

# Responsible business practices



# UnitedHealth Group's governance practices support our mission and serve the needs of the communities in which we live and work.

## What we're focused on

- Maintaining strong and effective corporate governance to drive sustained value and respond to the interests of our stakeholders.
- Adhering to our values through compliance and ethics principles, which guide our behavior and help us remain a trusted partner.
- Partnering with suppliers to maximize value in our supply chain and help ensure we buy the right goods and services from the right suppliers for the right price, all in a timely manner.
- Committing to supplier diversity by developing a supplier base reflecting the communities and customers we are privileged to serve.
- Following a framework to help ensure technology, including artificial intelligence and machine learning, is developed, deployed and monitored ethically and responsibly in alignment with our mission.

Our management structure and responsible business practices enable us to help build a modern, high-performing health system. Our principles of ethics and corporate governance outline specific behaviors and responsibilities, which provide the foundation for our actions, influence how we protect entrusted data, guide our responsible use of artificial intelligence and machine learning, and provide the expectations we set for our suppliers. These practices help ensure we are working to achieve our mission with consistency and in alignment with our values and the values of society at large.

Our approach to governance guides and supports [our strategic growth priorities](#). For example, as we deploy new technologies to better serve patients and providers, we are continually evaluating our policies and procedures to help ensure safety, privacy and equity. Similarly, we also review our supplier risk and performance management processes to help ensure our suppliers can meet our sustainability standards and deliver on our values.



# Corporate governance

Strong and effective governance practices provide the foundation for our actions and help drive long-term value.

UnitedHealth Group is committed to best-in-class governance practices, which are embodied in our corporate governance policies. Our board has enhanced these policies over time to align with evolving best practices, which drive sustained value and help us respond to the interests of our stakeholders.

Our Governance Committee reviews corporate governance practices at least once per year and recommends modifications for the board's approval to strengthen and contemporize our approach. Additional information on our corporate governance – including policies, board committees and approaches to enterprise-wide risk management – 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 both personal and business experiences 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, along with roles in academia, corporate governance, government, inter-governmental organizations and business leadership.

The board's diversity is considered in the director nomination process and assessed annually when the board evaluates its overall effectiveness. The board's ongoing review of its composition and succession planning has resulted in substantial refreshment of its members in recent years, including an increase in their diversity of skills, attributes and perspectives. We are committed to actively seeking director candidates from underrepresented communities.

# 33%

female independent directors  
on our board

Upon the election of the 2023 director nominees, our board includes 33% female independent directors and 33% racially/ethnically diverse independent directors. To promote optimal board oversight and to help ensure our board members have adequate time to fulfill their duties as UnitedHealth Group directors, they may serve on no more than three other public company boards, and our CEO may serve on no more than 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. Upon the election of our 2023 director nominees, the average tenure of our board members will be less than seven years.

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. The duties for our lead independent director are outlined in our Principles of Governance. Michele Hooper, a nationally recognized corporate governance expert, has served as our lead independent director since October 2021.

## 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. Each share of common stock is entitled to one vote, and UnitedHealth Group has no dual-class share structure and no supermajority shareholder approval provisions.

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. If majority support is not achieved, the board will accept, absent a compelling reason.

## Say on Pay

Shareholders provided strong support of our Say on Pay proposal in connection with our 2022 annual meeting, with 94% of shares voting in favor of this proposal. In subsequent engagements, we continue to hear shareholders indicate their strong support for the overall design of our executive compensation program as well as our overall pay-for-performance philosophy.



# Data privacy and security

Implementing policies and programs to protect the sensitive data entrusted to us.

As part of our day-to-day business activities, 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. While health care data and personal information are critical for our ability to serve our customers and the health system, we recognize this information is highly sensitive and subject to increasing cybersecurity threats.

We believe a culture of transparency is essential to building and maintaining the trust and confidence of our customers and stakeholders.



## Governance

UnitedHealth Group's 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 our policies, procedures and resource commitments in the areas of compliance, ethics, privacy and information security. The committee, which is responsible for assisting the board in overseeing cybersecurity compliance, receives regular updates covering critical issues related to one or more of the following topics: our information security risks, cybersecurity strategy, supplier risk and business continuity capabilities.

UnitedHealth Group manages cybersecurity and data protection through a continuously evolving framework, providing our team members with training and resources. The framework supports 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, including all lines of business and subsidiaries, is required to handle data in accordance with data privacy and information security policies, privacy notices and applicable laws. These expectations extend to our third-party partners and contractors.

