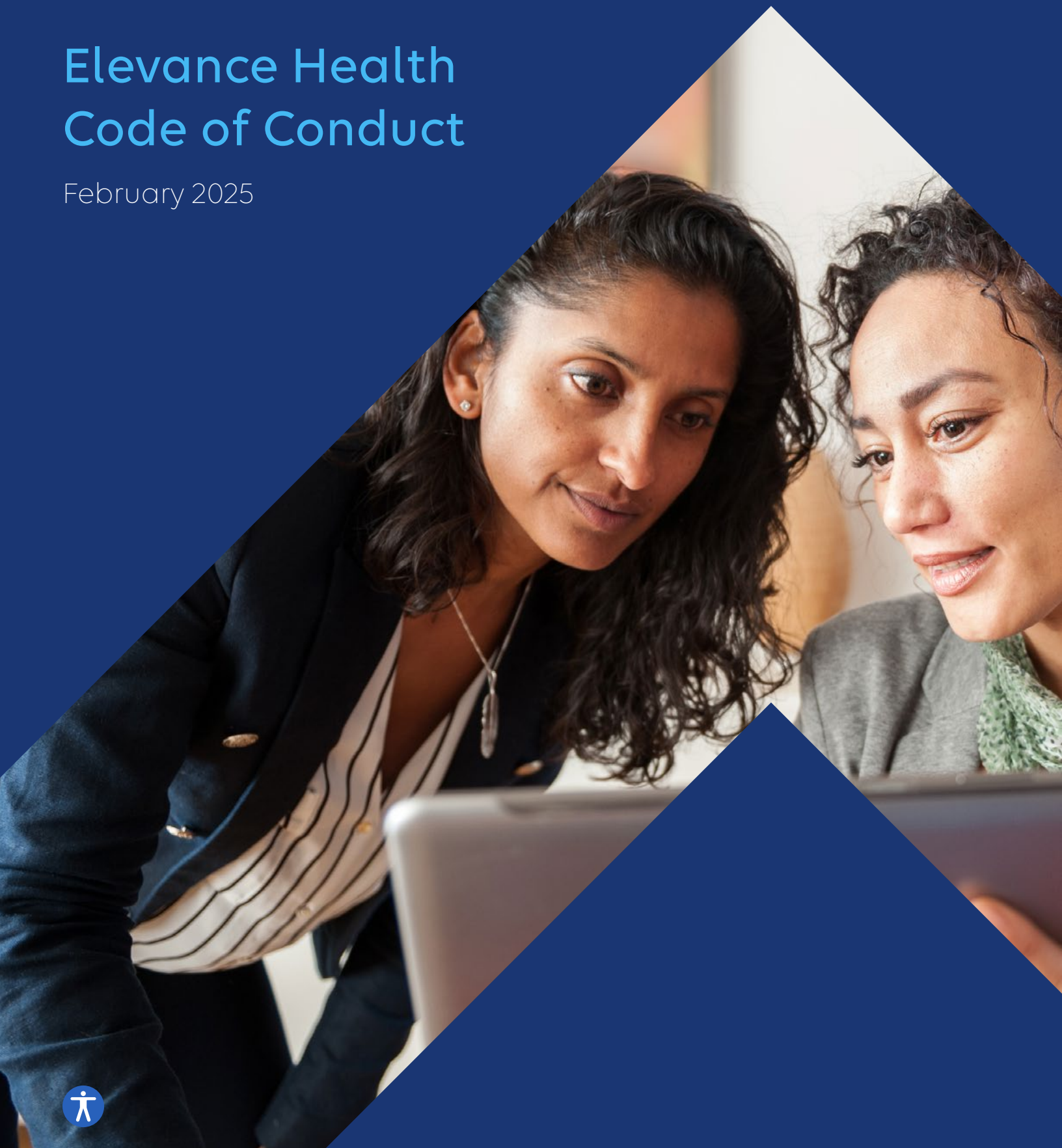
Elevance Health

Elevance Health Code of Conduct

February 2025



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Leading and Operating With Integrity

Elevance Health is a company grounded in ethical behavior. Each of us is responsible for creating a work environment that promotes accountability, integrity, and trust — for one another, as well as for the consumers, communities, care providers, shareholders, and regulators who depend on us.

The way we do business is as important as the outcomes we achieve. On our journey to become a *lifetime, trusted health partner*, it is imperative that we continue to exercise the highest standards of ethics and professional behavior and live by our **Code of Conduct**.

Our Code serves as the foundation of our Ethics, Compliance, and Privacy Program. Rooted in our value of Integrity, it provides clear guidelines for doing what's right and acting morally and responsibly in everything we do as Elevance Health associates. It helps us fulfill our commitments, ensure a high level of service and respect for others, build transparency and trust among our diverse stakeholders, and go above and beyond in service of our mission.

As a company, we demonstrate the Code through our active, responsible citizenship, including our commitment to The United Nations Global Compact, the world's largest corporate sustainability initiative. The compact is a call to companies everywhere to align their operations and strategies with universal principles and take actions that advance societal goals such as reducing food insecurity, advancing health and wellbeing, improving racial and gender equality, and mitigating climate change.

Please be sure that you read and understand the Elevance Health Code of Conduct. By thoroughly understanding the Code, you are doing your part to build upon Elevance Health's long-standing commitment to delivering the highest level of excellence in all we do. In addition, if you see something you believe is not in accordance with our Code, always speak up. We each have a responsibility to report unethical behavior, and we can do so knowing that retaliation of any kind is not tolerated. The Code outlines several ways to seek guidance or to anonymously report concerns.

As an enterprise, we can only fulfill our purpose of *improving the health of humanity* if we conduct our business with the highest ethical standards. Thank you for your continued commitment to doing the right thing, without compromise or hesitation, for all those we are privileged to serve.

Gail Boudreaux
President and Chief Executive Officer
Elevance Health

Our Purpose

Improving the health of humanity.

Our Mission

Improving lives and communities.
Simplifying healthcare. Expecting more.

Be Bold, Be Accountable

Elevance Health is on a bold journey to both simplify and improve the healthcare experience for all. Each of us is accountable and plays a key role in ensuring our collective success. The ways in which we perform our work, interact with our members, and collaborate with each other are integral building blocks of our culture here at Elevance Health. As we grow as a company, it is important to remember that we, as Elevance Health associates, have the opportunity to influence both our reputation and culture through our behaviors. Choosing to act ethically with integrity and living our values are fundamental to delivering on our mission.

Elevance Health's Code is the foundation of our Ethics, Compliance and Privacy Program. Each of us bring the Code to life by living our bold purpose of *improving the lives of humanity* every day, and by holding ourselves to the highest ethical standards, interacting in a highly open, honest positive manner, and being guided to do the right thing. Doing the right thing includes speaking up if you see something. Timely communication and escalation of issues allows us to identify and respond to emerging risks quickly, assess potential impact to Elevance Health properly, and remediate issues before they intensify.

As Elevance Health welcomes new associates and entities into our organization, the Code aids us by demonstrating the necessary elements of our culture. We are all required to read and understand how the Code explains our responsibility to promote an ethical and compliant workplace and utilize the Code to guide us and our work.

