
UnitedHealth Group's

Principles of Integrity & Compliance

Your Guide to Business Conduct



UnitedHealth GroupSM

FROM THE CEO

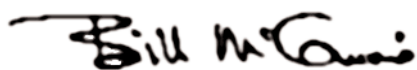
Dear Colleagues:

UnitedHealth Group is committed to the highest standards of integrity. As one of the country's most admired companies, our reputation is one of our most valued assets. Participants, customers, regulators, providers, investors and others expect honesty and integrity from us. These qualities are included in our core values.

As a company working to help improve the health and well-being of others, we must display honesty and integrity in all of our actions. We must never sacrifice ethical behavior as we work toward our business goals.

As part of UnitedHealth Group's Integrity and Compliance Program, we have adopted the Principles of Integrity and Compliance that outline basic principles to follow on the job. I encourage you to also listen to your own sense of fairness and honesty so that we always act right in our day-to-day business activities.

Sincerely,

A handwritten signature in black ink that reads "Bill McGuire". The signature is written in a cursive, slightly stylized font.

William W. McGuire, M.D.
Chairman and CEO



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OUR MISSION

Core Purpose:

To improve the health and well-being of individuals.

Core Values:

Everything we do will be driven by the following:

- ▶ Systemic improvement in the quality of health care
- ▶ Respect for the patient-physician relationship
- ▶ Commitment to leading edge innovation
- ▶ Compassion for people
- ▶ Honesty and integrity

Business Goal:

To be the recognized leader in designing, organizing and managing health care services in communities across the United States and internationally. As a company, we will achieve this through a customer-driven focus that emphasizes the following:

Quality. We will improve the quality of care by helping to identify the most effective treatments, based on scientific evidence, and sharing the information with physicians, customers, members and the public.

Value. We will deliver more value for the dollar to our customers than our competitors.

Service. We will strive to deliver unparalleled service to our members.

Efficiency. We will manage health care resources efficiently and be disciplined about controlling costs.

Access. We will provide equitable and appropriate access to care and deliver products that provide choice for consumers.

Education. We want members to play an active role in managing their own health and will provide them with information and support that will help them lead healthier lives.

Accountability. We will provide objective information that will allow customers, members and health care providers to evaluate our performance.

Guiding Principles:

As employees, we will do the following:

Look beyond the horizon. We will not be content with the status quo. We will continue to explore new opportunities, propose new ideas, and search for better ways to meet the needs of our customers.

Work together. No one has all the answers. We will treat each other with respect and solicit advice and assistance from our co-workers. The best work comes from sharing our talents and hard work with each other.

Think like customers. In every decision we make, we will consider the value it provides to our customers. We will treat our members the way we would want to be treated--with compassion, respect and unsurpassed service.

Act like owners. We will take responsibility for moving business objectives forward. We will continually raise our own expectations of what can be accomplished, and we will hold ourselves accountable for reaching the goals we set.

Living Our Mission

Here are ways we can show in our day-to-day actions that we are living the UnitedHealth Group mission:

- Respect each other and listen with an open mind.
- Trust each other.
- Keep our commitments.
- Speak with honesty and candor.
- Reach and acknowledge closure on decisions.
- Support and represent team decisions as our own.
- Place team interests before our own.
- Provide complete and impartial information.
- Actively recognize and celebrate successes.
- Address conflict in a direct, constructive and confidential manner.
- Include the stakeholders in decisions.
- Plan before we act.
- Address each other about any violation of our standards of business conduct.

INTRODUCTION



■ Commitment to Integrity

Honesty and integrity are core values of our organization. Our commitment to these values has helped us earn a reputation as one of the most admired companies in America today.

The need to make sound, ethical decisions as we interact with participants, customers, regulators, providers, investors, suppliers, colleagues and communities has never been greater. It's not only the right thing to do, it's necessary for success now and in the future.

Because UnitedHealth Group is committed to the highest standards of integrity, the company implemented its Integrity and Compliance Program. A description of UnitedHealth Group's Integrity and

Compliance Program is available on Frontier, the company's Intranet. You can find it by choosing Corporate Departments on the navigation bar, then Integrity and Compliance. Then select Program Descriptions and Supplements under About

Look to Frontier for the Most Current Information

Check the Integrity and Compliance site on Frontier to review the most current versions of these Principles of Integrity and Compliance, the UnitedHealth Group Policy Manual and other documents referenced here. Go to **Corporate Departments** from the home page, then **Integrity and Compliance**.

I&C. If you do not have access to Frontier, you may check with your manager or call the Compliance HelpLine 1-800-455-4521, to obtain copies of the program description, these Principles or other referenced documents.

■ Company Policies

These Principles are meant to alert employees to major legal and ethical issues that may arise. It is not a detailed rule book. It is a summary of many of UnitedHealth Group's business conduct policies.

These Principles outline many, but not all, of UnitedHealth Group's policies of general applicability. Policies that are generally applicable to most employees are available in UnitedHealth Group's Policy Manual on Frontier's Integrity and Compliance site. Employees are responsible for being familiar with the policies in the Policy Manual. If you do not have access to Frontier and want a copy of a policy, ask your manager or call the Compliance HelpLine (1-800-455-4521).

Also, much of the information provided in these Principles summarizes more detailed and comprehensive policies. Generally, when these Principles are summarizing a policy, the complete policy is identified in a parenthetical, and available in the Policy Manual.

In addition to the policies in the Policy Manual, there are many policies that specifically relate to certain business units, departments or products. UnitedHealth Group and its business units will communicate these specific policies to employees and others who are affected by them and must comply with them as they conduct business for the company.

These Principles and other company policies can not address every situation employees may encounter. It is impossible to establish

rules to address every possible situation employees may face. Consequently, UnitedHealth Group relies on the good judgment and values of its employees and managers to implement the intent of these Principles when company policies do not address a specific situation. If an employee is still not sure what to do, the employee should request guidance from the resources identified in these Principles.

■ Personal Accountability

All of us are personally accountable for our decisions and actions. We each must follow a course of conduct that preserves and enhances UnitedHealth Group's reputation for honesty and integrity. To do so, it is critical that we understand the laws, company policies and contractual obligations that apply to our specific area. And, we should never misuse our authority, whether for personal interests or to the detriment of the UnitedHealth Group.

■ Added Responsibility for Managers

While all UnitedHealth Group employees must follow these Principles of Integrity and Compliance, each UnitedHealth Group manager must be an example for those in his or her group. They must know these Principles, the Policy Manual and any business unit and department policies that apply to their area of responsibility. Managers must also know how to recognize potential integrity and compliance issues that may affect their areas. And, they must learn how to get advice about these issues.

In addition, managers must create and maintain a workplace where employees, consultants and contractors know that ethical and legal behavior is expected of them. Managers should also promote discussion of the ethical and legal effects of business decisions.

Managers must make sure that the people on their teams understand these Principles, as well as any laws, company policies and contractual obligations that apply to them. By doing so, we will maintain a culture at UnitedHealth Group that promotes the highest standards of integrity and compliance.