We use and collect a minimum amount of personal information and retain it in accordance with legal and contractual requirements. We obtain consent in compliance with applicable law and communicate opportunities to limit or opt out of data collection. We observe the rights individuals have over their personal information, including the right to access information we maintain about them and request a correction to those records. Our data privacy policies are informed by our values and further define our privacy responsibilities.

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 encompassing 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.
- Mandatory privacy and security training for all employees.
- Enterprise vulnerability management programs.

UnitedHealth Group continues to monitor cyber threats and invest accordingly across our systems. In 2022, the level of global cyber threats continued to increase, and we invested and continue to invest in new capabilities to help ensure rapid response and recovery from potential attacks, including system rebuild and recovery protocols so key systems are restored fully and quickly – a step beyond the current protocols of data center failover. Business continuity exercises are prioritized and focused on technology interruption due to ransomware. Finally, we also have a robust incident response program that manages any incident that occurs and remediates vulnerabilities and the effects on those we serve.

## Program evaluation

We regularly evaluate the maturity of our security systems. This includes vulnerability assessments and penetration tests conducted by our internal team and qualified external independent assessors. These efforts allow us to identify operational and design risks and vulnerabilities in our systems. We use these tests, along with lessons learned from actual security breaches, 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 were 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, System and Organization Controls and the Payment Card Industry.

UnitedHealth Group has established information security risk management and privacy programs, which improve our ability to make risk-informed decisions by conducting systematic and structured reviews of information security and data privacy risks. Our protocols are based on industry practices and applicable regulatory obligations such as the Health Insurance Portability and Accountability Act, Gramm-Leach-Bliley Act, European Union General Data Protection Regulation, California Consumer Privacy Act 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.

**We partner with an industry-leading cybersecurity firm to assess our cybersecurity program across both Enterprise Information Security and the broader Optum Technology teams. This assessment complements our other assessment work by evaluating our cybersecurity program as a whole.**

## Risk assessment

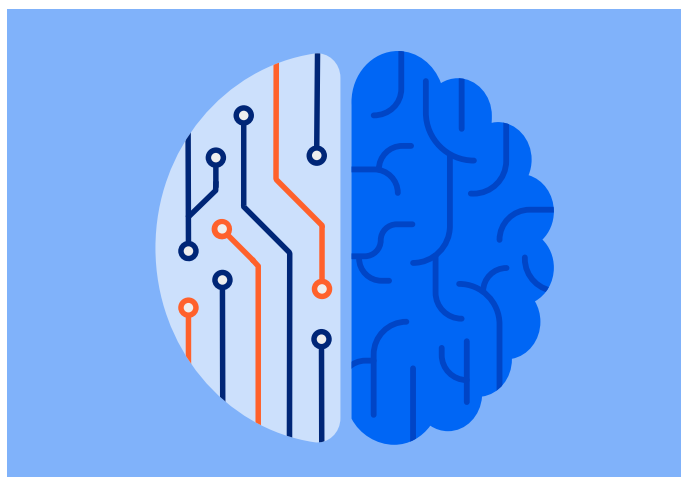
We conduct an annual enterprise information risk assessment (EIRA) in conjunction with our overall enterprise risk management assessment. In the EIRA, we complete a comprehensive review of internal and external threats and evaluate changes to the information risk landscape to inform the investments and 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 to extend the reach and skill of attackers. We continue to engage with our suppliers and internal development teams to remediate known vulnerabilities and are monitoring upgrades, which can be leveraged to mitigate future risk. We also engage our most critical suppliers to help ensure they employ appropriate and effective security controls and business continuity planning.

# Responsible use of artificial intelligence and machine learning

Committed to responsibly and ethically harnessing the potential of artificial intelligence and machine learning.

When developed and used responsibly, artificial intelligence (AI) and machine learning (ML) can empower people with the information they need to make personal health choices, provide physicians with insights to assist their decision-making and streamline the performance of the health care system. As these solutions continue to evolve in the health care industry, we are committed to assessing and improving our AI/ML practices continuously, based on our own learnings, industry best practices and regulatory guidance.



## Governance

Our governance structure – consisting of clinical, technology, privacy and legal leaders across UnitedHealth Group, Optum and UnitedHealthcare – provides oversight on our strategic development and investments in AI/ML.

Our Responsible Use of AI program, which includes the Machine Learning Review Board, supports all analytics teams with a holistic, structured and cross-discipline review of AI. In 2022, the board reviewed all AI/ML models with the highest potential for risk of harm and established review processes for vendor-acquired AI. In 2023, the board will complete a review of all AI/ML in the organization.