After reviewing the Code, if you have any questions, there are resources available to assist you:

- Your manager
- Call the Ethics and Compliance HelpLine:
  - From the United States: 877-725-2702
  - From India: 000-8000-4022-65
  - From Ireland: 1-800-300391
  - From the Philippines: 02-8299-3864
  - Worldwide: +1-317-287-5699
  - For FGS associates: 800-438-4427
- Submit an online report at elevancehealthethicshelpline.com
- Send an email to: ethicsandcompliance@elevancehealth.com
- Contact me directly at 732-340-6171

Please remember, as an Elevance Health associate, it is not only your right, but your duty to report any potential violation of our Code through one of the above resources. It is imperative that we all speak up to maintain the integrity of Elevance Health. All reports are taken seriously and any retaliation for reporting in good faith is strictly prohibited.

Thank you for the active role you play in creating and upholding an ethical and accountable environment. Elevance Health's culture is built and nurtured by every action we choose every day, as one team. Let's hold each other accountable and improve the health of humanity together.

Bryant Aaron, Sr.
Chief Compliance Officer
Elevance Health

Why We Have the Code

The Code is a resource for all of us and is not a comprehensive policy or rulebook. It provides us with guidance on conducting our business ethically, and it helps protect our reputation, members, shareholders, suppliers, and other business partners.

Elevance Health prohibits retaliation against anyone reporting in good faith a known or suspected ethical or compliance concern. Anyone found to have retaliated against someone for making such a report will be subject to corrective action, up to and including termination of employment. By reporting misconduct, you are contributing to Elevance Health's ethical culture and upholding Elevance Health's values.

Unless otherwise noted, the Code applies to associates, officers, and directors of Elevance Health, its affiliates, and subsidiaries, first tier, downstream, or related entities, and our business partners. Certain business units may approve supplements to this Code or adopt their own Code.

If you work with third parties, such as consultants, agents, brokers, suppliers, vendors, independent contractors, or first tier, downstream, or related entities (third parties), you must require these parties to comply with relevant aspects of Elevance Health's compliance policies, provide these parties with information about policy requirements, and take action up to and including terminating a contract, after learning a third party failed to abide by Elevance Health's compliance policies.

The Code does not create any contractual rights between you and Elevance Health. It may be changed or modified by Elevance Health at any time without notice. The Code is not a promise of employment or continued employment.

Elevance Health's Ethics, Compliance, and Privacy Program is led by the Chief Compliance Officer. The Elevance Health Audit Committee of the Board of Directors oversees the program and receives periodic direct reports from the Chief Compliance Officer, as well as from business unit Compliance Officers, as appropriate. The Board of Directors may only grant a waiver of all or part of the Code under exceptional circumstances. Any waivers will be disclosed as required.

Elevance Health's Code is the foundation of our Ethics, Compliance, and Privacy Program. It guides our actions and our decision-making process. By understanding and following the Code, you help safeguard Elevance Health's integrity and reputation as an ethical, caring company.

When assessing whether our actions align with our Code, keep in mind Elevance Health's Guiding Principles:

1. Follow the Code and live Elevance Health's values.
2. Report suspected or observed misconduct.
3. Promote a safe and healthy work environment.
4. Protect confidential and proprietary information.
5. Adhere to policies when using Elevance Health assets.
6. Disclose and manage conflicts of interest.
7. Conduct Elevance Health's business with integrity, fairness, and honesty.
8. Comply with the laws and regulations wherever Elevance Health conducts business.

Our Shared Responsibilities

Knowing and Complying With Our Policies

We are responsible for knowing, understanding, and complying with our policies and applicable laws. By committing to these responsibilities, we will continue to conduct our business with integrity and maintain the trust and high level of service expected from us.

To locate key company-wide policies, select policy hyperlinks embedded throughout the Code, or go to Pulse and enter key words to search for the policy you need. These quick links can also be used to find the company's policies.

Making Ethical Decisions

The Code and our policies cannot replace our own sense of integrity and good judgment. We must do what is right. We are responsible to act with unquestionable ethics in all business matters. We must never commit or ask others to commit unethical or illegal acts. We should immediately report any request or direction to commit an act we think may be illegal or unethical.

Associate Training

Associate trainings are tailored to the relevant needs and roles of associates. All associates are required to complete all trainings assigned to them within the time period provided, including Ethics and Compliance training that covers local, state and federal requirements, for example, relevant information on the False Claims Act, the Stark Law and the Deficit Reduction Act.

Managers must ensure their associates complete their assigned training. It is our policy that any associates who fail to complete required training will face corrective action, up to and including termination of employment.

Enterprise Risk Management

We have a responsibility to understand and follow company policies that address our existing or emerging internal and external risks to our strategic objectives, financials, operations, reputation, legal, and regulatory compliance. We use a Three Lines of Accountability (LoA) approach to risk management. The first LoA roles include our business, functional, process, and risk and control owners, who are each responsible for the day-to-day management of risks, controls, decision making, and risk evaluation. The second LoA roles provide risk oversight of the first LoA including identifying potential risks, providing perspective on issues, and recommending changes to procedures or controls. These functions include, but are not limited to, Enterprise Risk Management, Finance, Information Security, and Compliance. The third LoA is our Internal Audit function, which provides independent audits and reviews of the first and second LoA roles and makes recommendations to enhance our risk management control and governance processes.

Management has an additional responsibility to identify, quantify, mitigate, and properly monitor such risks. Together, managers and associates should work to minimize risks by ensuring effective controls and mitigation strategies are in place.

If you are aware of any such risks not being managed appropriately, discuss it with your manager. You may also contact Internal Audit with risk concerns or reach out to Enterprise Risk Management to discuss a risk issue.

Our Code puts our company's values into action. We have a responsibility to comply with our policies, contracts, and applicable laws where we operate.

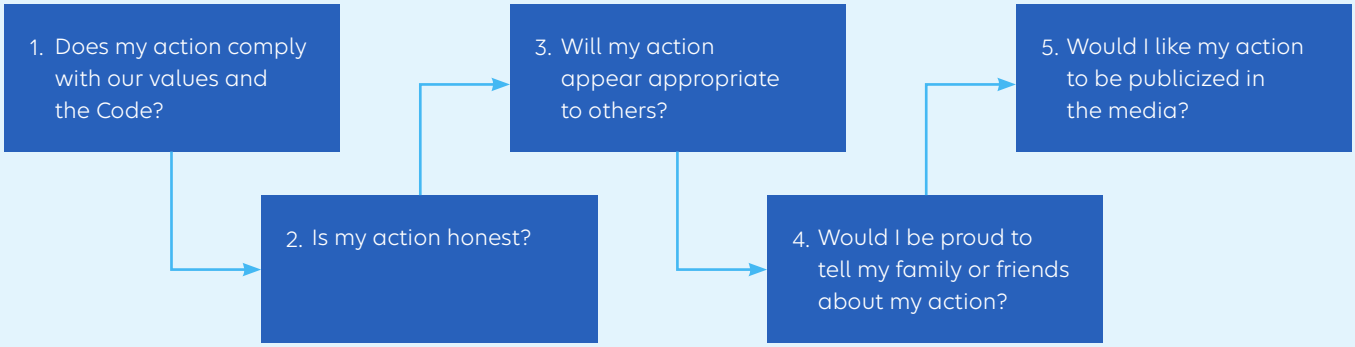
Associates can access key company-wide policies via hyperlinks embedded throughout Code, go to Pulse and enter key words to search for the policy you need, or find quick links here.