■ Applicability of these Principles & Company Policies to Contractors

In some cases, all or part of these Principles and other company policies may also apply to those acting on behalf of the company such as sales agents, external advisors, contractors, consultants and others. The business person responsible for the relationship and their in-house legal counsel should decide if these Principles or any company policies apply to a contractor. The contractor must be notified in writing which Principles and company policies apply.

■ Violations and Consequences

Failure to follow these Principles of Integrity and Compliance, any other company policies, applicable laws and contractual obligations will compromise UnitedHealth Group's good name. Unethical or illegal acts cannot be justified by saying they were for the good of the company or were directed by a higher authority in the company. No employee is ever authorized to commit, or direct another employee to commit an unethical or illegal act. In addition, employees cannot use a contractor, agent, consultant, broker, distributor or other third party to perform any act not allowed by law, these Principles, any company policy or any applicable contractual obligations.

The goal of these Principles is to promote proper conduct and avoid the need for discipline. However, all violations of the law, these Principles, company policies and contractual obligations will be taken seriously and may result in discipline, up to and including dismissal.

Not cooperating with, obstructing or undermining investigations, withholding or destroying information, or providing incomplete or misleading information are violations of these Principles of Integrity and Compliance, as is not reporting a violation. Managers who are not diligent and fail to report, and in some cases detect, violations may also be disciplined.

In addition, employees who commit criminal or illegal acts may face immediate dismissal and, for acts against UnitedHealth Group, possible court action.

Quick Quiz

Each employee brings professional skills and personal values to his or her job. When faced with a difficult situation, it may help to ask these questions:

- Are my actions legal?
- Am I being fair and honest?
- Will my actions stand the test of time?
- How will I feel about myself afterward?
- How will it look in the newspaper?
- Will I sleep soundly tonight?
- What would I tell my child to do?

After asking these questions, if you're still not sure of the proper course of action, ask – and keep on asking until you're sure you are taking the right action.



ASKING QUESTIONS AND REPORTING MISCONDUCT

■ Resources for Questions

You are urged to talk with your manager about any questions you may have and any action you believe may violate these Principles, the law, company policies or any contractual obligation. If you are not comfortable talking with your manager or you have already done so and you think the problem has not been completely resolved, there are several other resources you can contact, including:

- ▶ A more senior manager in the business unit
- ▶ The business unit compliance officer
- ▶ The Human Resources Department
- ▶ Corporate Employee Relations
- ▶ The Legal Services Department
- ▶ UnitedHealth Group's Integrity Officer
- ▶ The Compliance HelpLine

To reach the Compliance HelpLine, call (800) 455-4521. The Compliance HelpLine is available 24 hours a day, 7 days a week. To reach UnitedHealth Group's Integrity Officer, call (612) 936-1967. You also may mail questions or concerns to: Integrity Officer, mail route MN008-T202, or, e-mail Vickie McCormick, the current integrity officer, at Vickie_L_McCormick@uhc.com.

The question and answer scenarios available when you select the What if...? button on the Integrity and Compliance website interpret many of the policies in the UnitedHealth Group Policy Manual and may answer your specific question.

■ Your Duty to Report Misconduct

To protect UnitedHealth Group's reputation – as well as your personal reputation – you must promptly report illegal or unethical conduct to

an appropriate company representative. If you do not promptly report illegal or unethical conduct, the conduct could continue, causing the company and its employees more harm. Failure to report suspected violations violates these Principles of Integrity and Compliance and can lead to discipline.

If you have any concerns about reporting the conduct to your manager or you have done so and the conduct has not been corrected, contact one of the resources identified above.

Managers who receive reports of possible illegal or unethical conduct must take *immediate* action. The type of action that should be taken depends on the alleged misconduct. The manager should carefully identify and involve all possible stakeholders. In some cases, the manager will be able to look into and correct the conduct in question without involving anyone else.

If the matter involves employment issues or could affect an employee's employment status, the manager must tell the Human Resources Department or Corporate Employee Relations. If the issue concerns regulatory compliance, the manager should contact the compliance officer for that line of business. If it's possible that a legal violation may have occurred, the manager should contact the Legal Services Department. If the manager is not sure what to do, he or she should consult with his or her manager or another member of the management team.

■ Cooperating with Internal Investigations

If the company initiates an investigation to determine whether there has been illegal or unethical conduct, you must cooperate with the

Principles of Integrity & Compliance

investigation and disclose all information and records you are aware of that are relevant to or will assist the investigation. Failure to cooperate with an internal investigation violates these Principles and can lead to discipline.

■ Confidentiality, Retaliation & False Reports

When raising an integrity and compliance issue, you may remain anonymous. To the extent allowed by law, the company will take reasonable precautions to maintain the confidentiality of those who report an integrity or compliance concern. Generally, the identity

of a person reporting a concern will be disclosed only as necessary for the company to investigate the issues raised.

Any retaliation against an employee who, in good faith, reports a suspected violation of these Principles, company policies, the law or contractual obligations, is not allowed and should be immediately reported to the Human Resource Department or the Compliance HelpLine.

Making malicious or purposely false reports also violates these Principles of Integrity and Compliance.

Key Contacts

Due to the fast pace and many demands of our company, at times the best course of action in any given situation may not be obvious. UnitedHealth Group offers many options to help you discuss issues or report concerns.

Manager	Your best contact for workplace issues.
Human Resources	Your contact for compensation and Human Resources concerns, or policy guidance and interpretation.
Corporate Employee Relations (952)936-1758	Your contact for Human Resources concerns; employment or workplace issues; or policy guidance and interpretation.
Legal Services Department	Your contact for UnitedHealth Group legal questions.
Optum [®]	Your contact for help with health, family, substance (888) 842-4224 abuse, and other personal issues.
Benefit Service Center (800) 561-0861	Your contact for questions about employee benefits.
Corporate Security (952) 936-1310	Your contact to report concerns regarding employee security & fraud against the company by its employees, contractors & vendors.
Risk Management	Your contact to report unsafe conditions, workplace (952) 936-1152 hazards and potential claims against insurance policies.
Compliance HelpLine Available 24 hours a day, 7 days a week. (800) 455-4521	Your contact for advice on and help interpreting these Principles of Integrity and Compliance and company policies, or to report violations of the Principles of Integrity and Compliance, company policies, or the law. Note: Please first report violations to your manager. If the situation involves your manager, you may contact your manager's manager, Human Resources, the integrity officer, or the Compliance HelpLine.
Integrity Officer (612) 936-1967 Mail Route: MN008-T202 E-mail: Vickie_L_McCormick@uhc.com	



ACCURACY OF COMPANY RECORDS

UnitedHealth Group needs correct information and reliable records to make sound business decisions and to submit reports to customers and governmental agencies. You must be complete, accurate and honest when recording, reporting and retaining company information. This includes business records involving quality, safety and personnel, as well as time, expense and other financial records.

