

Centene Corporation's Public Policy Engagement and Political Participation Policies

Since its founding as a single local healthcare plan in 1984, Centene's mission to provide better health outcomes at lower costs has been linked to the health of the communities we serve. Our purpose is to transform the health of the community, one person at a time. Public policy affects our ability to fulfill our mission and purpose, meet customer needs and provide shareholder value. Centene has engaged and will continue to engage in public policy activities, including political contributions that have the potential to improve the delivery of healthcare and affect our business, employees and the communities in which we operate. Any political contribution must reflect Centene's interest and not those of its individual officers or directors. No contribution will be given in anticipation of, in recognition of, or in return for an official act.

Centene believes it is necessary and appropriate to participate in the political process to further the long-term interests of our company and stockholders. Our operations are comprehensively regulated at local, state, and federal levels. Government regulation of the provision of healthcare products and services is a changing area of law that varies from jurisdiction to jurisdiction and proposed changes to these laws, rules and regulations can have a significant effect on our operating results and stockholder value. Permitted political contributions and memberships in trade associations play an important role in Centene's public policy engagement efforts. Centene's engagement with policy makers and advocacy on public policy issues is coordinated by our Government Affairs department and our Governance and Regulatory Affairs Committee of the Board of Directors.

The Government and Regulatory Affairs Committee's (the Committee) primary responsibility is to assist Centene's Board of Directors (the Board) in identifying, evaluating and monitoring legislative, political and regulatory trends and addressing public policy issues and concerns that affect or could affect Centene. Management reports at least annually to the Committee regarding political contributions made by Centene and its Political Action Committee, CentenePAC, including the purpose and benefit of such contributions. The Government and Regulatory Affairs Committee's responsibilities include, among others:

- making recommendations to the Board regarding the amendment and/or adoption of new policies, procedures and/or practices by Centene;

- reviewing and reporting on Centene’s position on key public policy issues under consideration in federal and state legislative, regulatory and judicial forums;
- periodically reviewing the political activities and expenditures of Centene and its political action committees;
- overseeing Centene's Political Contributions Policy; and
- overseeing the management of risks as they relate to Centene’s compliance with regulatory requirements and rapidly changing healthcare, insurance and other legislation.

Centene’s Board of Directors has adopted a [Political Contributions Policy](#) to ensure that any such contributions are made in a manner consistent with our mission and purpose and the interests of our shareholders.

Centene is prohibited under federal and many state laws from making direct or indirect corporate contributions to candidates or political parties. Where permitted by law, we may make corporate contributions with respect to state and local ballot questions and referenda that could have a direct impact on our business (such as those dealing with Medicaid expansion). We are committed to complying with applicable federal, state and local laws in connection with our political spending and have an active political action committee, CentenePAC. All of the contributions made by CentenePAC are derived from voluntary employee contributions; Centene makes no contributions. We do, however, pay the solicitation and administrative expenses of the PAC, which are minimal, as permitted by law. Political contributions made by Centene and/or CentenePAC must comply with all applicable laws and regulations and adhere to Centene’s Political Contributions Policy and our Corporate Business Ethics and Code of Conduct.

Centene’s political contributions are governed by extensive federal, state and local laws and regulations, including detailed disclosure requirements, including requirements to file reports with appropriate agencies on lobbying-related activities and expenditures. For example, certain information with respect to contributions made by CentenePAC is publicly available at the [Federal Election Commission’s website](#). Centene also discloses certain information relating to its political contributions and activity in its Political Activity Report.

Centene belongs to many trade associations. While we do not always share or agree with all of the views espoused by such organizations, we believe they are often helpful for the purpose of building a consensus among organizations with similar interests and advocating in favor of those interests.

Centene regularly reviews the costs and benefits of its memberships in trade associations. In addition, trade associations are subject to public disclosure obligations with respect to their lobbying and political contributions and expenditures. Information about Centene's trade associations and lobbying activities, including contributions required to be disclosed under the Lobbying Disclosure Act, is publicly available on the [Senate website](#).

Political contributions made by Centene and/or its PACs: (i) comply with applicable laws and regulations in the jurisdictions in which the contributions are made (including the United States Foreign Corrupt Practices Act and the Lobbying Disclosure Act); and (ii) adhere to the [Political Contributions Policy](#), [Federal Lobbying Activities Policy](#), and the [Corporation Business Ethics and Code of Conduct](#). Any political contribution made by Centene must be approved in advance by the office of the Senior Vice President for Government Relations, which is responsible for ensuring compliance with law as well as coordinating input and advice from those with knowledge of the communities in which we operate. Because of state and local "pay-to-play" laws that could directly affect Centene's government business, it is our policy for officers and other designated employees to receive preclearance when they or their spouse or civil union partner or minor child proposes to make a nonfederal contribution or engage in fundraising for a nonfederal candidate. Political contributions made by Centene and/or its PACs are reviewed by an external party to ensure compliance with federal and state laws and reporting requirements. An external party performs an annual compliance review to ensure adherence to Centene's government relations policies.

On an annual basis, Centene facilitates training for its lobbyists, consultants and business unit leaders engaged in government relations activities that includes a mandatory ethics training instructed by an external law firm.