Reporting Violations and Seeking Advice

We have a responsibility to speak up and report issues. We must foster a culture where everyone feels comfortable raising issues or concerns in good faith without fear of retaliation.

How do I know if doing something may be unethical or violate the spirit of our Code?

Ask yourself the following questions:



If you answered "no" to any of these questions, seek guidance from your manager before you act. You may also contact Human Resources for advice or reach out to the Ethics Department for support.

Reporting Misconduct and Ethics Concerns

We all have an obligation to report to the Ethics Department any suspected or observed misconduct, including violations of the Code, company policies and procedures, laws and regulations, or any other ethical concerns. Reporting suspected or observed misconduct or other ethical concerns is a condition of our employment. We all are committed to "do the right thing."

The Ethics Department provides us with various channels to submit reports or ask questions. You may first contact your manager for help. If a concern raised with your manager is not resolved or if your manager is involved, the matter may be reported directly to the Ethics Department.

You may submit your report confidentially and anonymously by contacting the Ethics Department as follows:

- Call the Ethics and Compliance HelpLine:
  - From the United States: 877-725-2702
  - From India: 000-8000-4022-65
  - From Ireland: 1-800-300391
  - From the Philippines: 02-8299-3864
  - Worldwide: +1-317-287-5699
  - For FGS associates: 800-438-4427
- Submit an online report about ethics issues at elevancehealthethicshelpline.com
- Send an email reporting ethics concerns to: ethicsandcompliance@elevancehealth.com
- Send a letter to:
  Ethics Department
  VP, Chief Ethics and Privacy Officer
  Elevance Health
  220 Virginia Avenue
  Indianapolis, IN 46204 United States
- Report your concerns directly to the Chief Compliance Officer by telephone or email.
- Additional contact information for FGS associates is available in the FGS Supplemental Code of Conduct.

Living Our Values: Leadership

Managers should ensure suspected or observed misconduct is reported to the Ethics Department.

Reporting Misconduct and Ethics Concerns: Managers' Responsibility

Managers are role models and lead by example. Associates often rely on their manager for guidance in difficult situations. Managers must foster an ethical and compliant culture and encourage their associates to bring concerns to their attention. Managers are expected to:

- Embrace the Code and be an example of an ethical leader.
- Maintain a workplace environment supportive of the Code.
- Maintain an "open door" policy so associates feel comfortable raising concerns.
- Periodically remind associates about our non-retaliation policy.
- Talk openly about ethical behaviors.
- Ensure associates complete required training in a timely manner.
- Ensure associates know the expectation to report concerns and misconduct.
- Enforce the Code and apply consistent corrective action for violations.
- Educate and reinforce with associates the meaning and application of the Code.

The Manager's Guide to Ethical Leadership has additional guidance on being a role model for our associates on how to encourage our associates to conduct Elevance Health business with integrity.

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The first law of leadership is that your foundation is built through integrity, character, and trust.

— **Brian Cagneey,** Leadership: The 7 Laws Of Leadership

Does the Ethics Department Investigate All Concerns Reported?

It is the Ethics Department's policy to review all reports and investigate as appropriate. When a concern is reported that is more appropriately handled by another business unit (for example, Human Resources, Internal Audit, Special Investigations Unit (SIU), Compliance, or Privacy), the concern will be referred to that unit.

What Are Some Examples of Misconduct Resulting in Potential Corrective Action?

Some examples include, but are not limited to:

- Submitting false timesheets or expense reports.
- Inappropriately accessing another associate's or member's confidential information.
- Lying or failing to fully cooperate in an investigation.
- Being complicit and not reporting a known or suspected Code violation.
- Intentionally making false report of a Code violation.
- Engaging in retaliatory behavior when someone has reported a known or suspected Code violation.
- Inappropriate use or disclosure of confidential or proprietary information.
- Not completing required ethics, compliance, information security, and privacy training.
- Providing gifts, entertainment and/or anything of value to local, national, or foreign government officials in violation of Global Anti-Corruption, Anti-Bribery, and U.S. Foreign Corrupt Practices Act (FCPA) policy.

Reporting concerns timely is critical so they may be addressed at the earliest possible stage.

When Is the Ethics and Compliance HelpLine Available?

The HelpLine is available 24 hours a day, seven days a week, 365 days a year. All calls are confidential. Your call is not traced, and no attempt is made to identify those who request anonymity.

In addition to the HelpLine, associates and the public can submit an ethics report online at elevancehealthethicshelpline.com.

If you submit an ethics concern via the online form or HelpLine, you can check the status by going to elevancehealthethicsreportstatus.com, or you may contact the HelpLine directly.

Non-Retaliation and Non-Intimidation

Elevance Health prohibits retaliation against any person who reports in good faith any suspected or observed misconduct, non-compliance or other ethical concerns, and accounting, auditing, or internal accounting control concerns.

Report acts of retaliation to the Ethics Department if there is a violation of this non-intimidation policy.

Q&A

Q. What is a "good faith" report?

A. A good faith report is one where the reporter has a reasonable belief the information provided relates to possible misconduct.

Q. I am an employee of a vendor working on an Elevance Health contract. How can I make a report?

A. You may send your concern through any of the various sources listed above. You may also report concerns to any team member of the Ethics Department or the Chief Compliance Officer directly by telephone or email. In addition, the Ethics Department will accept international calling charges. Translation services will be arranged as necessary.

This Code is published under the Corporate Governance section of our website: elevancehealth.com. The Elevance Health Supplier Code of Conduct is also public and contains the Ethics Department contact methods.

Investigating Reported Violations, Confidentiality, and Duty to Cooperate

The Ethics Department reviews all reports received and fully investigates, as appropriate, all ethics and compliance concerns. Where applicable, Ethics refers certain reports to the appropriate business area, such as Associate Relations or Special Investigations Unit. Appropriate corrective action will be taken to address and correct findings made from investigations of reported concerns. Ethics treats all reports confidentially. The information provided will be shared only on a "need-to-know" basis with those responsible for resolving a concern.

We all have a duty to fully cooperate with an Ethics and Compliance investigation. We must provide all known information and must not withhold, destroy, or tamper with any records or other potential evidence related to the matter under investigation.

Corrective Action

If we approve or participate in actions violating the Code, company policies and procedures, laws or regulations or fail to fully cooperate in an investigation, we are subject to corrective action. Corrective action may include termination of employment in the case of an associate, or termination of assignment or relationship with Elevance Health for those in other roles.

Reporting Accounting, Auditing, and Internal Accounting Control Concerns

Concerns regarding accounting, auditing, and internal accounting controls deserve special mention because they could affect our financial reporting obligations. We must report concerns about accounting, auditing, and internal accounting control deficiencies or non-compliance to the Ethics Department using one of the channels previously identified. Some examples include, but are not limited to:

- False statements or deliberate errors in the recording and maintaining of Elevance Health financial records and those of its subsidiaries.
- False statements or deliberate errors in the preparation, evaluation, review, or audit of any Elevance Health, and its subsidiaries
- Financial statements, and deficiencies in or non-compliance with Elevance Health's internal accounting controls or policies.

Violation of this Code may result in corrective action, including termination of employment or contract.

Reporting Possible Provider or Member Fraud, Waste, and Abuse

Elevance Health recognizes the importance of preventing, detecting, and investigating fraud, waste, and abuse, and is committed to protecting and preserving the integrity and availability of healthcare resources.