All financial books, records and accounts must correctly reflect transactions and events, and conform both to generally accepted accounting principles and to UnitedHealth Group's system of internal controls. Here are more guidelines to keep in mind:

- ▶ Do not make false or misleading entries or omit information in any of UnitedHealth Group's systems, books or records for any reason. Keep systems, books, records and accounts in reasonable detail so they correctly reflect transactions and events.
- ▶ Fill out expense reports and time sheets correctly and completely and show the correct purpose and amount of each item on expense reports.
- ▶ The most senior employee at a function should include the costs for the function in an expense report.
- ▶ Do not create or keep secret or unrecorded funds, assets or accounts for any purpose.
- ▶ Never purposely pay or approve an invoice, expense report, or other document

that is not correct, not accurate, or is misleading. Always use care when reviewing documents before approving them.

- ▶ Properly and consistently follow cost accounting standards and principles of cost allowability, as well as relevant company policies and procedures and contractual obligations.
- ▶ All invoices to customers and others should correctly note the products sold or services performed, the true sales price, and the terms of sale. Promptly refund payments that are more than amounts billed, or credit customer accounts.

(See the Accurate Books and Records policy)

What if . . .

Q: *One of my work assignments includes a contract with the federal government for which UnitedHealth Group 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: Accurate time accounting for government cost contracts is essential. Failure to maintain accurate time accounting could result in serious fines and penalties for UnitedHealth Group – and perhaps exclusion from future government business. Immediately contact the attorney assigned to your Business Unit or call the Compliance HelpLine (1-800-455-4521).

BUSINESS COURTESIES



■ General

Gifts, favors, travel and entertainment may cause a conflict of interest with your work at UnitedHealth Group. As a result, always follow these simple guidelines:

- ▶ Never offer or accept a gift, favor, travel or entertainment of more than a nominal value, unless approved in advance as required by the company's Business Courtesies policy.
- ▶ Never accept or provide gifts, favors, travel or entertainment of any value if it will compromise or appear to compromise your judgment.
- ▶ Never solicit gifts, favors, travel or entertainment, except for company approved causes.
- ▶ Never offer a gift, favor, travel or entertainment to a government employee unless you have confirmed with Legal Services in advance that you may do so.

To help you make the right decision, ask yourself these questions when giving or receiving any business courtesy:

- ▶ Is it legal, customary and in good taste?
- ▶ Is it clearly related to UnitedHealth Group business?
- ▶ Would I feel okay giving or receiving the gift or business courtesy in front of others?

If you have any doubts about the effects the gift, favor, travel or entertainment could have on the company's reputation or your personal reputation, you should not offer or accept it.

Please note that these guidelines apply to actions with those outside of UnitedHealth Group. This section does not apply to actions between the company and its employees, nor actions among UnitedHealth Group employees.

(See the Business Courtesies policy)

■ Gifts

UnitedHealth Group's gift policy embraces a "rule of reason." As a general rule:

- ▶ You may accept gifts of nominal value, such as promotional items (T-shirts, mugs, baseball caps) given in the regular course of business. But, you should not accept small gifts on a regular or continual basis.
- ▶ Do not accept gifts of money or cash equivalents.
- ▶ When giving gifts, make sure they are in keeping with the business relationship and do not appear to be attempts to obligate or influence the recipient.
- ▶ Do not offer any gift, favor, travel or entertainment if it is against the policy of the recipient's organization. Many companies have policies that do not allow any gifts.
- ▶ In the case of the government, the offer of anything, sometimes even a cup of coffee, may be against the law. And gifts to foreign

government officials may violate the Foreign Corrupt Practices Act (see Page 29).

- ▶ When in doubt, check with your manager, the Legal Services Department, Human Resources or the Compliance HelpLine (1-800-455-4521).

Offering or taking bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business is unethical, illegal and strictly forbidden.

What if . . .

Q: *One of our suppliers gave me a basket of food during the holidays. Was it OK to accept it?*

A: You may accept small tokens of appreciation, as long as they don't appear to obligate or influence you or the company. If possible – like with baskets of food – you are encouraged to share the gift with your colleagues. Also, if you are not sure, ask your manager or Human Resources or you can call the Compliance HelpLine (1-800-455-4521).

■ Favors

Do not accept discounts when buying a supplier's or customer's products or services for personal use, unless the discounts are offered to UnitedHealth Group employees in general. Never solicit or accept special treatment on loans, stock offerings, or other services unless the treatment is available to all other employees.

■ Entertainment and Travel

Entertainment is often helpful in building and maintaining business relationships.

UnitedHealth Group employees may accept invitations for entertainment that is reasonable in the context of the business, or that furthers the company's interests. For example, in most cases you may attend a cultural event, sporting event, or business meal with a business contact, or attend a supplier's holiday or celebratory function. But, generally you should not accept tickets for an event the business contact will not be attending, such as tickets for a sporting or cultural event.

Business courtesies involving travel and lodging are cause for more serious concern. You should not accept travel or lodging without your manager's consent.

You may not entertain guests, employees or customers where there is "adult entertainment", as this is not suitable for business purposes.

■ Government Employees

There are very strict rules about what may be offered to government employees. The rules depend on the nature of the relationship between UnitedHealth Group and the government employee.

If the government employee is a contract officer for a contract we have or are seeking, the rules are very strict. In that case very little, if anything, can be offered to the person. In some cases, you may not even be able to offer beverages or food during a meeting.

If the person is a member of a legislative staff, you may be able to offer meals or entertainment without breaking the law – but you need to make sure you strictly follow any restrictions that apply.

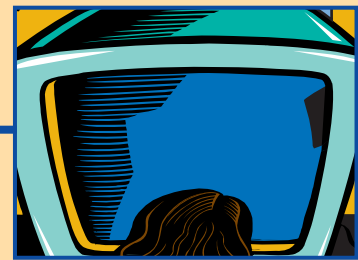
If you have regular contact with government employees, you must know and carefully follow the rules that apply to those employees.

(See the Government Contracting policy)

■ Reporting Business Courtesies

If you are ever in doubt as to how accepting or giving a gift, favor, travel or entertainment might appear, talk to your manager. Also, if during one calendar year you or your family members accept gifts, favors, travel or entertainment that are more than nominal in value, which is typically valued at more than \$100 from a single source, you must get the approvals required by the Business Courtesy Policy.

COMPANY ASSETS: PROTECTION AND USE



■ Protecting Company Assets

UnitedHealth Group entrusts all employees with many company assets including financial assets, buildings, equipment, supplies and information assets, the time it pays employees to work and much more. Company assets must be maintained for business purposes and used for UnitedHealth Group's benefit. Everyone is responsible for protecting these assets from loss, damage, misuse or theft.

(See the Office Security section of the Employee Handbook)

■ Use of Company Assets

As a general rule, personal use of UnitedHealth Group assets is not allowed. You may not use company resources for personal financial gain unrelated to the business of UnitedHealth Group.