## Continuous improvement

We continue to help advance responsible AI/ML guidance and learning across the enterprise and with our partners. These efforts build on our work with key industry stakeholders and a health equity-focused external advisory board from the broader enterprise community. The board conducted a thorough review of our key program components, guidance documents and frameworks. We also seek to root out errors in data sources, addressing systemic biases and other issues potentially impacting our efforts to improve the health outcomes of all individuals. As new AI/ML technologies – including generative AI systems like ChatGPT – continue to emerge and evolve, our Responsible Use of AI program provides ongoing guidance on how they can be responsibly deployed across the UnitedHealth Group enterprise.

In 2023, we will build on this work with an external advisory board dedicated to the Responsible Use of AI program. To continue to evolve with the best available practices, we will also engage in external forums to cross-share our experiences with industry leaders.



# Supply chain management

## Supporting a sustainable supply chain to help build healthier, more equitable communities.

At UnitedHealth Group, we recognize the importance of advancing responsible environmental and social sustainability practices across our supply chain. Together with our suppliers, we work to support healthier communities and improve the environment. Our extensive supplier network consists of direct suppliers, from whom we purchase pharmaceuticals and health care products, and our indirect suppliers, who provide other important goods and services.

Our suppliers are held to standards reflecting our values and our intent to build a more sustainable and equitable supply chain. Our suppliers are expected to comply with our [Supplier Code of Conduct](#), which was updated to reflect our broader ESG ambitions within our standard procurement contract language. Additionally, 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.

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 obtain the right goods and services from the right suppliers for the right price, all in a timely manner.



## Risk management

UnitedHealth Group's enterprise-wide Supplier Risk Management Program is governed by an Enterprise Vendor Risk Council. 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.

To mitigate against supply chain disruptions, we engage in resiliency planning, including the identification of suppliers critical to our business functions, specifically in patient care and customer commitments. We also developed a process for coordinating critical supplier assessments, which are integrated into a comprehensive supplier profile and status report and can be shared across the organization, further helping us mitigate risks.



## Sustainable procurement

Our sustainable procurement strategy is informed by a supply chain ESG risk assessment, which includes broad-based ESG and modern-day slavery criteria. The assessment, conducted by a third party, strengthens collaboration with key suppliers and helps us manage sustainability risks.

Mitigating climate risk is a key component of our ongoing sustainable procurement strategy. Our suppliers will play an integral role in helping us reduce our environmental footprint. We are engaging a targeted group of our suppliers, representing 80% of our 2021 base year emissions, to gather qualitative and GHG emissions data to supplement our current spend-based emissions data. The data will be captured through CDP (formerly the Carbon Disclosure Project) and leveraged to further inform our engagement approach to more effectively address supply chain climate risks and opportunities moving forward.

## Measuring supplier performance

To help ensure key suppliers meet our performance expectations, we utilize a systematic Supplier Performance Management Program to monitor compliance with our Code of Conduct and monthly performance of contractual Service Level Agreements related to service delivery, quality and value delivery. Suppliers are asked to self-report performance against contractual service level agreements and key risk indicators on a monthly basis to allow business leaders to make informed decisions regarding sourcing initiatives.

Data-driven supplier performance score cards are shared quarterly with business leaders, risk colleagues and category managers 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, sustainability progress 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 2022, we reviewed suppliers' sustainability performance, which represented approximately 45% of our Enterprise Sourcing & Procurement program spend. Through these reviews we were able to gather primary GHG data among our suppliers, as well as feedback on how we can further collaborate to reduce our environmental impact, from setting decarbonization goals to using compostable products. We were also able to gain a more informed understanding of our suppliers' efforts to promote human rights and supplier diversity within their own networks.

For more information, please refer to the Healthy environment section on [page 34](#).



“Our purpose-driven approach to supply chain management leverages the expertise of our supply partners to help deliver extraordinary results to our customers while improving environmental and social outcomes in the communities we serve.”

**Darren Harmon**, Senior Director of Supplier Diversity & Sustainability, UnitedHealth Group

# Supplier diversity

Building a more inclusive society by integrating businesses from diverse and underrepresented communities.

By promoting job creation and income generation for people in underserved communities, UnitedHealth Group's supplier diversity program strengthens our supplier network while extending our societal impact beyond our members and customers.