Fraud comes in a number of forms. There are several departments within the company assigned to address different types of potential fraud. As an associate, you should know how to report your suspicions to the appropriate department.

To report an allegation of member or provider fraud, waste, or abuse, contact the Special Investigations Unit directly by calling the applicable state SIU hotline numbers or by using the correct fraud form on the company intranet.

To report anonymously you can use one of the hotline numbers or the external form found on our consumer fraud education site, fighthealthcarefraud.com, and select "Report it." Supply as much information as possible. Contact information is not required, but without contact information, the SIU cannot get in touch with you if additional information is needed. National Government Services (NGS) associates should submit referrals by using the Screening Investigation Referral form.

Disclosure

We are committed to making appropriate disclosures to regulators, business partners, government agencies, and law enforcement authorities.

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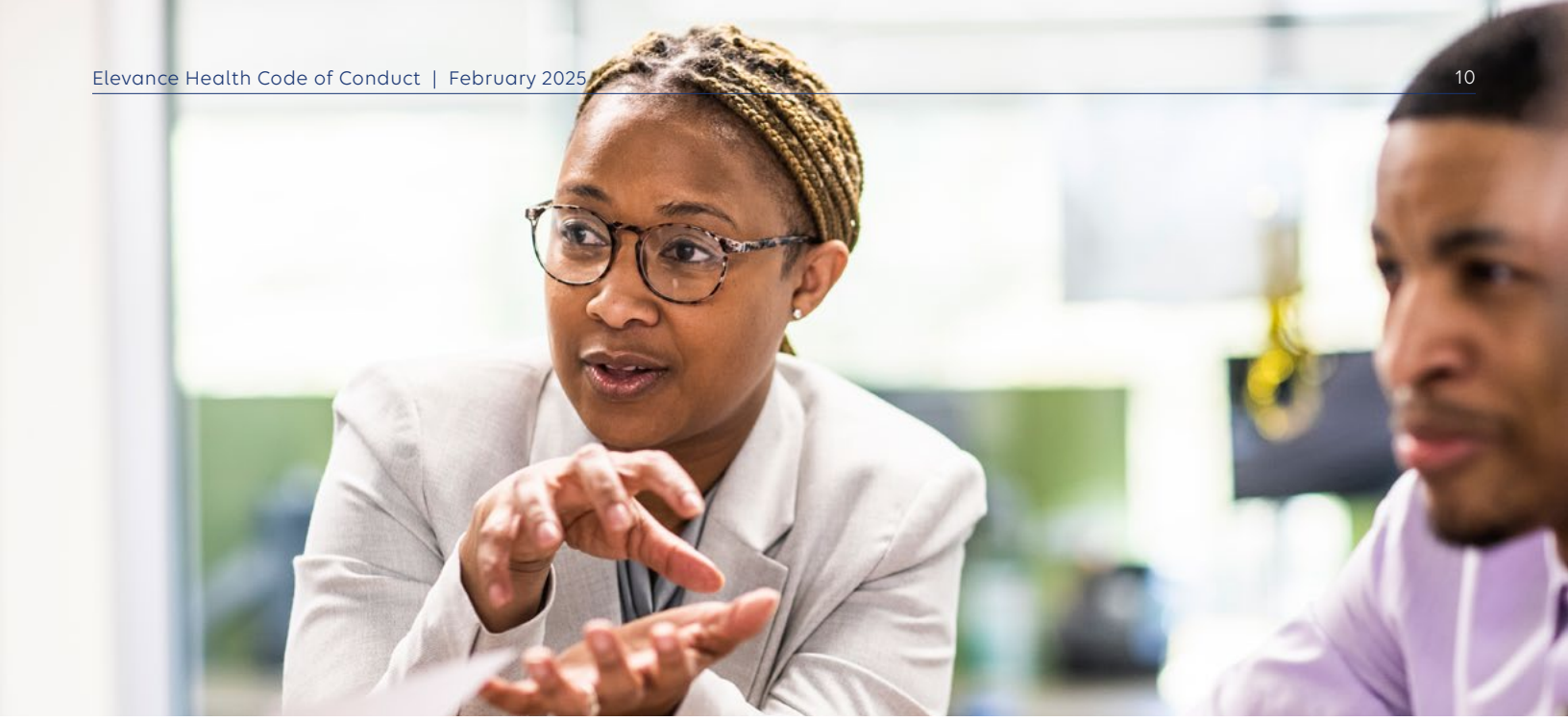
Knowing what's right doesn't mean much unless you do what's right.

— Franklin Roosevelt



Our Work Environment

We are committed to a safe and healthy work environment. Creating an atmosphere of honesty and respect enhances our relationships with our coworkers, members, and business partners.

Go to the Human Resources site to learn more about the policies in this section.

Alcohol and Drug-Free Workplace

Associates must report to work free from the influence of illegal drugs and alcohol. Possessing, selling, manufacturing, or distributing illegal drugs on company property at any location is prohibited. The only exception is if senior management has specifically approved the possession and serving of alcoholic beverages for special events.

In addition, keeping illegal substances in our vehicles while on company-owned or leased property is prohibited. Searches of personal and company property located on company-owned or leased property may occur at any time. A violation of the company's policy on alcohol and drug-free workplace may result in corrective action, including termination of employment.

Drug/Alcohol Testing

If your manager has reasonable suspicion you are under the influence of drugs and/or alcohol while working, or if required based on your position, you may be required to submit to alcohol and/or drug testing. In addition, possession of paraphernalia is reasonable suspicion to support testing. Refusing to submit to testing may result in corrective action, including termination of employment.

The Drug-Free Workplace law requires anyone working on a government contract to notify his or her manager within five days of any drug-related criminal conviction.

Elevance Health has Associate CARE Service for associates who are seeking drug counseling, rehabilitation, and other employee assistance programs.

Workplace Violence

If you experience or have knowledge of any threatening behavior, you should immediately report it to your manager or Human Resources. Our work environment is expected to be free from acts of violence, threats, harassment, intimidation, or other disruptive behavior.

This workplace violence policy applies while we are conducting company business, regardless of location. All threats (even in jest) are serious and may result in corrective action, including termination of employment.

Weapons

Weapons are prohibited on company-owned or leased property (subject to individual state laws) and while conducting company business.

Background Checks

We believe hiring the best-qualified applicants contributes to our success. Background checks are conducted on all associates, temporary, and contract/contingent workers.

Employment of Government Personnel

Federal government personnel hiring is governed by federal law. Contact the Legal Department before discussing employment or consulting arrangements with current or former federal government employees, including elected officials.

When considering hiring former state government employees, including elected officials, the hiring manager is responsible to ensure no conflicts of interest exist with their Elevance Health duties and the individual's previous state employment. Contact the Legal Department with questions.

Equal Employment Opportunity

We are committed to providing equal opportunity in employment to all associates and applicants. Nobody may be discriminated against in employment because of race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by applicable federal, state, or local laws, except where a bona fide occupational qualification applies.

Solicitation and Distribution of Materials

We may not solicit other associates or distribute non-work-related literature or materials during work time and in work areas. Solicitation or distribution for any purpose by non-associates is not allowed on company property unless approved by senior management. This includes the distribution or posting of literature, pamphlets, chain letters, personal business cards, or any other written or printed material of any kind, including email. In addition, the use of office supplies for non-company sponsored solicitation activities is prohibited. There are limited exceptions to the solicitation and distribution policy. Contact Associate Relations (AR) with questions about solicitation.