(See the Computer Equipment and Resources and Employee Use of Company Property policies)

■ Personal Use of Electronic Media

All communication systems, including phones, e-mail, the Intranet (Frontier), Internet access, and voice mail belong to UnitedHealth Group and you must use them primarily for business purposes. You are allowed limited reasonable personal use of UnitedHealth Group's communication systems, but you should assume these communications are not private.

UnitedHealth Group reserves the right to access, monitor and disclose the contents of phone calls, e-mail and voice mail messages and internet usage.

You may not use internal communication channels or Internet access at work to access, post, store, transmit, download or distribute threatening or malicious materials or materials you know or should know are false or sexually explicit. This includes anything that is a crime or promotes criminal activity, gives rise to civil liability, or violates any laws. Also, among

other things, 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 look for a job outside of UnitedHealth Group.

Employees who abuse the company's communication systems or use them inappropriately for non-business reasons may lose these privileges and be subject to discipline.

(See the Computer Equipment and Resources, Employee Use of Company Property, Electronic Mail (Email) Security and Internet Access policies and the Information Security section of the Employee Handbook.)

What if . . .

Q: *Why does the company care if I use my company computer to surf the web or send personal emails – as long as I do it on my own time. It really doesn't cost the company anything.*

A: There is a cost associated with using the company computer – even if it is during your own time. Surfing the web involves more company resources than just the computer in your work station – there are also data lines and other company resources that are being used and, therefore, not available for company use. One company discovered the third most visited Web site by its employees was a music site and that 4 percent of its Internet capacity was being used by employees downloading music. Wouldn't it be frustrating to learn your computer is slow because of inappropriate Internet use by other employees? Also, remember when you go to a Web site, UnitedHealth Group is identified as the visitor. Imagine if it was publicized that you had visited a chat room that could be embarrassing to the company and you.

■ Intellectual Property

Among UnitedHealth Group's most valuable assets is its intellectual property. Intellectual property includes materials, inventions or ideas that are copyrighted, trademarked or patented and trade secret information. Trade secrets are valuable Company information and intellectual property used and known by UnitedHealth Group that may not be subject to patent, copyright or trademark protections, but are not generally known by our competitors or other third parties.

Trade secrets include, but are not limited to, the following types of categories: inventions; new product or marketing plans; business strategies and plans; detailed financial and pricing information, computer programs, models and data bases (including without limitation source codes), designs, analytical models; customer lists and customer information, supplier and vendor lists and supplier and vendor information. This list of categories is not exclusive but suggests the wide array of information that may be entitled to trade secret protection.

UnitedHealth Group owns all intellectual property you make, create, develop, write or conceive either on your own or with another person while employed by UnitedHealth Group and whether developed during working hours or after working hours that:

- ▶ is related in any manner to the actual or anticipated business, research or development of the company;
- ▶ results from work assigned to or performed by you for the company; or
- ▶ is conceived of or made with the use of the company's systems,

equipment, materials, facilities, computer programs or confidential information.

(See the Protection of Information Assets policy)

■ Protection of Intellectual Property

UnitedHealth Group strives to protect its intellectual property through patents, copyrights, trademarks and treating other confidential and proprietary information as trade secrets.

You must carefully guard the secrecy of these trade secrets and confidential and proprietary information. Mark this information “Confidential,” keep it secure, and limit access to only those who need to know it to perform their jobs. Be careful not to discuss such confidential or proprietary information in public areas. Similarly, be careful when working on a laptop computer in a public area where others can view your work. Many companies’ secrets have been lost in elevators, restaurants, airplanes and other public places.

Your duty to guard UnitedHealth Group’s confidential and proprietary information and trade secrets continues after you leave the Company. Keep in mind that trade secret information includes not only that information contained in written or digitized documents, but also includes all such information that you may have committed to memory during the course of your job.

■ Trademarks and the UnitedHealth Group Name

The UnitedHealth Group brand identity, including its name, logo, trademarks and service marks are among the company’s most

valuable assets. To protect these assets, you must use them correctly and only to advance the company’s interests. Consult the Legal Services Department with questions or concerns about the use of UnitedHealth Group’s trademarks.

Guidelines for how to use the brand identities are also on the Corporate Communications site on Frontier.

(See the Trademarks and Service Marks policy)

■ Communications with UnitedHealth Group’s Attorneys

Information you give UnitedHealth Group’s attorneys to obtain legal advice about company business is generally protected by the attorney-client privilege. This privilege protects confidential attorney-client communications from being shared with others. You should keep these communications confidential and not share them with others, including other UnitedHealth Group employees, except on a need-to-know basis.

The attorney-client privilege belongs to the company, not to UnitedHealth Group employees. You should not consider anything you tell a company attorney to be protected from disclosure to management. You should also remember the attorneys are representing the company, not you.

You should not contact UnitedHealth Group’s attorneys for advice about personal or employment issues. The Human Resources Department, Corporate Employee Relations or Optum® are your resources for help with these issues. If you have questions about communications with UnitedHealth Group’s attorneys, please consult the Legal Services Department.

■ Computer and Network Security

UnitedHealth Group's business depends upon the continuous, efficient operation of its computer systems and networks. The company has a large investment in these assets. You must guard their integrity. Do your part by protecting passwords, IDs and access to computer systems. Never download unauthorized software. All computers must be protected with virus protection software. Take steps to avoid "viruses" from the Internet or unauthorized software. And protect the company from lawsuits by using only legally licensed software.

(See the Computer Information Security, Data and Software Access Control, Employee Termination, Individual Accountability, Information Security Awareness, New Employer Security Orientation, Password Controls, Portable Computer Security, Security Program, Unauthorized Software and Virus Detection policies and the Information Security Section of the Employee Handbook.)

■ Inquiries from the Government or the Media

UnitedHealth Group cooperates with requests for information from government agencies and authorities. To safeguard legal rights, contact the Legal Services Department for guidance before responding to subpoenas or any such request for information (other than routine forms).

Send questions from the media to your Public Relations contact to ensure professional handling. Refer questions about financial results or from financial analysts and stockholders to Capital Markets Communications and Strategy.

(See the Government Interviews of Company Employees and the Disclosures of Information to the Public, the Media and Analysts policies)

■ Creating and Retaining Business Communications

Almost all business records and communications may become subject to public disclosure during litigation or governmental investigations. Business communications are also often obtained by outside parties or the media. As a result, you should try to be as clear, concise, truthful and accurate as possible when creating any information. Do not guess, exaggerate, use colorful language, legal conclusions, or negative characterizations of people or their motives. Remember that tone, such as sarcasm, can be misread and misinterpreted. This policy applies to communications of all kinds, including e-mail and "informal" notes or memos.

Always save and destroy records as stated in UnitedHealth Group's Records Retention Policy. If litigation, an audit, or a governmental investigation is pending, do not destroy any related records. Direct any questions about documents pertaining to litigation, an audit or an investigation to the Legal Services Department.

(See the Accurate Books and Records and Retention of Records policies)

Antitrust laws in the United States and fair competition laws in many other countries were put in place to promote healthy competition among businesses and to protect consumers against anti-competitive acts. These laws can be very complex. This section briefly covers issues common to many of them. If you have questions, contact the Legal Services Department.