## Supplier diversity partnerships and recognized certifications

- National Minority Supplier Development Council and 23 regional affiliates
- Women's Business Enterprise National Council and 14 regional partner organizations
- U.S. Department of Veterans Affairs
- National Veteran Business Development Council
- Disability:IN
- National LGBT Chamber of Commerce
- National Association of Women Business Owners
- Diversity Alliance for Science
- Metropolitan Economic Development Association

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

**In 2022, UnitedHealth Group initiated a partnership with the Metropolitan Economic Development Association (MEDA), a Minnesota-based Community Development Funding Institution providing integrated support services and capital funding to local BIPOC businesses. We are engaged in MEDA's Ascend Twin Cities program, an ecosystem of partners delivering business education and contracting relationships for BIPOC businesses. As an anchor company for the Ascend program, we will provide technical assistance and support to help potential vendors successfully navigate procurement processes and delivery.**

# \$4.8B

spent with diverse suppliers over the past decade.

**In 2022, our supplier diversity program supported**

# 7.7K+

local community jobs.

# \$569M

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. We are committed to doing more to improve the program.

For every request for proposal (RFP), we target the inclusion of at least one diverse supplier, when available. We evaluate RFPs through a balanced score card, which considers diversity alongside other key factors, including cost, quality and service delivery.

In 2022, we increased our engagement with prime suppliers participating in our Tier 2 program. Targeted prime suppliers are expected to incorporate supplier diversity into their own sourcing practices and provide diverse vendors with opportunities to participate in subcontracts awarded in connection with UnitedHealth Group. Our identified Tier 2 spending increased 17% year over year in 2022.

### 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

To further our commitment to supplier diversity and sustainability, UnitedHealth Group will host a Sustainable Procurement Summit in the second half of 2023, bringing together key executives representing our core business functions along with some of our top suppliers. The event will provide our suppliers with valuable insights on UnitedHealth Group's strategic priorities and the role they play in achieving them.

Our pro bono accelerator model, developed in partnership with our Optum Social Responsibility team, helps build the capacity of diverse suppliers to grow their business with us and other companies. By pairing diverse suppliers with experts within UnitedHealth Group, we aim to provide in-depth knowledge and guidance catered to the needs of each partner business. Since piloting the program in 2020, we have worked with numerous diverse suppliers in providing technical assistance and training to position them for sustainable success. In 2022, we worked with a minority-owned business and a disability-owned business enterprise, supporting a website redesign project and helping professionalize human resources capabilities.



“Optum’s volunteers lent us their digital expertise, resulting in a website revamp and increased sales leads. We collaborated for several months and could only have achieved our goals with the Optum team’s guidance.”

**Denene Jonielle Rodney**, CEO and Founder, Zebra Strategies

# Public policy

Working to inform public policy decisions to help ensure all people have access to high-quality, affordable health care and to build an improved, simplified experience for patients and providers.

## Our engagement

Our public policy engagement is focused on advancing solutions to expand access to care, improve health care affordability and enhance health care outcomes. Public policy efforts are led by the UnitedHealth Group External Affairs organization, with partnership from leaders across UnitedHealth Group 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.
- Advocating with policymakers to advance the company's public policy priorities.
- Fostering strategic partnerships with key stakeholders on policy and advocacy initiatives.

## Our priorities

We are committed to a future where every person has access to high-quality, affordable health care and a modern, high-performing health system helping to reduce disparities, improve outcomes and lessen the burden of disease.

We outline a set of comprehensive and actionable policy solutions to advance these priorities in [A Path Forward](#). Our U.S. public policy solutions include:

- Achieving universal coverage by ensuring continuity of coverage for those currently insured, enrolling people in the coverage for which they are currently eligible, completing Medicaid expansion and providing more affordable coverage options.
- Improving health care affordability by accelerating value-based care systemwide, using cost-efficient sites of service, making prescription drugs more affordable, and ending wasteful administrative spending to make health care more affordable for consumers and employers and more sustainable for all levels of government.
- Enhancing the health care experience by focusing on equity and reducing disparities, expanding and diversifying the health care workforce, empowering consumers with actionable information, and enabling clinicians to focus on patient care.

## Political contributions

Public policies impacting the people and communities we serve are always being considered in Washington, D.C., and in all 50 states. We believe it is our responsibility – on behalf of our customers, employees, the company and shareholders – to engage in the public policy arena. Our engagement – which includes making bipartisan political contributions in the U.S. – is focused on advancing solutions to expand access to care, improve health care affordability and enhance the health care experience.