Discrimination and Harassment

We are committed to a work environment free from prohibited discrimination and harassment. We forbid discriminatory harassment with respect to race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by applicable international, federal, state and/or local laws. In addition, we are prohibited from retaliating against others for reporting what they believe to be a violation of this harassment free work environment policy.

Sexual Harassment

Sexual harassment is prohibited. It may take many forms, including unwelcome sexual advances, requests, or demands for sexual favors and other visual, verbal, or physical conduct of a sexual or gender-based nature when:

- Submission to or rejection of such conduct is used as a basis for employment decisions such as, but not limited to promotions, transfers, appraisal ratings, corrective action, training opportunities, salary treatment, or job assignments.
- Submission to such conduct is made either explicitly or implicitly as a term or condition of employment.
- Such conduct has the purpose or effect of unreasonably interfering with an associate's work performance or creating an intimidating, hostile, or offensive work environment.

Workplace Health and Safety

Elevance Health is committed to providing a safe and healthy working environment for our associates. We have a comprehensive Associate Safety Program designed to prevent injury and illness in the workplace and satisfy applicable state and federal occupational safety and health requirements. The Associate Safety Program includes tools and resources to foster a safe and healthy work environment and to ensure all associates can perform their work in such a manner as to not jeopardize the health and safety of themselves or follow associates. All associates are expected to become familiar with and abide by company occupational health and safety policies and procedures.

Living Our Values: Diversity

Elevance Health has an open door policy. This means we should feel free to voice any concerns to managers at any time. We are encouraged to report any incident of alleged discrimination, discriminatory harassment, or sexual harassment to our manager or any member of the management team. Associate Relations (AR) can also be contacted with discrimination and harassment issues.

Protecting Our Information

We have many types of information vital to conducting our business. This includes material and nonpublic information, as well as other confidential and proprietary information about our:

- Strategies, products, processes, services, and financials.
- Members, providers, associates, vendors, agents, business partners, and government contracts.

We must never use or disclose our confidential or proprietary information unless authorized by company policy in connection with a legitimate business need. We may not use or disclose a third party's confidential or proprietary information learned in the course of doing business with them without proper authorization and approvals.

Much of the data/information derived from our government contracts are also subject to restrictions. For example, any/all information about Federal Employee Health Benefit Program (FEHBP) members and Medicare fee-for-service beneficiaries, regardless of whether such information is aggregated or de-identified, may only be used in the performance of those federal contracts.

Confidential and Proprietary Information About Our Business

Elevance Health's confidential and proprietary information includes any information not shared with individuals outside of the company and any information useful to our competitors.

It is everyone's responsibility to help ensure our confidential and proprietary information is used only when authorized by policy and for valid business purposes. We are obligated to protect this information from improper use or disclosure even after our employment ends.

Work product developed as an Elevance Health associate remains Elevance Health property. We may not take customer/member lists, formulas, processes, contracts, trade secrets, intellectual property, sales-related information, or any other company confidential or proprietary information with us when our employment with Elevance Health ends.

Living Our Values: Agility

In order to achieve the best business results, we cannot let our agility compromise our value of integrity.

Confidential Information About Our Members

Federal, state, and local laws, as well as contractual obligations, govern our use and disclosure of our members' and beneficiaries' protected health information (PHI), protected financial information (PFI), personal information (PI) and other private information.

Never access, share, or use any member or beneficiary confidential information, unless authorized to do so and then only for a valid business purpose and required by our assigned job. We must maintain the trust of our members, customers, and beneficiaries and keep their information confidential. Elevance Health is committed to responsible, ethical data practices.

In addition, never access claims, confidential information, health coverage, or other Elevance Health services information about ourselves, family members, or those with whom we have a personal relationship, including, but not limited to, significant others, roommates, friends, in-laws, acquaintances, or neighbors. You must utilize the appropriate Customer Service channels to address any matters.

Confidential Information About Our Associates

Never access or provide confidential associate information unless it is authorized by policy, for a valid business purpose, and required by our assigned job duties. Nothing in this section or the company's policies intends to or will be applied in a manner to limit associates' rights to discuss and share their personal wage/salary data, claims and medical information, employment agreement, Social Security number, financial and banking information, and other personnel information with each other and with outside entities as protected by the National Labor Relations Act and other relevant laws.

Material Nonpublic Information About Our Company

Laws and company policies do not allow us to use or disclose material nonpublic information for our personal financial benefit or the financial benefit of family, friends, or others.

We must not buy or sell Elevance Health securities or another publicly traded company's securities if we have material nonpublic information. In addition, we must not share or disclose material nonpublic information with coworkers, family, friends, or others.

Before trading in Elevance Health securities, company directors, officers, and all associates should consult and comply with our public company policies, including our Insider Trading Policy.

Q&A

Q. I work in Sales and my job duties allow me to access claims data. My sister wants copies of all her Explanation of Benefits (EOBs) for the current year. She asked me to obtain copies for her. Can I do this?

A. No. Although your sister has given you permission, you are not authorized as part of your job responsibilities. Your sister must contact Customer Service.

Q. I worked long hours for Elevance Health developing my customer contacts. I recently accepted a similar position with a competitor. Can I keep the client lists I worked so hard to develop?

A. No. Elevance Health customer/member lists and other proprietary information developed while at Elevance Health are owned by Elevance Health. You must return all Elevance Health documents and equipment upon departure. Elevance Health has the right to contact your new employer if we have reason to believe you have taken proprietary information. This could impact your relationship with your new employer.

Q. What is material information?

A. Information is generally considered material if a reasonable investor would consider it important in deciding to buy, sell or hold Elevance Health stock.

Q. When is information public?

A. Information is public if it has been disclosed broadly to the marketplace (such as by a press release or an SEC filing) and the investing public has had time to absorb the information fully. Refer to the Insider Trading Policy for more details.

Confidential Information About Our Care Providers, Vendors, and Business Partners

Never access or share confidential information about our care providers, vendors, and other business partners unless it is authorized by our information security policies, for a valid business purpose, and required by our assigned job duties.

Requests for Confidential Information Related to Government Contracts

Much of the information created under government contracts belongs to the government entity for which the work is being performed. We must comply with all applicable laws regarding the use and disclosure of this information, including the Freedom of Information Act, HIPAA, the Privacy Act of 1974, and state law equivalents regarding the use and disclosure of this information, as well as contract provisions relating to use use and disclosure.

Third-Party Confidential and Proprietary Information

Elevance Health prohibits the use or disclosure of a prior employer's (whether or not it's a competitor) or a third party's confidential or proprietary information in connection with your Elevance Health work. Sharing such information can violate laws or contract requirements, damage our integrity, and expose us to liability. Improper use of this type of information may result in corrective action, including termination of employment and legal action.

If we receive any unauthorized nonpublic, confidential, or proprietary information about any third party, we must immediately:

- Stop reviewing the document(s), and
- Immediately contact the Ethics Department. Be prepared to describe the specifics of receipt (time, date, means of receipt, people involved, and extent of review/use).

Do not use, forward, copy, delete, or destroy the information unless instructed to do so by the Legal Department.

Documenting and Reporting Information

Accurate, complete, and truthful financial, operational, and other business records are vital to our decision-making processes. They directly impact our compliance with financial, legal, and regulatory reporting requirements.