COMPETITION



- ▶ Agreements between competitors that limit competition are illegal and will not be tolerated. Examples include fixing prices or terms of sale; allocating products, markets, territories or customers; or agreeing to boycott certain customers or suppliers.
- ▶ Never discuss or even listen to a discussion of present or future prices, profit margins or costs, bids or intended bids, terms or conditions of sale, market shares, sales territories, distribution practices or other competitive information with a competitor's representative. Merely talking about these issues with competitors may be viewed as an illegal agreement.
- ▶ Do not disclose a UnitedHealth Group bid or solicit information about a competitor's confidential bid. This may be viewed as a form of hidden agreement and you must avoid it.

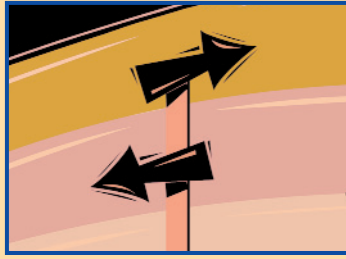
Any employee who has a question about the potential antitrust implications of a discussion, decision or action must consult with the Legal Services Department before any action takes place.

(See the Antitrust Compliance policy)

What if . . .

Q: *I have a friend who is a salesperson for a competitor. Whenever we go out together, we end up talking about business like the latest marketing and pricing strategies our companies have developed. Since we're friends – this isn't a problem is it?*

A: Your discussions involve two very dangerous areas. First, you may be disclosing information UnitedHealth Group considers confidential and proprietary. Second, any discussion of this type among the representatives to two competitors – even in a social environment – can be considered an antitrust violation. Discussions about marketing and pricing is particularly dangerous. If you have friends and acquaintances who work for UnitedHealth Group's competitors, you should not discuss anything that reveals confidential and proprietary information about UnitedHealth Group or that could be construed as a discussion about pricing, marketing, boycotts or other types of antitrust violations.



CONFLICT OF INTEREST

Business decisions and actions must be based on the best interests of UnitedHealth Group and not personal interests or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect your independent and sound judgment on behalf of UnitedHealth Group. Avoid any situation that causes or appears to cause a conflict of interest with UnitedHealth Group's interests.

(See the Avoiding Conflicts of Interest and Business Courtesies policies)

■ Disclosure

The best way to avoid a conflict of interest is to disclose any relationships others might misinterpret. This includes any relationships with other employees, customers, suppliers and competitors. You should raise questions about possible conflicts of interest and disclose these kinds of situations to your manager or the Compliance HelpLine as they arise.

■ Board Memberships

You may serve on the board of directors of community or nonprofit organizations if your role does not affect your ability to perform your job for UnitedHealth Group. To make sure such activities do not cause a conflict of interest or other problem with your position at UnitedHealth Group, you should tell your manager of your membership. You also must get approval from the Office of the General Counsel before you become a board member of any for-profit organization.

If you become a board member for another organization, you should ask about the type of indemnity and insurance it provides for board members. Except when you are a member of another organization's board at UnitedHealth Group's request, UnitedHealth Group will not indemnify you for anything that occurs as a result of your board membership.

You must not serve on the board of directors of any company that competes with UnitedHealth Group.

(See the Outside Directorships policy)

■ Employment and Activities Outside of UnitedHealth Group

You may not provide services to any business that competes with UnitedHealth Group. In addition, UnitedHealth Group employees generally may not accept payment for services they perform for UnitedHealth Group outside of their regular jobs.

A conflict of interest may arise if you are employed outside of UnitedHealth Group and it hinders your work for UnitedHealth Group. You must make sure any outside activities are strictly separate from your duties at UnitedHealth Group. You may not use UnitedHealth Group's time, resources or people for non-UnitedHealth Group employment activities.

(See the Avoiding Conflicts of Interest policy)

■ Family Members

A conflict of interest may arise when doing business or competing with companies for which a family member works, or in which your family member has an ownership interest. You should disclose any such relationships to your manager. Your manager will consult with Human Resources, Employee Relations, the Legal Services Department or the integrity officer to decide the best course of action.

What if . . .

Q: *My sister works for a company that would be a great office supplies vendor for UnitedHealth Group. Can I purchase from her company?*

A: You can not personally purchase from a family member or have any direct or indirect influence of any decision to purchase from her. The potential for an appearance of a conflict of interest is too great. However, if you are completely removed from UnitedHealth Group's purchasing decisions in her business area, you may introduce her to the appropriate person within UnitedHealth Group.

■ Gifts, Favors, Travel and Entertainment

(See "Business Courtesies", Pages 13 to 15)

■ Investments and Other Financial Opportunities

A financial investment that compromises your independent judgment or work at UnitedHealth Group is a conflict of interest. The term "financial investment" means stock, options to buy stock, or other ownership interests in a company.

UnitedHealth Group's policy embraces a "rule of reason." For example, small investments in companies that compete with UnitedHealth Group, or small investments by your spouse in his or her employer (when the company competes with UnitedHealth Group), may not be a problem.

If your investment or your spouse's investment in a UnitedHealth Group competitor is not small, telling your manager is a key first step. It will ensure your integrity is not questioned and the issue will be resolved to everyone's satisfaction.

You should not invest in suppliers or companies with whom UnitedHealth Group is contemplating a transaction if you will need to recommend or make decisions about products, services or the merits of a transaction with that supplier or company. Also, you must promptly report any situations where companies/suppliers that you are evaluating or doing business with offer you stock, or include you in an Initial Public Offering.

If you have any questions about whether a situation is a conflict of interest, consult with your director. Of course, you or your director may consult the Legal Services Department, the integrity officer or the Compliance HelpLine.

You also may not directly or indirectly buy, lease or acquire rights to any property or materials if you believe UnitedHealth Group also may be interested in the opportunity. You should tell your manager about any business opportunity you become aware of due to your job at UnitedHealth Group.

(See the Avoiding Conflict of Interest policy)

■ Inside Information & Securities Trading

Insider trading is against the law and UnitedHealth Group's Insider Trading policy. You violate the insider trading provisions of the securities laws and company policy if you engage in a securities transaction while possessing material nonpublic information about that company.

If you possess inside information, you can be held liable under insider trading laws if you give that information to another person and that person engages in a securities transaction based on your information or stock tip.

Also, you should not engage in investment activities that give you a financial interest in poor stock performance by UnitedHealth Group (generally true for "put" options or "short sells").

(See the Insider Trading policy)

What if . . .

Q: *My boss has been traveling a lot because UnitedHealth Group is acquiring Acme Health Care. I know that when acquisitions are announced, the stock of the company being acquired often increases in value. I want to buy some Acme stock before the acquisition is announced. The Insider Trading Policy only prevents me from trading in UnitedHealth Group stock – right?*

A: No, the Insider Trading policy prohibits employees from trading in the stock of any company – not just UnitedHealth Group stock – that they have non-public material information about. Knowing about the planned acquisition of Acme by UnitedHealth Group is non-public material information about Acme that prohibits you from purchasing Acme stock.*

What if . . .

