

Humana Inc Supplier Code of Conduct

Humana Inc. (“Humana”) is committed to operating with the highest standards of ethics, integrity, and accountability in serving our members, patients, employees, shareholders, and communities. We expect our suppliers, contractors, consultants, and business partners (“Suppliers”) to share these same values and to conduct business responsibly, fairly, and in compliance with all applicable laws and regulations.

This Supplier Code of Conduct (“Code”) sets forth Humana’s expectations for Suppliers and their subcontractors. Compliance with this Code, including materials incorporated herein by reference, is a condition for doing business with Humana.

Ethical Business Practices

Integrity and Fair Dealing: Suppliers must conduct business honestly and transparently, avoiding conflicts of interest, corruption, bribery, or fraudulent practices. Suppliers with associates, employees or employees’ close relatives, friends or immediate family members working for Humana shall disclose these potential conflicts of interest before engaging in any business relationship. Humana’s Ethics Every Day Policy is incorporated within this Code by reference.

Anti-Corruption: Suppliers must not offer, promise, authorize, or provide anything of value intended to improperly influence business decisions or gain an unfair advantage. Suppliers must comply with all applicable anti-corruption laws and regulations. Humana’s Anti-Corruption Statement is incorporated within this Code by reference.

Fair Competition: Suppliers must comply with all applicable antitrust and competition laws and shall not be involved in anticompetitive agreements with competitors.

Gifts, Entertainment, Hospitality, Gratuities, and other favors: Suppliers shall prohibit the provision or receipt of any payments, gifts, gratuities, hospitality, meals, or entertainment intended to obtain or retain an improper business advantage or that could be perceived as bribery or kickbacks, whether directly or indirectly. Additionally, Suppliers shall not provide anything of value to Humana employees, government/regulatory officials or any other third party in any situation in which it might inappropriately influence, or appear to influence, the employee’s or regulatory official’s decision concerning the Suppliers.

Legal and Regulatory Compliance

Suppliers must comply with all applicable federal, state, and local laws, including but not limited to:

- Healthcare regulations (CMS, HIPAA, HITECH, Medicare, Medicaid).
- Data privacy and protection requirements.
- Labor, employment, and human rights laws.
- Environmental, health, and safety regulations.

Human Rights and Labor Standards

Humana is committed to human dignity and respect in the workplace. Suppliers are expected to:

- Prohibit forced, bonded, and child labor.
- Provide fair wages, benefits, and working hours in accordance with applicable laws.
- Ensure a workplace free of harassment, abuse, and unlawful discrimination.
- Respect employees' rights to freedom of association and collective bargaining.

Inclusive Practices

Humana values diverse perspectives and efforts to shape a more inclusive and effective healthcare system. Suppliers are encouraged to:

- Promote inclusion within their workforce.
- Support diverse suppliers (e.g., small, minority-owned, women-owned, veteran-owned, disability-owned, LGBTQ+-owned businesses, HUB Zone and small businesses).
- Align with Humana's Supplier Diversity Policy.

Health, Safety, and Well-Being

Suppliers must provide safe and healthy working environments that:

- Protects employees from known hazards.
- Complies with applicable occupational health and safety laws.
- Encourages wellness and well-being consistent with Humana's values.

Responsible Sourcing

Suppliers are expected to source responsibly and avoid contributing to:

- Human rights abuses in their supply chains.
- Use of conflict minerals or unethical raw material sourcing.

Environmental Sustainability

Suppliers are expected to act as good corporate stewards of the environment. Humana encourages its suppliers to adopt environmental strategies aimed at reducing environmental impact and supporting sustainable practices within their business operations, including:

- Compliance with environmental state and federal laws and regulations.
- Efficient use of natural resources.
- Reduction of greenhouse gas emissions and waste.
- Alignment with Humana's environmental and Scope 3 sustainability initiatives.
- Accurate reporting and disclosure of environmental metrics and practices.

Data Privacy, Information Security, and Artificial Intelligence

Suppliers entrusted with Humana data, including personal health information (PHI) and personally identifiable information (PII), must:

- Protect sensitive data through appropriate administrative, technical, and physical safeguards.
- Comply with HIPAA, HITECH, and all applicable privacy and cybersecurity regulations.
- Report any data breaches or unauthorized disclosures immediately.

Suppliers shall comply with the highest standards on use of artificial intelligence in terms of data governance, data integrity, data privacy, and ethics. Suppliers shall comply with all applicable laws and regulations. Suppliers shall provide accurate and truthful information to authorities when required.

Monitoring and Compliance

Humana reserves the right to assess, or have conducted on our behalf, audits of Supplier facilities and business practices to monitor compliance with this Code.

Upon request, suppliers shall provide written documentation of actions undertaken to evidence the fulfillment of any and all of the requirements identified in this Code of Conduct. Upon receipt of reasonable advance notice, suppliers shall facilitate and fully cooperate with the realization of any assessment, audit, or inspection by us, or our representative, of your facilities and/or business practices.

Based on the findings of any such assessment, audit, or inspection, Suppliers shall implement prompt corrective actions for any non-compliance. Failure to comply may result in reduced business, suspension, or termination of the relationship.

Reporting Concerns

Suppliers are required to report concerns, suspected violations, unlawful conduct or unethical behavior related to its business with Humana under this Code. Retaliation against anyone who raises a concern in good faith is strictly prohibited. Reports can be made to Humana through the following mechanisms:

- Ethics Help Line (**available 24/7, anonymous reporting permitted**) – Call the Ethics Help Line at **1-877-5-THE-KEY (1-877-584-3539)** or visit **ethicshelpline.com**
- Ethics and Compliance Office – contact via email at **ethics@humana.com**

Notwithstanding an executed agreement between the Parties which addresses the terms of this Supplier Code of Conduct and thereby supersedes the terms herein, by engaging in business with Humana, Suppliers acknowledge and agree to uphold the principles and requirements outlined in this Supplier Code of Conduct.

HUMANA RESERVES THE RIGHT TO TERMINATE BUSINESS WITH ANY BUSINESS PARTNER THAT FAILS TO COMPLY WITH THIS CODE OR WITH APPLICABLE LAWS AND REGULATIONS.

Humana Inc.

Ethics & Compliance | Enterprise Procurement & Supplier Management