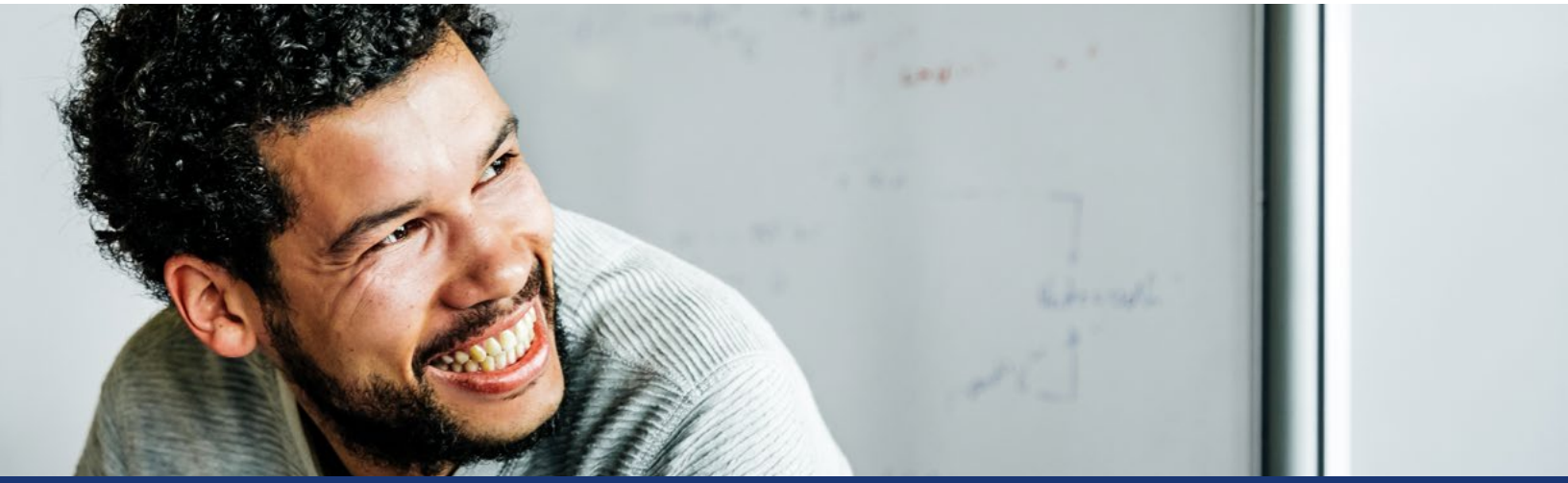
Inaccurate, incomplete, or false financial or operational information provided in connection with certifications of government contracts and other entities is strictly prohibited.

In addition, undisclosed or undocumented (unrecorded) accounts, funds, or assets are not allowed. Company funds should never be placed in any personal or noncorporate account.

Public Speaking and Media Relations

To provide accurate and complete, and consistent information about Elevance Health's business to the media, investment community, and external audience, all news media and thought leadership opportunities will be responded to in a timely and professional manner only by Corporate Communications teams, per public speaking policies and processes. Associates should contact Corporate Communications for any media outreach received as well as to seek approval prior to accepting any speaking opportunity.

> **Your ethical muscle grows stronger every time you choose right over wrong.**
>
> **— Price Pritchett**



Use of Company Assets

We should only use company funds, equipment, and other assets to conduct business, or for other reasons as long as they are approved by a manager. Company assets, such as telephone and email, are to be used in a professional, productive, ethical, and lawful manner. We should not use, sell, or dispose of company assets unless allowed by policy.

Associates should expect that our electronic messaging and other electronic communication systems used during our employment or assignment with Elevance Health may be accessed or monitored for business reasons. Our communications may be reviewed as part of a legal matter, internal investigations, or other business-related matters when deemed necessary by Elevance Health.

Electronic Assets

We use a variety of equipment and communication tools such as email, instant messaging, and telephones to conduct our business. We must follow policies relating to these assets. We may use some equipment and communication tools for personal use, in a limited manner, as long as a manager approves and any personal use:

- Does not affect productivity.
- Does not result in a direct material cost to the company.
- Follows applicable information security policies, follows asset management policies, and the law.

Elevance Health has the right to review, record, copy, audit, investigate, intercept, access, and disclose any use of the company's information technology including computers, internet, intranet, emails, instant messages, voicemail, and telephone systems including all messages created, received, or sent for any purpose. The contents of electronic storage (including but not limited to email) may be disclosed within the company and outside the company (including law enforcement or government agencies) to those who have a need to know, without your knowledge or permission.

We do not have an expectation of privacy in electronic messaging and other electronic communication systems used during our employment or assignment with Elevance Health. Our communications may be reviewed as part of a legal matter, internal investigations, or whenever deemed necessary by Elevance Health.

Q&A

Q. What are some examples of company assets?

- Cash, checks, and company credit cards
- Buildings and fixtures
- Office supplies
- Computer hardware and software
- Documents, information/data, and records
- Fax machines and copiers
- Telephones and voicemail systems
- Email, intranet, and internet access

Q. Company assets may not be used for:

- Illegal activity
- Personal gain
- Solicitation of personal business
- Personal political activity
- Sale of any services or products other than Elevance Health's
- Public advancement of individual views
- Harassment of any type
- Creating, viewing, receiving, sending, or downloading chain email (including jokes)
- Sexually explicit material
- Inflammatory or derogatory communications

Company assets must be returned immediately upon departure (termination of employment).

Mobile Devices

- Company-issued cell phones and mobile devices are offered only when mobility/accessibility is important for your job at your manager's discretion. Utilization of non-sanctioned communications applications on Company-issued phones or mobile devices is prohibited and shall not be used for substantive business communications. Never use text messaging to send PHI.
- Substantive Company business communications on personal mobile devices is prohibited, except in the limited circumstances where there is a department policy permitting such use. Personal mobile devices are not to be used to communicate or store PHI, PII or Company Confidential information. Elevance Health has the right to physically access any personal device used for company business to inspect, review and collect company information and to release such information to government agencies or third parties during an investigation or in litigation in the Company's sole discretion. Associates are obligated to cooperate with Elevance Health or its designee in providing physical access to any device used for company business when Elevance Health deems necessary. Associates are obligated to provide the pin number/access code of the device to Elevance Health or its designee when needed or requested.
- Associates who receive a legal hold notice must preserve and take steps to prevent any auto-deletion of, business communications on any company-issued or personal cell phone or mobile device that may be covered by the legal hold. When in doubt, preserve the information and contact the Legal Department to determine the scope of the legal hold.

Associate Use of Artificial Intelligence, Machine Learning, and Large Language Models

All Artificial Intelligence, machine learning, and large language models must be developed and/or used consistent with the Enterprise Artificial Intelligence (AI) policy, integrating a value-driven approach throughout the lifecycle, functioning as intended and consistent with Elevance Health's Code of Conduct. At a minimum, Associates must:

- assess AI for potential, bias, and inclusion, remediating to reduce and/or eliminate harmful bias,
- maintain explainable, transparent documentation such as AI use cases, outcomes, and performance metrics,
- execute robust testing, to ensure quality of performance, and accuracy, and
- monitor performance, commensurate with risk, to ensure AI continues to operate as originally intended, and within the baseline parameters bias and performance metrics, remediating as necessary to bring alignment with intended purpose.