Q: *I know that the Insider Trading Policy prohibits employees from trading in UnitedHealth Group stock whenever they possess "material nonpublic information." How do I know if the information I have is "material"?*

A: Information should be regarded as material if a reasonable investor would consider the information important when deciding to buy or sell stock. Generally, any information that influences an investor's decision to buy or sell stock should be regarded as material.

When you are thinking about buying or selling UnitedHealth Group securities, you should apply the "reasonable investor" test: "Would a reasonable investor consider this information important in deciding whether to buy or sell?" If the answer is yes, don't trade until the information is public or no longer material.

While it is not possible to define exactly what constitutes "material information," you should be aware that the following types of information may be considered "material":

- Financial results
- Projections of future earnings or losses
- News of a pending or proposed acquisition or
- Gain or loss of a substantial customer or supplier disposition
- Changes in dividend policy
- Impending financial problems
- New product announcements of a
- Significant litigation exposure due to
- Changes in senior management significant nature actual or threatened litigation
- Significant pricing changes
- Significant product defects or modifications
- New equity or debt offerings

EMPLOYEE RELATIONS



It is UnitedHealth Group's goal to attract, retain and reward a high-quality workforce. To ensure employees are able to perform, develop and advance within the company, Human Resources and Employee Relations is available to address employee issues.

If you believe your rights have been violated or if you have other workplace concerns, first consult your manager or call the Human Resources Department. If you do not receive a clear answer or if you feel you may not receive a fair or an adequate review of your situation, contact Corporate Employee Relations or call the Compliance HelpLine (1-800-455-4521).

■ Discrimination

At UnitedHealth Group, our aim is to treat each other as we wish to be treated ourselves: with dignity and respect. We strive to keep our workplace free from discrimination on the basis of gender, age, race, color, religion, national origin, veteran status, disability or any other inappropriate basis. We support equal employment opportunity for all employees and applicants. We will not unlawfully discriminate in hiring, terminating or promoting employees or in any other condition of employment.

(See the Employment and Work Conduct and Discipline Sections of the Employee Handbook)

What if . . .

Q: *I am a 55 year old male and was recently passed over for a promotion. I am almost certain it's because of my age. What should I do?*

A: It is probably best for you to discuss the reasons you were not selected with the hiring manager or the Human Resources professional who handled the recruiting assignment. If you still have concerns, then call Corporate Employee Relations (952-936-1758) to discuss filing an Internal Dispute Resolution claim. You may also call the Compliance HelpLine (1-800-455-4521).

■ Harassment and Related Issues

The UnitedHealth Group workplace must be free from intimidation and harassment. We will not tolerate from any employee verbal or physical conduct that harasses or disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment. Unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature also are not allowed.

You are encouraged to speak out if a co-worker's conduct makes you uncomfortable. Promptly report harassment to Human Resources, Employee Relations and/or the appropriate manager if it occurs. And, report sexual overtures or harassment of any kind by suppliers or customers to your manager, Human Resources, Employee Relations or the Compliance HelpLine.

Engaging in a romantic relationship with someone in your direct line of management exposes the company to a substantial risk. If such a situation develops, you must work with your management and Human Resources to resolve the situation.

A romantic relationship with a supplier or customer with whom you work also may be a problem. If such a relationship develops, tell your manager so another employee may be assigned to the account.

(See the Work Conduct and Discipline section of the Employee Handbook)

■ Employment Privacy

At UnitedHealth Group, we strive to respect each other's privacy. At the same time, the company needs to maintain an efficient work environment.

While UnitedHealth Group does not routinely monitor personal communications, employees should not expect communications in the workplace to be private. UnitedHealth Group reserves the right to review your use of phones, voice mail, the Internet, the Intranet or e-mail for any reason without prior notice.

UnitedHealth Group also reserves the right to search employee work spaces, lockers, briefcases, etc. In addition, in order to promote the security of its work place and employees, the company maintains cameras to monitor certain common areas and, on occasion, the company may install surveillance equipment to investigate specific instances of possible misconduct.

(See the Computer Equipment and Resource Use, Electronic Mail Security, Employee's Use of Company Property, Intranet Communications and Controls and Protection of Information Assets Public policies and the Information Security Section of the Employee Handbook)

■ Former Government Employees

Former U.S. government employees generally are not allowed to represent the company in matters where the government has substantial interest and where the employee had prior responsibility. Retired senior government officials are further restricted from selling to, or in some cases contacting, their former agency. The time frame of these restrictions and what they apply to depend on the type of former government employment. All UnitedHealth Group employees who are former government employees are expected to know and comply with any restrictions on the functions they can perform. Such employees must also notify their managers of any such restrictions.

(See the Hiring and Recruiting Former or Current Government Employees policy)



GOVERNMENT CUSTOMERS

It is UnitedHealth Group's policy to treat all of our customers, including federal, state and local governments, with the honesty, fairness and quality described in these Principles of Integrity and Compliance. We also strive to comply with the procurement laws and regulations put in place to protect the public interest. These laws apply to UnitedHealth Group whether work is done under a prime contract or subcontract.

UnitedHealth Group employees who work with government officials and contracts must know and comply with applicable laws and regulations. Direct questions about the laws and regulations applicable to working with government customers to the Legal Services Department.

(See the Government Contracting policy)

What if . . .

Q: *My health plan is bidding on a state Medicaid contract. We will be having several meetings with state officials that may extend through the lunch hour. Is it okay to treat them to lunch?*

A: It may not be. We should not do anything that may improperly influence, or appear to improperly influence, the bidding process. To avoid the appearance of a conflict, you should not provide a meal.



GOVERNMENT INVESTIGATIONS AND INTERVIEWS

UnitedHealth Group and its employees must cooperate fully and promptly with government actions looking into possible civil and criminal violations of the law. It is important, however, that during this process UnitedHealth Group is able to protect the legal rights of the company and its employees. To do so, employees must promptly refer

any questions from the government or requests for information, documents or interviews to the Legal Services Department. Employees who take part in government interviews must tell the truth and give complete, clear answers.

(See the Government Interviews of Company Employees policy)

HEALTH, SAFETY AND SECURITY



■ General Health and Safety

UnitedHealth Group is committed to providing a safe and healthful workplace for all employees and visitors. You can support this commitment by observing all health and safety rules and laws that apply to your job. You also must promptly report accidents, injuries, or occupational illnesses and unsafe practices or conditions to your manager.

(See the Bloodborne Pathogens, Emergency Action, Facility Operations, Fire Safety, First Aid, Hazard Communication, Injury Record and Safety Committee policies and the Office Safety section of the Employee Handbook)

■ Violence in the Workplace

In line with its policy to provide a safe workplace for employees, UnitedHealth Group is committed to maintaining a work environment free from acts or threats of violence. The company will not permit any behavior that puts the safety of its employees, participants, customers, suppliers or others in danger.