The company's political action committee, the UnitedHealth Group PAC, is funded by voluntary, personal contributions from eligible employees and individuals. The PAC makes contributions to federal and state candidates and political committees on a bipartisan basis. All PAC contributions are disclosed regularly to the Federal Election Commission (FEC) and appropriate state agencies. In addition to filing regular disclosure reports with the FEC and applicable state agencies, we also disclose political contributions via [semiannual reports on our website](#), in accordance with our [Political Contributions Policy](#). Our bipartisan political giving comes with the understanding we may not agree with every position taken by each recipient of political contributions from the company on the many issues considered by policymakers and candidates for public office.

## Trade association membership

We are committed to engaging trade association partners as we work to advance our mission and public policy priorities. Our participation in select industry trade associations comes with the understanding we might not always agree with all positions held by the organizations, and we are committed to communicating and aligning on our priority public policy positions. We list our key trade association memberships in our [Political Contributions & Related Activity Report](#).

## Governance

Strong and effective governance practices are essential to our engagement in the policymaking process. The Governance Committee of the UnitedHealth Group Board of Directors has oversight of public policy engagement and political contributions. Its responsibilities include reviewing and recommending to the board any changes to the [Political Contributions Policy](#).

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.

# Compliance and ethics

Guided by our ethics and values to support our employees and the millions of people we serve.

By adhering to our values – integrity, compassion, relationships, innovation and performance – 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 to help us sustain the highest possible standards of ethical behavior. The code is available to employees in one of the official languages of every location where we operate, including Brazilian Portuguese, Spanish and English, and 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 and Marketing
- A Safe and Supportive Working Environment

Our policy is to provide a respectful work environment free from all forms of harassment, including sexual harassment. 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, maintaining confidentiality of information, avoiding conflicts of interest, and anti-competitive practices. The code describes how to report misconduct, applicable legal protections for whistleblowers, confidentiality in the reporting process, Help Center contact information, how the company treats code violations (including termination and possible legal action), non-retaliation principles, fair dealing expectations, and the protection and proper use of customer/member personal information and company assets.

The Code of Conduct applies to all employees, directors, contractors and subsidiaries. Our entire global workforce, including independent contractors and part-time employees, receives periodic training on our code and other key compliance policies. About 99% of employees<sup>8</sup> attest annually to the Code of Conduct. New team members complete training on the code as part of their onboarding, and all employees confirm periodically they have read the code and adhere to its principles.

<sup>8</sup> Includes corporate services integrated business only. Corporate services non-integrated businesses are excluded. See definitions on [page 90, About this report](#).



## Governance

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

**Approximately 95% of employees<sup>9</sup> agreed the compliance and ethics training provided them with adequate information to operate in compliance with the policies, laws and regulations associated with their job. We continuously work to update and improve our training with the input of subject matter experts and feedback from employees.**


 95%

## Compliance and ethics policies and related documents

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 its effectiveness.

In addition, UnitedHealth Group, Optum and UnitedHealthcare conduct regular assessments, leveraging technology to collect and aggregate insights from a wide group of leaders throughout the enterprise, consistent with the U.S. Department of Health and Human Services Office of Inspector General and Centers for Medicare & Medicaid Services requirements, Department of Justice guidance, and other applicable regulatory requirements.

UnitedHealth Group maintains internal policies at the enterprise, business segment and department levels, which 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 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

<sup>9</sup> Includes corporate services integrated business only. Corporate services non-integrated businesses are excluded. See definitions on [page 90, About this report](#).

## Human rights

We are committed to a company culture embracing inclusion, diversity, innovation and growth while upholding the highest ethical standards in how we operate both internally and externally. One way we demonstrate this commitment is by requiring 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 on Business and Human Rights and the International Labour 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.

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

Read more about our approach to human rights and the impact assessment in our [Human Rights Policy](#).

## 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, People Organization and Legal leads associated with the case discuss potential disciplinary actions, if necessary, to determine whether they are consistent with similar cases across the enterprise and achieve 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 of how they may report possible ethics or compliance issues, as well as their affirmative responsibility to report any issues.



## Third party due diligence

Due diligence is required prior to engaging third parties providing 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 providing goods or services to UnitedHealth Group outside the U.S.:

- All third parties are screened through an online tool leveraging one of the premier global databases for risk profiles on individuals and entities to determine if there is a match with a person or entity who is subject to government sanctions, involved in various regulatory or legal enforcement actions, or presents other compliance risks.
- Positive matches within the database for an entity or individual trigger additional review to address the potential issues posed by High Risk Third Parties.

The following additional requirements apply to High Risk Third Parties:

- UnitedHealth Group Compliance and Ethics determines whether the third party being considered is a High Risk Third Party. When making its determination, UnitedHealth Group Compliance and Ethics 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 Compliance and Ethics. 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 help 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.