

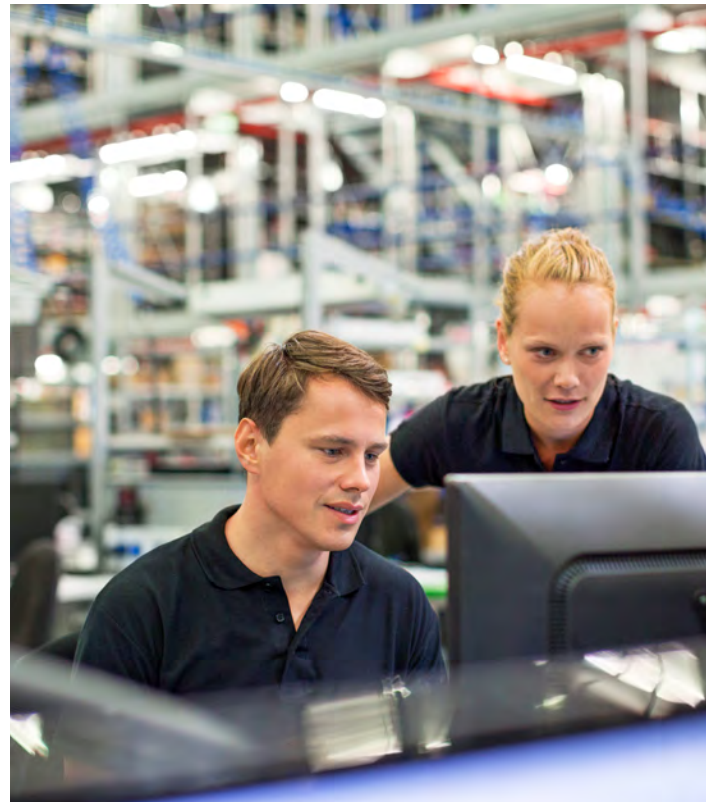
Responsible Business Practices



More than 40 years developing strong and effective governance practices.

UnitedHealth Group's management structure and responsible business practices, developed for over 40 years, supports our ability to help build a modern, high-performing health system.

Our principles of ethics and corporate governance outline the behaviors and responsibilities that provide the foundation for our actions, how we protect entrusted data, and the expectations we set for our suppliers. These practices ensure we are working to achieve our mission consistent with our values and those of society at large.



What we're focused on

- Maintaining strong and effective corporate governance to drive sustained shareholder value and respond to the interests of our shareholders.
- Adhering to our values through compliance and ethics principles that guide our behavior and help us remain a trusted partner.
- Maintaining data privacy and cybersecurity, recognizing our obligation to build and maintain the trust and confidence of our stakeholders and customers and ensuring we can protect the information of all those we serve.
- Partnering with suppliers to maximize value in our supply chain to ensure we buy the right goods and services from the right suppliers for the right price, in a timely manner.
- Committing to supplier diversity by developing a supplier base that reflects the communities and customers we are privileged to serve.
- Utilizing machine learning and artificial intelligence to ensure technology is developed, deployed and monitored ethically and responsibly, and is aligned with our mission.

Corporate governance

Strong and effective governance practices are essential to UnitedHealth Group's long-term value creation.

Upon the election of the 2022 director nominees, the average tenure of our board will have dropped from 12.6 years to 6.6 years since our 2021 annual meeting.

2021

12.6 years

2022

6.6 years

Our board has enhanced governance policies over time to align with best practices, drive sustained shareholder value and respond to the interests of our shareholders.

The Board of Directors Governance Committee reviews corporate governance practices at least annually and recommends modifications to the board for approval to strengthen our governance. Additional information on our corporate governance policies and board committees is available in our [proxy statement](#) and on our [Corporate Governance webpage](#).

Board composition

We believe an effective board consists of a diverse group of individuals who bring a variety of complementary skills and a range of personal and business experience to their positions. The collective experience of our directors covers a wide range of geographies and industries, including health care and clinical practice, insurance, consumer products, technology, capital markets and financial services, and roles in academia, corporate governance, government, intergovernmental organizations and business leadership.