Employees may not carry any weapon on the job; onto company work sites; in company vehicles; in personal vehicles while being used for company business or while parked on company premises; or while attending UnitedHealth Group-sponsored activities. Non-employees, except law enforcement officers and specifically contracted armed security agents, are not allowed to carry a weapon onto UnitedHealth Group property. Threats or acts of violence or physical intimidation are not allowed.

Employees must promptly report all threats, attempted violence, or actual violence against themselves, other employees, customers or third parties in the UnitedHealth Group workplace to their manager, Human Resources, or Corporate Security at (952)936-1310.

(See the Work Conduct and Discipline section of the Employee Handbook)

■ Drugs and Alcohol

To help promote a safe and healthful environment for employees and provide customers and investors with the quality and productivity they demand, UnitedHealth Group requires a drug-free workplace. Employees must not be under the influence of any substance, including alcohol, that could prevent them from working safely and effectively. Using, possessing, distributing, manufacturing or being under the influence of alcohol or an illegal or illicit drug while on duty, on company work sites, or in company vehicles or in personal vehicles used for company business is not allowed. Employees with alcohol or drug problems are encouraged to contact Optum® or other qualified professionals.

Employees who are using prescription or nonprescription drugs that may impair their alertness or judgment and as a result put their safety or that of their co-workers, participants, or others in danger, must not continue to perform their jobs and must tell their manager.

(See the Work Conduct and Discipline section of the Employee Handbook)



INTERNATIONAL BUSINESS PRACTICE

No matter where they are located around the world, UnitedHealth Group employees must follow these Principles of Integrity and Compliance by complying with all of UnitedHealth Group's policies and local laws.

Some U.S. laws apply to UnitedHealth Group's non-U.S. operations. A number of the key areas where U.S. law applies internationally are outlined below.

■ Accounting

UnitedHealth Group's status as a publicly held corporation means the company must conform to generally accepted accounting principles in all operations worldwide. All payments, transactions and accounts worldwide must be correctly and truthfully recorded and reported.

(See the Accurate Books and Records policy)

■ Anti-boycott

UnitedHealth Group employees and agents may not by law cooperate in any way with an unsanctioned foreign boycott of countries friendly to the United States. The largest international boycott today is the blacklist by certain Arab countries of companies doing business with Israel. Promptly send any request for information or action that seems to relate to this or any other illegal boycott to the Legal Services Department.

■ Export Control

Several U.S. laws restrict trade with certain countries. Other laws restrict exports of certain technologies, especially in the areas of encryption and advanced computing devices. UnitedHealth Group must comply with U.S. export restrictions. Employees and agents who are not sure of the legal trade status of any country or technology must contact the Legal Services Department.

■ Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (FCPA) states that companies, including UnitedHealth Group, must not offer, promise to pay, or approve the payment of money or anything of value to foreign government officials, parties or candidates to influence the acts or decisions of foreign officials. Certain minor payments to foreign government officials made to speed up or secure the performance of "routine governmental action" may not violate the law. Always consult with the Legal Services Department before making or approving any such payment.

(See the Foreign Corrupt Practices Act policy.)

MEDIA CONTACT & COMMUNICATIONS



UnitedHealth Group's reputation comes, in part, from the relationships it maintains with the news media. For this reason, it is critical that we present information to the news media in a clear, accurate, positive and professional manner.

As a publicly traded company, it is important for UnitedHealth Group employees to know the securities law fair disclosure requirements. The following is information that cannot be discussed unless specific exceptions have been approved by UnitedHealth Group's general counsel, Capital Markets Communications and Strategy, and your business unit's communications department.

- ▶ Estimated revenues or earnings
- ▶ Business statistics, other than those already published in the earnings reports, UnitedHealth Group's annual report, filings with the Securities and Exchange Commission, or issued in news releases
- ▶ Unannounced products and services
- ▶ Senior executive hires or changes
- ▶ Acquisition or divestiture plans
- ▶ Positions on pending regulatory changes, lawsuits or investigations

■ Approvals

All news to be sent to local, regional or trade media must be reviewed and approved by the

appropriate business unit leader, business unit public relations department, subject matter experts, and assigned legal counsel before it is released.

News for the national news media or to be sent over a news wire service also must be reviewed and approved by UnitedHealth Group's Office of the Chairman, and the Office of the General Counsel.

■ Media Inquiries

Contact with the news media should be coordinated with the public relations specialist for your business or an approved public relations agency. This will make sure the reporter talks to a key subject matter expert and receives the most current information.

■ Acting as a Spokesperson

Employees who are experts in a certain area or who are company leaders may be asked to act as a media spokesperson. The business segment Public Relations staff will select and train employees for this role. All spokespersons must coordinate their media contacts with their assigned Public Relations staff.

(See the Disclosure of Information to the Public, the Media and Analysts and the Crises Communications policies)



PARTICIPANT INFORMATION

■ Disclosure of Information

At UnitedHealth Group, we collect information about the medical conditions and treatment of our participants. We know this is sensitive information and are determined to keep it confidential. We do not give out or talk about participant-specific information with others unless we have the participant's consent, it is necessary to serve the participant, it is allowed or required by law or it is determined appropriate to protect the participant or others.

UnitedHealth Group employees must never disclose confidential information that violates the privacy rights of participants. Employees

must not view any participant information other than what they need to do their job.

(See the Information Practices policy)

■ Use of Information

Generally UnitedHealth Group has acquired participant information for limited purposes of providing or administering its health and well-being products. In some cases, UnitedHealth Group is allowed to use the information for other purposes, such as research and analysis. UnitedHealth Group will use participant information only for the reasons it was received or as the participant or law allows.

(See the Information Practices policy)

POLITICAL AND COMMUNITY ACTIVITIES



■ Community Activities

UnitedHealth Group contributes to the economic and social development of the communities where it does business. In addition to creating jobs and providing services, the company encourages employees to be active in their communities.

If you take part in community activities not sponsored by UnitedHealth Group, you must make it clear that your views and actions are your own and not those of the company. Also, your activities outside the workplace should not interfere with your work at UnitedHealth Group.

If you wish to use company time or property to support charitable, nonpolitical efforts, you must first obtain your manager's approval.

■ Political Activities

No employee may contribute on behalf of UnitedHealth Group or use UnitedHealth Group's name, funds, people, property or services to support political parties or candidates unless allowed by law and approved in advance by UnitedHealth Group's general counsel.

You must not pressure a fellow employee to express a political view that goes against his or her personal view. You also must not pres

Principles of Integrity & Compliance

sure a fellow employee to contribute to a political action committee (PAC), political party or candidate, or charity.

U.S. law and the laws of many state and local governments forbid companies from contributing money, goods or services to political candidates, except for administrative support of a company's PAC. The PAC receives voluntary contributions from employees that are then contributed to political parties and candidates.

The PAC does not contribute company funds to political parties or candidates.

Outside the United States, UnitedHealth Group will honor local laws and applicable U.S. laws, including the Foreign Corrupt Practices Act.