Our AI solutions are governed by policies and procedures designed to ensure compliance with regulations governing privacy and data use in our industry and our Responsible AI Program, which is designed to mitigate harmful bias and promote accuracy, security and transparency.

Passwords and Access Codes

Never share passwords or access codes with anyone, per Password FAQs.

Software

In accordance with the IT Asset Management policy, we may not copy or use illegal or unauthorized software on Elevance Health's electronic assets or computer networks. NGS associates can locate the asset management policy here.

Social Networking

If we participate in electronic communication such as social network sites, blogs, chat rooms, Facebook, Twitter, Instagram, and similar forms of communication, we must not disclose Elevance Health's confidential information. We are expected to consider company policies and the ramifications of all of our communications, both internally and externally. We must also make it clear the views we express are ours alone and not Elevance Health's views. The content of our messages may not be discriminatory or harassing towards any person or entity, including other associates, managers, members, competitors, or any business partners of the company.

Record Retention and Destruction

We are committed to complying with the recordkeeping requirements of applicable laws and contract requirements. Destroying or disposing of company records is not at our individual discretion. The Elevance Health Records Management program governs record retention and the appropriate disposition of records once the applicable retention period has expired. In addition, records relevant to actual or anticipated litigation or government investigations, may not be altered or destroyed and must be preserved.

Destruction or alteration of records to avoid disclosure in a legal proceeding, government investigation, or audit is strictly prohibited and may constitute a criminal offense.

Before destroying records, we are required to check the records retention schedule to determine if the applicable retention period has expired. We must also check with our manager or the Legal Department to determine if the records are the subject of a Legal Hold Notice. If so, the records must be preserved and may not be altered or destroyed without approval from the Legal Department, even if the regular retention period has expired. NGS associates should follow the NGS Record Control Procedure.

> **Real integrity is doing the right thing, knowing that nobody's going to know whether you did it or not.**
>
> **— Oprah Winfrey**

Q&A

Q. I want to livestream from my workspace so my friends and family can see what I do on my job. Is that okay?

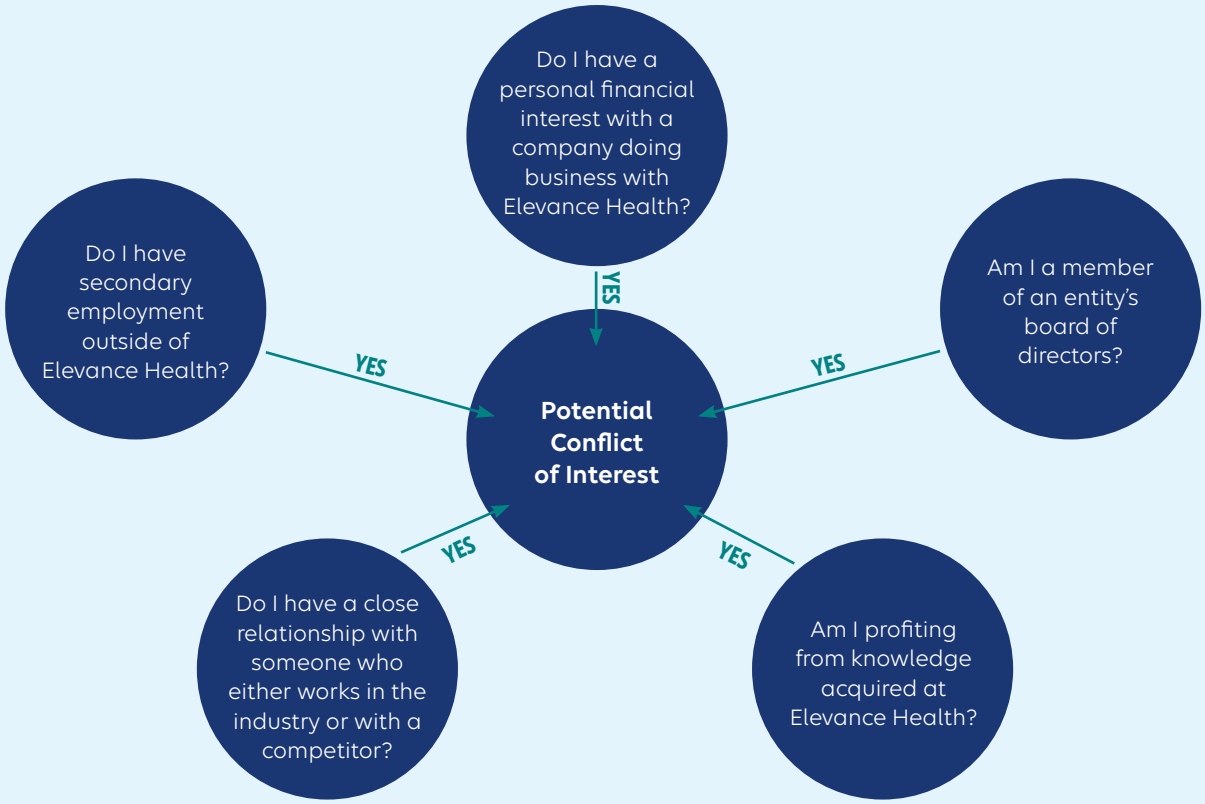
A. No. Photos, videos, and recordings are not permitted in work areas. Protected health information or other confidential data may appear in the photo or be overheard that could lead to a non-permitted disclosure of protected health information. Posting such images or information to social media could lead to sanctions or corrective action, including termination, or state or federal enforcement action against you by regulators.

On Our Own Time

We are required to perform our responsibilities in a manner that furthers Elevance Health's interests. We must not compromise those interests due to actual or perceived conflicts with other business or personal concerns. A conflict of interest arises when our personal interests or activities appear to influence, or may influence, our ability to act in the best interests of Elevance Health.

How do I know if I have a conflict of interest?

Ask yourself the following questions:



If you answer "yes" to any of these questions, seek guidance from the Ethics Department.

Conflict of Interest: Disclosure

New and rehired associates must complete a Conflict of Interest survey within 30 days of receiving the assigned survey. Any leader with direct reports, officers, and associates on subsidiary boards or boards of directors for joint ventures and alliances must complete a Conflict of Interest survey on an annual basis. In addition, when our job responsibilities, outside activities or personal relationships change, we are required to disclose any potential conflicts of interest immediately. To help avoid a potential conflict of interest in the following situations, we should discuss with our manager and contact the Ethics Department to update our conflict of interest form.

Personal Financial Interest

We may not own, directly or indirectly, a significant financial interest in a company that does business with, seeks to do business with, or competes with Elevance Health.

We must not refer customers, members, beneficiaries, or anyone who does business with the company to an entity in which we or a family member has a financial or other material interest.

Some unique situations may qualify as an exception to this policy and will be addressed on an individual basis. Exceptions to this policy may require the written approval of the Chief Compliance Officer.

Family and Personal Relationships

Employment of relatives and individuals involved in personal relationships with associates is allowed as long as those individuals are the best-qualified candidates for the job, and it is not a prohibited relationship.

Outside Employment and Other Activities

Our primary employment obligation is to Elevance Health. Activities such as working a second job, serving as a member of an external board, or operating a personal business must not conflict with our obligations to Elevance Health. More importantly, associates who work for a secondary employer during their assigned Elevance Health work hours are violating the conflict of interest policy by taking their focus away from their primary job and stealing compensation from the company by accepting compensation while working on non-company matters. In most cases, a mitigation plan can be developed to help prevent any actual or perceived conflicts. In addition, we may not use the company's name, time, assets, or the services of other associates for any outside activities unless authorized by company policy.