The board's diversity is considered in the director nomination process and assessed annually when the board evaluates overall effectiveness. We are committed to actively seeking women and racially/ethnically diverse director candidates. Upon the election of the 2022 director nominees, our board will be 25% female independent directors and 38% racially/ethnically diverse independent directors. Our directors may serve on three other public company boards and our CEO may serve on one other public company board.

We strive to maintain a balance of tenure on the board. Long-serving directors bring valuable experience with our company and familiarity with the successes and challenges the enterprise has faced over the years, while newer directors contribute fresh perspectives.

Independent board leadership is another important component of our governance structure. We separate the positions of CEO and chair, and our bylaws require the company to have either an independent chair of the board or a lead independent director.

Shareholder rights

We value and respect the rights of our shareholders and have implemented strong shareholder practices. Our directors are elected annually by a majority vote of our shareholders. UnitedHealth Group does not have a dual-class share structure and no supermajority shareholder approval provisions, as each share of common stock is entitled to one vote.

We do not allow shareholders the right to purchase additional shares at a discount in the event of a takeover attempt. Shareholders can call a special meeting and act by written consent. Our bylaws also contain proxy access with standard market provisions. Directors are subject to a conflicts of interest policy and tender an irrevocable offer to resign if they do not receive majority support. From there, the board will accept, absent a compelling reason.

Say on Pay

Having received a 72% “For” vote on our annual Say on Pay proposal last year, as compared to an average of over 95% support from 2011 through 2020, we sought feedback from shareholders to better understand what motivated their votes and what actions we could take to address topics relating to our executive compensation program.

We were pleased to hear shareholders indicate their strong support of the overall design of our executive compensation program as well as the company’s overall pay-for-performance philosophy. To be responsive to shareholder feedback, we took a set of responsive actions to concerns raised by shareholders, which can be found in the [proxy statement](#).

Compliance and ethics

At UnitedHealth Group, we understand our tremendous responsibility to do what is best for the health and well-being of the millions of people we are privileged to serve.



Our values – integrity, compassion, relationships, innovation and performance – guide our behavior and help us maintain the trust that comes with this responsibility.

By adhering to our values, we are well-positioned to achieve our mission to help people live healthier lives and help make the health system work better for everyone.

Our [Code of Conduct](#) provides guidelines that help us sustain the highest possible standards of ethical behavior. The Code of Conduct is published and available to employees in one of the official languages of every location where we operate, including Brazilian Portuguese, continental Portuguese, Spanish and English. The code sets expectations for ethical conduct across our company, including but not limited to:

- Integrity
- Accountability
- Fair Competition and Fair Dealing
- Privacy and Information Security
- Our Assets and the Environment
- Government Interactions
- Communications
- A Safe and Supportive Working Environment

The expectations set forth in our Code of Conduct provide a clear guide for our employees to navigate potentially challenging ethical situations, including corruption and bribery, discrimination, confidentiality of information, conflicts of interest and anti-competitive practices. The code describes how to report misconduct, whistleblower legal protections, reporting confidentiality and help line contact information, how the company reports violations (including termination and possible legal action), non-retaliation principles, fair dealing, and the protection and proper use of personal information and company assets.

The Code of Conduct applies to all employees, contractors and subsidiaries. Our entire global workforce, including independent contractors and part-time employees, receives periodic training on our code and other ethical standards. New team members complete training on the code as part of their onboarding, and employees confirm annually they have read the code and adhere to its principles. UnitedHealth Group's policy is to provide a respectful work environment that is free from all forms of harassment, including sexual harassment.

Governance

Senior leadership oversees our Compliance and Ethics program and provides regular reports to the Audit and Finance Committee of the UnitedHealth Group Board of Directors that detail performance on key compliance and ethics indicators. UnitedHealth Group's Internal Audit department provides objective audit and advisory services that identify and mitigate risks throughout the company, including periodic audits of the Compliance and Ethics program. UnitedHealth Group's Compliance and Ethics Office maintains our code, reviewing it regularly to ensure continued support of our commitment to integrity and good corporate conduct.

