Position statement

At UnitedHealth Group, <u>our mission and values</u> drive our commitment to transparent, honest and ethical marketing across our businesses. Health care is among the most personal and intimate aspects of everyone's life. Each day, we put the needs of those we serve first, one person and one interaction at a time, building trusting relationships and customer loyalty. Our communications reflect our commitment to making health care work for everyone.

The UnitedHealth Group <u>Code of Conduct</u> guides us in our work and reminds us of our accountability to the people and organizations we are privileged to serve. Our enterprise's marketing activities follow our highest ethical standards of integrity, honesty, respect, responsibility, and compliance with the laws and regulations that govern our business activities around the world.

We also are committed to helping to create a modern, high-performing health system by improving health care access and affordability, enhancing the health care experience and achieving better health outcomes for the individuals and organizations we serve. We present information in a clear, truthful, and professional manner as we work to meet the biggest industry challenges head on and provide people, care providers, businesses, communities, and governments with innovative products and complete end-to-end offerings.

Components of Ethical Marketing

As outlined in the UnitedHealth Group <u>Sustainability Report</u>, our materials are factual, honest, straightforward descriptions of the services we offer, enabling members to make informed decisions about their health care. We are committed to inclusion and diversity in our marketing practices, and rely on and harness evidence-based, data-driven content.

Our sales and marketing activities serve our business objectives, foster enduring relationships with those we serve – including our members, health care professionals, customers, employers and consumers – and build trust individual-by-individual. Accordingly, we will not mislead in our statements or claims, and only authorized individuals will speak on behalf of the enterprise. We are committed to being truthful, accurate and balanced, and will not use fine print inappropriately. We are also committed to:

- Avoiding unfair commercial practices and coercive tied selling.
- Selling suitable products and services to clients that are consistent with their risk profile.
- Providing customers with detailed information about products, services and associated risks and benefits.

We developed the <u>Just Plain Clear® Glossary</u> — which defines thousands of health care terms in easy-to-understand language — and leverage the tool to improve our own marketing and communications efforts. This resource is also available externally for use by other health care stakeholders, and includes all of the words in the Uniform Glossary, which comprises commonly used health coverage and medical terms and was jointly created by the U.S. Departments of Labor and Health and Human Services.

Maintaining the privacy and security of personal information that we collect, use, or that is entrusted to our care is also an essential component of UnitedHealth Group's mission and our commitment to integrity and ethical behavior in our actions, including marketing and communications.

- We are a highly regulated industry. We regularly train and require our employees to recognize that part of their day-to-day responsibilities may include access to and use of someone's personal information and to observe our policies, practices, and standards.
- Our employees' access, storage, or disclosure of personal information is to accomplish business objectives, in a secure manner appropriate to the sensitivity of the information and applicable law or policies.

Our <u>Supplier Code of Conduct</u> reinforces our commitment to applying and promoting socially responsible practices that respect and protect the personal dignity, privacy, and rights of our clients, employees, and stakeholders. This Code is a set of standards for ethical and legal business practices that we require and expect our business partners to abide by when conducting business activities with us or on our behalf, including marketing and communications efforts.

Marketing Operations

External marketing materials and communications related to our products and services that are directed to members, health care professionals, customers, employers and consumers are proactively reviewed by UnitedHealth Group's business segments to ensure they are truthful, accurate, and complete, and comply with applicable laws, regulations, and company policy.

Applicable laws and regulations include the <u>Centers for Medicare & Medicaid Services</u>
<u>Marketing Guidelines</u>, Food and Drug Administration regulations, Federal Trade
Commission regulations and state departments of insurance regulations.

The review process is a collaborative effort by compliance, privacy, and legal teams supporting business activities across the enterprise. Materials reviewed include client presentations and proposals, member communications and explanations of benefits, training and educational materials, as well as marketing materials directed to a range of audiences.

Summary

The reputation of UnitedHealth Group and all of our related companies stands upon the relationships we maintain with the public, the press, and all who are touched by our company. Our business environment is dynamic, and we are dedicated to maintaining the accuracy of our marketing and communications efforts, reflecting our values and our commitment to high standards of personal and institutional integrity.