(See the Work Conduct and Discipline section of the Employee Handbook)

PROCUREMENT PRACTICES



UnitedHealth Group believes in doing business with suppliers, contractors, agents, sales representatives, and consultants who have ethical business practices. The company will not knowingly use suppliers who violate applicable laws or regulations, including environmental, employment or safety laws.

Obtaining the best overall value for UnitedHealth Group should be the basis for procurement decisions. To make a good procurement decision, employees should obtain competitive bids, verify quality and service claims, and confirm the financial and legal condition of the supplier.

Agreements with suppliers should be in writing and clearly describe the services or products to be provided, the basis for payment, and the rate or fee. The amount must be in keeping with industry practice and with the services or products provided.

Do not commit or enter into any agreements on behalf of the company unless you have fiscal and signatory approval to do so and unless you know that UnitedHealth Group or the other party can comply with the terms of the agreement.

Personal, family and financial relationships may make it difficult to make objective decisions. If you have a personal or family relationship with, or own an interest in a supplier or potential supplier, you must tell management of the relationship. You must also take steps to make sure decisions affecting these companies are based solely on objective input and judgment. See the Conflicts of Interest section of these Principles for additional guidance regarding these types of situations.

What if . . .

Q: *One of our contractors told me off-the-record that he does not like to work with minorities. The person working on his account is a minority. What do I tell the contractor?*

A: Tell the contractor that UnitedHealth Group does not permit discrimination based on race and that contractors are required to comply with UnitedHealth Group's anti-discrimination policies. If the contractor is a problem, notify your manager or call the Compliance HelpLine (1-800-455-4521).



PROPERTY RIGHTS OF OTHERS

■ Competitive Information

Information about competitors, customers and suppliers is a valuable asset in the highly competitive marketplace. You must not use illegal or unethical means to gather competitive information.

UnitedHealth Group believes in honoring copyrights and respecting the trade secrets of others. You must not make unapproved copies or reveal or use any trade secrets of a competitor, including a former employer, in connection with your duties at UnitedHealth Group. This includes customer lists, technical developments, or operational data.

If you obtain information by mistake that might be a trade secret or proprietary information of another company, immediately consult the Legal Services Department or the Compliance HelpLine (1-800-455-4521).

■ Customer Privacy

Among other things, customers expect us to guard their privacy. We must access or use customer information and records only for approved business purposes.

Promptly refer any subpoena, court order, or request for customer information from law enforcement, government agencies, or other outside parties to the Legal Services Department.

What if . . .

Q: *A new employee in our department used to work for a competitor and gave me a copy of the competitor's response to an RFP. The responses could be very helpful when preparing our RFP responses – can we use this information?*

A: No, unless the RFP response is public information. If it is not public information, it may be proprietary information, and should not be used by UnitedHealth Group. Use of another company's proprietary information could subject UnitedHealth Group to a lawsuit by the competitor. Immediately advise your manager, the Legal Services Department or call the Compliance HelpLine (1-800-455-4521) so they can counsel you and the employee on UnitedHealth Group's policies. The information may also have to be destroyed or returned to the competitor.



PROVIDER RELATIONSHIPS

Many of UnitedHealth Group's business units rely upon and/or maintain a variety of relationships with physicians, hospitals and other health care professionals and facilities. These relationships are essential to UnitedHealth Group's business and success. Many of the business units enter into contracts with certain health care providers to render services to participants. The business units may also arrange for non-contracted health care providers to be paid for services provided to participants.

UnitedHealth Group expects its employees to act professionally and in the best interest of participants when dealing with health care providers and their staff. If an employee is having difficulty working with a health care provider or the provider's staff, the employee

should refer the matter to a manager to ensure the issue is resolved as expeditiously as appropriate. If management can not resolve an issue, the provider should be promptly notified of any appeal or other rights the provider has to pursue resolution.

All contractual arrangements with health care providers must be in writing and be approved by the Legal Services Department in accordance with the department's policies. And, all business relationships with a provider must comply with applicable legal requirements and any established company standards. If an employee is not sure what legal requirements or company standards may apply, the employee should consult his or her manager or contact the Legal Services Department.



REGULATORY COMPLIANCE & ACCREDITATION ORGANIZATIONS

■ Regulatory Compliance

UnitedHealth Group provides a variety of health care related services and coverage products in many states and countries. These products and services must be provided according to applicable federal, state and local laws. The company is subject to many other laws in addition to health care coverage regulations.

It is UnitedHealth Group's goal to provide its employees with the information and education they need to fully understand and comply with all relevant laws and regulations. Employees should promptly report violations or suspected violations of applicable laws to a manager, a member of management, the Legal Services Department, the integrity officer, or the Compliance HelpLine (1-800-455-4521).

UnitedHealth Group will answer government requests for information as required by law. It is important, however, that UnitedHealth Group is able to protect the legal rights of the company and its employees when responding to such requests. As a result, employees must refer all government requests for information to the staff who have been assigned responsibility for regulatory compliance. The compliance staff may respond to routine requests that are within the scope of their job responsibilities. All other requests must be referred to the Legal Services Department.

In response to government requests for information, the company will provide complete, factual and correct information. Never hide, destroy or change documents, or lie or make misleading statements to government officials or their representatives. Do not try to cause a fellow employee to fail to provide correct information.

(See the Government Interviews of UnitedHealth Group Employees policy)

■ Relationships with Accreditation Organizations

UnitedHealth Group will deal with all accrediting bodies in a direct, open and honest manner. Employees must never take any action that would mislead an accrediting body or its survey teams.

The scope of matters related to accreditation by various bodies is very significant and broader than the scope of these Principles. Accrediting bodies may be focused on issues both of wide and somewhat more focused interest. In any case, where UnitedHealth Group decides to seek any form of accreditation, all standards of the accrediting group are important and must be followed.



SALES AND MARKETING

One of UnitedHealth Group's goals is to satisfy its customers with high-quality products and services at competitive prices. We must treat customers with honesty, integrity, fairness and respect at all times, and we must make promises only when we are reasonably sure we can keep them.

In our highly competitive marketplace, UnitedHealth Group can create a competitive advantage by correctly representing products, services, benefits and prices. If we make promises we can't keep, hard-earned customer trust is lost. We also must not create misleading impressions, omit important facts, or make false claims about our competitors' offerings.

While UnitedHealth Group needs to aggressively market and advertise its products and services, we must do so while following "truth in advertising" laws. You must never use illegal or unethical activities to obtain business, including offering bribes or kickbacks.

What if . . .

Q: *I work in sales and am always up against competitors who make a lot of promises that they don't fulfill. I feel pressured to do the same in order to get the business. This is all part of the sales game - right?*

A: Business is not a game - it involves real commitments and impacts real people. UnitedHealth Group is successful because of long-term customers who are satisfied with UnitedHealth Group's products and services. We will continue to build a better company because we deliver what we promise - not because of a deceptive sale that later can not be fulfilled.