96% of employees agreed that the compliance and ethics training provided them with adequate information to operate in compliance with the policies, laws and regulations associated with their job.

96%

Compliance and ethics policies and related documents

Compliance and Ethics Assessment

Periodically, UnitedHealth Group engages external consultants to assess the enterprise Compliance and Ethics program against government compliance guidance, regulatory expectations and industry practices to evaluate program effectiveness.

In addition, UnitedHealth Group, UnitedHealthcare and Optum conduct regular assessments consistent with the Department of Health and Human Services Office of Inspector General and Centers for Medicare and Medicaid Services requirements, Department of Justice guidance and other applicable regulatory requirements.

In 2022, our Compliance and Ethics team began building an interactive cloud repository to automate input from our business partners and aggregate results, reaching a broader group of individuals who provide insight.

UnitedHealth Group maintains internal policies at the enterprise, business segment and department levels that provide more specific direction beyond the core elements of the Code of Conduct.

Examples of key compliance and ethics policies include:

- Anti-Corruption Policy
- Anti-Kickback Policy
- Antitrust Policy
- Conflicts of Interest Policy
- Economic Sanctions and Sanctions Monitoring Policy
- False Claims Acts Compliance Policy
- Gifts and Entertainment Policy
- [Human Rights Policy](#)
- [Environmental Health and Safety Policy](#)
- Insider Trading Policy
- Interactions with Pharmaceutical, Medical Device or Biotech Manufacturers, Wholesalers or Distributors
- Non-Discrimination Policy
- Non-Retaliation Policy
- Personal Information Privacy and Data Protection
- Reporting Misconduct
- [Political Contributions Policy](#)
- Outside Directorships Policy
- [Related-Person Transactions Approval](#)
- Social Media Policy and Guidelines
- [Statement of Ethical Marketing](#)
- Travel and Expense Management Policy
- U.S. Federal Government Contracting Policy

Human rights

UnitedHealth Group believes supporting human rights is core to advancing our mission to help people live healthier lives and help make the health system work better for everyone. We are committed to a company culture that embraces inclusion, diversity, innovation and growth while upholding the highest ethical standards in how we operate internally and externally. One way we demonstrate this commitment is to require all employees to complete either a manager or employee training course covering sexual and other harassment and discrimination.

In keeping with the spirit of the United Nations Guiding Principles for Business and Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, our commitment extends to respecting the human rights of all those with whom we engage and employ. See our [Human Rights policy](#) for more details.

We engaged a third party to conduct a Human Rights Impact Assessment in 2022. This work helps us understand the human rights impact associated with our operations, value chain and business relationships. We will engage stakeholders to prioritize our impact and develop a plan for ongoing monitoring.

Whistleblower protection

We strongly and broadly encourage employees to raise compliance and ethics concerns, including concerns about accounting, internal controls, auditing, and ethical, legal, regulatory and policy matters. We offer several channels for employees and third parties to report compliance and ethics concerns or incidents, including contacting a reporting manager and compliance officers, and dedicated phone lines and email addresses controlled by our Compliance and Ethics Office and our Compliance and Ethics HelpCenter (EthicsPoint).

Individuals may choose to remain anonymous in jurisdictions where anonymous reporting is permissible. Once an investigation concludes, the Compliance, business, Human Capital and Legal leads associated with the case discuss potential disciplinary actions, if necessary, to determine whether disciplinary action is consistent with similar cases across the enterprise and ensure uniformity in disciplinary decisions.

We prohibit retaliatory action against any individual who, in good faith, raises concerns or questions regarding compliance and ethics matters, reports suspected violations, or cooperates in an investigation. We train all employees annually, and periodically remind them regarding how they may report possible ethics or compliance issues and their affirmative responsibility to report any issues.

Third party due diligence

Due diligence is required prior to engaging third parties that provide goods or services to UnitedHealth Group outside the U.S. The level of due diligence required will depend on the risks presented by each third party. The following reviews are performed for all prospective third parties that will provide goods or services to UnitedHealth Group outside the U.S.:

- All third parties are screened through World Check, the company's current online screening tool, to determine if there is a match with a person or entity in the World Check database.
- Third Party Red Flag Considerations are reviewed to determine whether any red flags are present.
- Whether the third party will interact directly or indirectly on behalf of UnitedHealth Group with public officials or public entities.

