervisor, and one of my associates told me that another associate threatened to harm him. How do I handle reports of violence?

A: Notify your manager, and call Building Security and your Human Resources consultant immediately. If it is not an immediate threat of harm, you may also call the Ethics Help Line (1-877-5THE KEY).
actual or threatened violence exists. Report as much detail as possible (name, location, floor, etc.) so that an appropriate emergency response can be initiated. In addition, notify your supervisor as soon as possible.

All reports of workplace violence will be taken seriously and will be promptly and thoroughly investigated. Anyone who makes threats, exhibits threatening behavior, or engages in a violent or threatening act on Humana premises will be removed from the premises by Human Resources, Building Security or management, if appropriate, as quickly as safety permits and must remain off Humana premises pending the outcome of an investigation. If an associate engages in acts or threats of violence on Humana premises, the associate may be subject to termination, arrest, and prosecution.

Associates may report all violent acts or threats of violence without fear of reprisal.

“Trust is like the air we breathe. When trust is present, it’s never noticed. When it’s missing, it’s all that’s noticed.”

_Ethics Matters – How to Implement Values Driven Management_,
by Dawn - Marie Driscoll and W. Michael Hoffman
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Thank you for reading Humana’s
Principles of Business Ethics.

If you have ethical questions or concerns, please
contact your supervisor or manager, another member
of management, your Human Resources consultant,
Humana’s Chief Compliance Officer, or call the
Ethics Help Line (1-877-5THE KEY).

Remember…

**You Are the Key to Integrity!**
Additional Resources

Department Contacts

Associate Relations Department ................................................................. 502-580-3364
Chief Compliance Officer ................................................................. 502-580-3060
Corporate Communications Department ............................................ 502-580-3637
Employee Assistance Program .............................................................. 800-289-6768
Government Affairs Department .................................................... 502-580-3994
Human Resources Department ............................................................. 502-580-2552
Humana Main Switchboard ................................................................. 502-580-1000
Humana Military Health Services - Human Resources Department .... 502-580-3448
Internal Audit Department ................................................................. 502-580-1065
Investor Relations Department ......................................................... 502-580-3622
Law Department .............................................................................. 502-580-2750
Special Investigations Department .................................................... 502-580-8010

Other Resources

Associate Resource Guide

Humana Intranet –
  Human Resources - Associate Information - Policies and Procedures
  Corporate Policies and Procedures – Humana’s Principles of Business Ethics

The telephone numbers listed above may be subject to change.