The following additional requirements apply to Higher Risk Third Parties:

- The UnitedHealth Group International Compliance group determines whether the third party being considered is a Higher Risk Third Party. When making its determination, UnitedHealth Group International Compliance may consider other available information, such as the nature and value of the services or products to be provided, and the reputation for corruption or bribery of the country in which the services or products will be provided.
- The engagement of the third party cannot proceed without the written approval of UnitedHealth Group International Compliance. This approval may include conditions upon which the engagement may proceed.

Ethical marketing and communications

Our communications with customers, members, employees, clinicians and other stakeholders reflect our values and commitment to high standards of personal and institutional integrity. Our sales and marketing activities serve our business objectives, foster enduring relationships with our stakeholders and build trust one person at a time. Our reputation stands upon the relationships we maintain with the public, the media and those who interact with our company.

We review all marketing materials to ensure accuracy, clarity and compliance with applicable laws and regulations, such as the Medicare Communications and Marketing Guidelines established by the U.S. Centers for Medicare & Medicaid Services. These materials seek to provide straightforward descriptions of services offered so our members can make informed decisions about their health care.

Supply chain management

UnitedHealth Group partners with suppliers integral to helping us achieve our mission.

UnitedHealth Group purchases pharmaceuticals and health care products through our direct suppliers and other goods and services through our indirect suppliers.

Our procurement departments collaborate with our business segments to identify, engage and manage our supplier base to meet business objectives, enable growth and mitigate risk for UnitedHealth Group and the individuals we serve. We maximize value in our supply chain by creating competitive markets for our internal business needs to ensure we buy the right goods and services, from the right suppliers, for the right price, in a timely manner.



Risk management

UnitedHealth Group has an enterprisewide Supplier Risk Management Program governed by an Enterprise Vendor Risk Committee. This group oversees the Supplier Risk Management Program with common standards, including regulatory and compliance requirements, applicable to suppliers participating in the health care value chain.



Sustainable procurement

We are committed to addressing the negative impact the changing environment has on human health, including in the supply chain. For that reason, we have made climate risk a key component of our ongoing sustainable procurement activities. We collaborate with the CDP (Carbon Disclosure Project) to retrieve qualitative and GHG emissions data from targeted suppliers to establish a baseline from which future reduction goals will be developed. The targeted suppliers represented roughly 35% of our centrally managed procurement spend in 2021 and account for a material basis of GHG emissions across our spend categories. We will use this data to inform our GHG scope 3 inventory baseline measurement in 2022 and engage our suppliers on climate risks and opportunities going forward. See [page 62](#) for a further discussion.

In parallel with establishing our scope 3 inventory, we engaged a third party to conduct a supply chain ESG risk assessment to strengthen collaboration with key suppliers and manage sustainability risks. This assessment includes ESG and modern-day slavery criteria to assess our suppliers and inform our sustainable procurement program refinement in 2022.

Our expectations

UnitedHealth Group recognizes that we play an important role in advancing responsible environmental and social sustainability practices across our supply chain. We expect our suppliers to comply with our Supplier [Code of Conduct](#), which touches on various social and environmental items and references requirements within our standard procurement contract language.

Because UnitedHealth Group is entrusted with the protection of individuals' most sensitive and personal health data, we place the utmost importance on protecting our data and information systems. We require suppliers with access to our information systems, customer data, or health plan member data to have the appropriate security controls when doing business with us, including maintaining their HITRUST certification or an acceptable third-party validated assessment.

Measuring supplier performance

We ensure key suppliers meet our performance expectations through a systematic Supplier Performance Management Program that monitors compliance with our Code of Conduct and monthly performance of contractual Service Level Agreements related to service delivery, quality and value delivery.

Data-driven supplier performance scorecards are shared quarterly with executive leadership to identify performance trends and areas of opportunity to drive improvement plans for underperforming suppliers. Suppliers are evaluated on criteria such as financial stability, cybersecurity and regulatory compliance, organization resiliency, diversity participation and Net Promoter Score.

Annually, we review the sustainability practices of critical suppliers to identify policies, practices and goals for waste and carbon reduction, recycling and other sustainability measurements. In 2021, we reviewed suppliers' sustainability performance representing 29% of our Enterprise Sourcing & Procurement program spend.

Supplier diversity

UnitedHealth Group's supplier diversity program seeks to proactively integrate businesses from underrepresented communities into our supply chain, which creates a multiplier effect, including job creation and income for people in underserved communities.

That value creation extends beyond our businesses to positively impact the communities we serve and extends our societal impact beyond our members and customers.

We conduct an annual community impact assessment of our diverse supplier spending to better understand how our efforts are supporting local communities.

Supplier Diversity Partnerships and Recognized Certifications

- National Minority Supplier Development Council and 23 Regional Affiliates
- Women Business Enterprise National Council and 14 Regional Partner Organizations
- U.S. Department of Veterans Affairs
- National Veterans Business Development Council
- Disability:IN
- National LGBT Chamber of Commerce
- National Association of Women Business Owners
- Diversity Alliance for Science

UnitedHealth Group's supplier diversity program had its strongest year in 2021, driven by core metric improvement and maturing our key business processes and stakeholder engagement. Implementing effective control, enhancing reporting and process measurement, and broadly communicating the program's culture and objectives helped grow Tier 1 spend with certified diverse suppliers by 17% from 2020 to 2021.

\$3.8B

spent with diverse suppliers
over the past decade.

In 2021, our supplier diversity
program supported

9K+

local community jobs.

\$473M

in employee wages.

Our process

We recognize the importance of supplier diversity and are committed to ensuring diversity is an integral part of our strategic sourcing and procurement processes.

Every request for proposal (RFP) managed by the Enterprise Sourcing & Procurement (ES&P) team targets the inclusion of at least one diverse supplier, where available. We evaluate RFPs through a balanced scorecard that considers diversity alongside other key factors, including cost, quality and service delivery. Additionally, we build supplier diversity into ES&P category plans, and growth objectives are developed and tracked annually to ensure continued progress.

In 2021, we expanded our Tier 2 program efforts deeper into our supply chain by inviting more prime suppliers to participate in the program. Prime suppliers provide diverse vendors with opportunities to participate in subcontracts awarded in connection with UnitedHealth Group business. In 2021, our identified Tier 2 spending increased 36% year over year.

Supplier definitions

Tier 1 (Prime Supplier)

Submits invoices to the final customer, e.g., major corporation or government agency.

Tier 2 (Subcontractor)

Submits invoices to the prime supplier.

Building capacity of diverse suppliers

In 2021, we hosted our Diverse Supplier Summit, which brought more than 100 diverse and prime suppliers together with executives from UnitedHealth Group's Diversity, Equity and Inclusion Office, UnitedHealthcare, Optum and other corporate functions. The summit offered our suppliers insights on our strategic priorities and the role diverse suppliers have in helping us move our business and the health care industry forward. In addition, our leaders shared ways diverse suppliers can develop sustainable strategic partnerships with UnitedHealth Group business partners.

In 2020, we developed a pro bono accelerator model to help build the capability of diverse suppliers to grow their business with us and other companies. We piloted the program with a minority and woman-owned consultancy focused on clinical research in minority populations and health disparities.

In 2021, we expanded the program to five suppliers across several different demographic groups. Each supplier was paired with a project team as a mentor to assist in developing targeted capabilities, as defined by the supplier. We are actively working with the diverse suppliers to capture the impact of the accelerator program on their business.

Dragonfli Group

Dragonfli Group is a disability-owned business enterprise (DOBE) that participates in UnitedHealth Group's accelerator program. Glenn Ballard, Dragonfli's CEO, founded the cybersecurity firm in 2008. He engaged UnitedHealth Group to gain a fresh perspective from experts who have "been there" and who could share lessons learned from successes and failures.

Glenn was specifically looking for assistance in creating a new outreach and recruitment program to reach underserved populations while engaging current employees to assist in their upskilling and professional development.

"The mentor team at UnitedHealth Group has been incredibly helpful in working with us to identify practical solutions that expand our team's versatility and expertise while considering the unique components of this industry. The program helped turn some of our ideas into action by helping us navigate the challenging course of talent recruitment in a very competitive market."

Glenn Ballard, Dragonfli CEO

Data privacy and security

We believe health care data and related information should be used solely to improve individual health, advance health system performance and aid in new health care discoveries.

UnitedHealth Group receives personal information from or about individuals (such as health plan members, patients, customers, employees, or other persons whose information is provided to or received by UnitedHealth Group or its business partners) as part of our day-to-day business activities. While health care data and information are critical to our ability to serve our customers and the health system, we recognize this information is highly sensitive and personal.

As a result, we must build and maintain the trust and confidence of our customers and stakeholders, ensuring we can protect the information for all those we serve. We are required to safeguard personal information reasonably and appropriately and to use or disclose such information only as authorized by the individual or in compliance with all applicable laws. Primary tools used to fulfill these obligations are cybersecurity and data privacy programs.



Governance

UnitedHealth Group's chief information officer, chief compliance and ethics officer, chief privacy officer and chief information security officer are responsible for administering our data privacy and security programs at the executive management level. The Audit and Finance Committee of the Board of Directors reviews and assesses the effectiveness of UnitedHealth Group's policies, procedures and resource commitments in the areas of compliance, ethics, privacy and cybersecurity. The committee receives regular updates covering critical issues related to one or more of the following topics: our information security risks, cybersecurity strategy and business continuity capabilities.

In 2021, we established a Cybersecurity Leadership Council (CLC) to enable aligned executive ownership and delivery of information security initiatives across UnitedHealth Group. The chief information officer of each line of business or a chief information security officer will sponsor each initiative and lead implementation. The CLC will oversee analysis, risk tolerance, policy, funding and implementation of information security initiatives, and the transition to standard operating processes to ensure sustainability.

UnitedHealth Group manages cybersecurity and data protection through a robust framework that provides our team members with training and resources that support their day-to-day activities, assesses the risks our company faces, and establishes policies and safeguards to protect our systems and the information of those we serve.

Programs and resources

UnitedHealth Group's data protection policy applies to all lines of business and subsidiaries. Data is assigned a classification based on its sensitivity level and protected by security requirements defined by the policy. Data sent externally must meet security requirements outlined by our enterprise data-sharing processes such as management approval and strong encryption.

Our [Code of Conduct](#) outlines our commitment to protecting the information entrusted to us. Supported by a comprehensive set of principles, our policies and programs describe appropriate uses of data and the safeguards that protect the confidentiality and integrity of our systems, including:

- Enterprise information security policies.
- An enterprise resiliency and response program.
- An incident management program that encompasses cybersecurity, privacy and compliance obligations.
- Privacy and data protection policies, including guidance on information handling.
- An enterprise data governance program, including related policies.
- Enterprise risk management and information risk analysis programs.
- The Safe and Secure with Me employee training and awareness program – required annually for employees who handle Protected Health Information.

Program evaluation

We regularly evaluate the security maturity of our systems. This includes vulnerability assessments and penetration tests conducted by our internal team and qualified external assessors. These efforts allow us to identify operational and design risks and vulnerabilities in our systems. We use these tests to help us identify opportunities to address emerging security threats and improve system security as we work to enhance our ability to protect information and data.

UnitedHealth Group's IT infrastructure and information security management systems have been audited by internal and external auditors in the last fiscal year. These audits have resulted in certifications from industry-recognized certifying organizations such as HITRUST, International Organization for Standardization (ISO), System and Organization Controls (SOC) and the Payment Card Industry (PCI).

UnitedHealth Group manages a robust Information Security Risk Management and Privacy Program that improves its ability to make risk-informed decisions by conducting systematic and structured reviews of information security risks. Its protocols are based on industry practices and applicable regulatory obligations such as the Health Insurance Portability and Accountability Act (HIPAA), Gramm-Leach-Bliley Act (GLBA), European Union General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), and other requirements decreed by state, federal and international authorities.

Our Internal Audit team is engaged to advise on strengthening compliance with applicable laws and regulations. The team leverages a combination of auditing and security frameworks to evaluate how best practices are applied throughout our enterprise. This approach gives us the ability to address risk from multiple perspectives and implement layered remediation strategies. Furthermore, our Internal Audit team independently assesses security controls against enterprise policies to evaluate whether compliance is maintained. The results of internal audits are communicated to executive leadership and presented to the Audit and Finance Committee of the Board of Directors quarterly.

Audit findings are tracked in the form of action plans and managed within an enterprise governance, risk and compliance tool. Owners are assigned, remediation timelines are established and progress is regularly reported to senior management.

Risk assessment

Annually, we conduct an enterprise information risk assessment (EIRA) in conjunction with UnitedHealth Group's overall enterprise risk management assessment. In the EIRA, we complete a comprehensive review of internal and external threats and evaluate changes to the information risk landscape to inform the investments and program enhancements we will make in the coming year.

There continues to be heightened risk caused by sophisticated enhancements to ransomware and the creation of criminal networks and affiliates that extend the reach and skill of attackers. We continue to engage with our suppliers and internal development teams to remediate known vulnerabilities and are keeping a close eye on upgrades that can be leveraged to mitigate future risk.

UnitedHealth Group continues to monitor cyber threats and invest accordingly across our systems. We are investing in new capabilities to ensure rapid response and recovery from potential attacks, including system rebuild and recovery protocols to ensure key systems are restored fully and rapidly, a step beyond the current protocols of data center failover. Business continuity exercises are prioritized and focused on technology interruption due to ransomware.

Responsible use of artificial intelligence and machine learning

UnitedHealth Group uses artificial intelligence (AI) and machine learning (ML) in support of our mission to help people live healthier lives and help make the health system work better for everyone. We are committed to helping ensure that AI is developed, deployed and monitored ethically and responsibly across our company.

How artificial intelligence and machine learning is used

When developed and used responsibly, AI/ML can empower people with the information they need to make personal health choices, provide physicians with insights to assist their decision-making, and enhance the performance of the health care system. AI/ML can augment human tasks, assisting with disease progression management, including tailoring care decisions to individuals, identifying emerging risk of disease early, improving engagement and adherence, and improving efficiency and consistency of administrative processes.



Our principles

The health care industry as a whole is in the early stages of implementing AI/ML. As AI/ML solutions continue to evolve, it is important to ensure they are used responsibly by continuously assessing and improving our governance processes. We adopted the following principles as guideposts to develop, deploy and monitor our AI/ML solutions.

Mission-driven

Foster development and deployment of AI/ML and governance processes consistent with our mission.

Trust

Employ methods to test and monitor AI/ML integrity and reliability.

Fairness

Create procedures to assess AI/ML performance for possible bias.

Accountability

Establish measures and be prepared to act swiftly to address and remediate misuses or adverse outcomes.

Transparency

Enable reviews of data and AI/ML outputs.

Privacy

Safeguard data privacy in the design, deployment and use of AI/ML.

Governance

We established a governance structure consisting of leaders across UnitedHealth Group, UnitedHealthcare and Optum to provide oversight on strategy development and guidance for investments and capability development of AI/ML. This governance established foundational principles for the responsible use of AI/ML and a Responsible Use of ML program. The program is designed to provide a holistic and structured approach to using AI/ML responsibly.

In 2022, we will integrate the Machine Learning Review Board as a key component of the Responsible Use of ML program. The board will proactively review AI/ML models for bias and similar issues and advise analytics teams. The program will provide guardrails in the application of innovative solutions that advance the health care system.

As we move forward, we will supplement our foundational principles with a guide for all analytics teams to support consistent practices to responsibly develop and use AI/ML. The Responsible Use of ML program will make this guide available to all employees, along with training. We will develop a technology framework that standardizes and automates AI/ML quality checks for use across our enterprise.

Finally, we are engaging with industry and academic partners to review our best practices and to co-research and publish leadership for the benefit of the health industry.

We recognize that the use of AI/ML can have unintended consequences, including consequences that can arise from bias in the health care system, data or algorithms. We take steps throughout the design, development, deployment and monitoring of AI/ML to help mitigate bias. These steps include forming a team with a range of expertise to help identify potential issues, assessing the data and model for potential sources of bias and developing cross-discipline mitigation approaches to mitigate bias. We are developing processes for situations where bias or risks to health equity are found that may include suspending or delaying release of AI/ML until the risks are addressed through a mitigation plan.

Public policy

UnitedHealth Group engages in efforts to help shape and inform public policy decisions that ensure all people have access to high-quality, affordable health care. Our participation — including making bipartisan political contributions — is designed to improve the health care system and positively impact all of our stakeholders.

Our engagement

Our public policy engagement is focused on addressing the most pressing health care challenges and opportunities in the communities where we live and work. Public policy efforts are led by UnitedHealth Group's External Affairs organization, with engagement and partnership across UnitedHealth Group, including the Optum and UnitedHealthcare businesses.

We engage government officials at the federal, state and international levels, serving as a trusted and solutions-oriented voice in the important discussions about health care reform and modernization.

Our key areas of focus include:

- Developing and advancing public policy solutions.
- Conducting internally generated research to provide key insights on the most pressing issues facing the health system.
- Partnering with leading academic institutions to work jointly on health care research and data analysis efforts.
- Fostering strategic partnerships with key stakeholders on policy and advocacy initiatives.

Our priorities

We believe every person — regardless of race, gender, sexuality, age, location or income — deserves to be healthy. We are committed to helping ensure every person has access to high-quality, affordable health care that meets their unique health care needs and financial means. We support solutions that build on the strengths of today's health system and leverage innovative, proven, private-sector approaches and successful public-private partnerships.

Our U.S. policy priorities include:

Achieving universal coverage by strengthening and expanding existing coverage options and public-private partnerships. We believe that the 29 million uninsured individuals in the U.S. can be covered through Medicaid, exchanges and the individual market.

Improving health care affordability with the goal of reducing health care costs for consumers, employers, governments and the broader health care system. We believe this can be accomplished through a series of solutions, including transitioning to value-based care, addressing the high cost of prescription drugs and delivering more care at lower-cost sites of service with better clinical outcomes.

Enhancing the health care experience by expanding the use of secure digital tools that deliver personalized, actionable cost and quality information, streamlining and standardizing quality measurement and increasing workforce capacity by amending state and federal scope of practice laws.

Achieving better health outcomes by improving care quality to reduce the burden of disease. We believe improved health outcomes can lower health care costs by 40% by compensating providers for cost-effective, high-quality care, promoting evidence-based clinical approaches to care delivery and improving health literacy.

Political contributions

Political contributions are part of our efforts to advance solutions intended to ensure all people have access to high-quality, affordable health care. Our Political Action Committee is managed by a long-established governance process, which includes thorough review and approval of each contribution, and public disclosure of contributions in accordance with our political contributions policy, including publishing semi-annual political contribution reports on our website.

Our board's Governance Committee, which oversees our overall strategy on ESG policies and practices, has oversight of our advocacy and lobbying processes and activities, including key trade association and coalition memberships, as well as for the review of political contributions made by the company and its Political Action Committee.

UnitedHealth Group is recognized as a "Trendsetter" in the 2021 Center for Political Accountability-Zicklin Index of Political Accountability.

Governance

The Governance Committee of the UnitedHealth Group Board of Directors oversees the company's political contributions policy. The Health and Clinical Practice Policies Committee of the UnitedHealth Group Board of Directors oversees the company's policies, positions and practices concerning broad public policy issues, including those that relate to health care policy and regulatory issues.

UnitedHealth Group files federal lobbying disclosure reports quarterly with the U.S. Congress, and state lobbying disclosure reports with the appropriate state governing agencies and in compliance with applicable laws. Additional information on our public policy priorities can be found in [The Path Forward](#).