If you wish to serve on an entity's board of directors, you must notify the Ethics Department prior to accepting the board position, as this may require preapproval from the Chief Executive Officer.

Q&A

Q. What should I remember when I conduct external activities on my personal time?

- Secondary employment, whether full-time, part-time, or freelance, must be disclosed to the Ethics Department. It's the activity that is the focus, not the method or frequency of any income.
- Even certain volunteer opportunities may conflict with your Elevance Health employment. When in doubt, disclose it to the Ethics Department.
- Public speaking opportunities, as well as any contributions to external publications, should also be preapproved by the Elevance Health Corporate Communication team by contacting publicspeaking@elevancehealth.com.

Living Our Values: Integrity

We must avoid even a perception that our outside activities conflict with our ability to do our job.

Personal Political Activity and Contributions

We support associate involvement in local, state, and federal political activities in their personal lives. However, when engaging in such personal political activities, we must make clear that the views we express are our own and not those of Elevance Health or our affiliated companies. When engaging in personal political activity, we may not use our Elevance Health titles on name badges, wear Elevance Health-branded clothing, or carry any other Elevance Health-branded items (such as water bottles). Doing so could mistakenly convey Elevance Health support for a particular political party, candidate, or issue. This applies to branded items of our affiliated companies (including Wellpoint and Carelon) as well.

We may use our own personal funds to make direct political contributions to any candidate, office holder, or political organization, where permitted by law (there may be rules that bar certain individuals employed by companies with state contracts for making personal political contributions in that state). We may not solicit contributions from other associates for personal political purposes on company time or ask other Elevance Health associates to perform activities to support personal political activities. Doing so would be considered an in-kind political contribution and failure to report such a contribution could result in criminal penalties against Elevance Health and associates.

Additionally, federal and state laws restrict the use of corporate resources, such as computers, email, phones, stationery, copiers, and other company assets in carrying out personal political activities. Unless authorized in accordance with established corporate policy, we should only use personal property, facilities, and time for personal political activity. We must get the approval of Elevance Health's Senior Vice President of Public Affairs and comply with all applicable laws before using company resources for political activities.

Eligible associates, as defined by federal and state law, can make financial contributions to the company's nonpartisan Political Action Committee ("Elevance Health PAC") to support Elevance Health's engagement in the political process. Elevance Health PAC makes contributions to federal, state, and local candidates, political parties, and political committees, based on their positions, and/or ability to influence, public policies that align with the company's core business objectives and growth strategy. Because we are not likely to agree with every viewpoint of a candidate, party or committee to which Elevance Health PAC contributes, we use Board-approved criteria to guide our decision making.

We are also encouraged, but never required, to attend candidate forums, appearances by public officials, and other programs sponsored by Elevance Health.

Check with Elevance Health's Public Affairs Department before engaging in personal political activity if you have questions.

Q&A

Q. What should I remember when I participate in personal, volunteer political fundraising or other political activities?

- Only conduct the activity on my personal time.
- Only solicit and/or collect political contributions on personal property.
- Only use my personal stationery and postage, or the campaign's stationery or postage.
- Only type letters and political communications from home, using personal equipment and supplies.
- Only use a home office, a personal email address, a telephone number, or a post office box not associated with Elevance Health, when returning an RSVP to a campaign.

Conducting Elevance Health's Business

Fairness

We deal fairly and honestly in all business dealings.

Community Service

The Elevance Health Foundation is a private, non-profit organization funded by Elevance Health. Through national and local grants, we work to improve community health through strategic partnerships and programs in our communities.

In addition to providing health-related grants, the Foundation also runs an Impact Investing Program and Associate Engagement Program through which it matches the funds Elevance Health associates donate through our Dollars for Dollars Program and encourages associate community engagement through our portfolio of volunteer programs. Elevance Health Foundation must ensure its funding benefits charitable programs as required by IRS rules governing private foundations.

Through Elevance Health CARES, our public charity, we support disaster relief efforts and Elevance Health associates, their families, and communities in times of need.

Environment

We are encouraged to act as stewards of the environment and act in an environmentally conscious manner. We should minimize, reuse, and recycle waste at our facilities, in accordance with local waste regulations. We should reduce paper use from printing and conserve energy by turning off computer monitors, equipment, and lighting after business hours. Please review our Environmental Policy and Commitments for additional information.

Firewall: Proactive Approach to Competitively Sensitive Information

Many of our entities do business with other Elevance Health subsidiaries, as well as with external Customers that may compete with Elevance Health businesses. This means that even though these entities might be wholly owned by Elevance Health, there are additional protections needed regarding access, use and disclosure of sensitive information to ensure compliance with antitrust laws. Competitively Sensitive Information (CSI) Firewalls are designed to ensure that sensitive information required to conduct business is used and disclosed properly between the Elevance Health family of companies.

According to our Enterprise Firewall Policy, CSI refers to any non-public information that could be used to obtain a commercial advantage over a competitor, Customer or supplier. Associates working for Elevance Health should refer to the Enterprise Firewall Policy for guidance, as well as contact csifirewall@elevancehealth.com for questions. Associates working for Carelon and CarelonRx should refer to the Carelon Firewall Policy and CarelonRx Firewall Policy Addendum for guidance, as well as contact FirewallQs@carelon.com for questions.

We obtain business on the merits of our products, services, and people. We strive to do business with organizations that also have high standards of business ethics and integrity. No matter what organization we deal with, or its relationship to Elevance Health, we observe those standards.

Living Our Values: Community

Corporate responsibility is intrinsic to fulfilling our vision to be the most innovative, valuable, and inclusive partner.

Gifts and Special Courtesies

We should use good judgment and discretion to avoid even the appearance of impropriety or obligation in giving or receiving gifts and entertainment. Please refer to the Gifts and Special Courtesies Policy before accepting or offering any gift. In general, for both accepting and offering gifts, this includes:

- We must ensure any gift given or received, or entertainment hosted or attended does not violate the law, customary business practices, or the Code.
- We should not accept or offer any single gift valued above $100 per occasion (or an equivalent amount in local currency).
- We must ensure the total value of any combination of gifts to or from a single entity never exceeds $200 in a calendar year (or an equivalent in local currency).
- We should be aware of any additional restrictions in our business unit and follow them. For example, associates in Procurement or certain government business units may not be allowed to accept any gifts.
- We must follow the Gifts and Special Courtesies Policy even if our local customs or culture do not make this convenient.
- We should consult our manager or Ethics with questions we have before accepting or offering the gift.

Per the Global Anti-Corruption, Anti-Bribery, and U.S. Foreign Corrupt Practices Act (FCPA) Policy and Gifts and Special Courtesies Policy, we prohibit the offering or receipt of gifts to any local, national, or foreign government officials.

Any exception must be preapproved by Elevance Health's Chief Compliance Officer, Senior Vice President of Public Affairs, and the applicable Vice President of the business unit conducting the activity.

Remember that we may not offer, solicit an offer, provider, or receive kickbacks of any kind. Go to the "Kickbacks" section of this Code of Conduct for additional explanation and resources.

Individual business units monitor gift policy compliance by tracking their gifts offered to external sources. There are special rules for gifts to government employees as outlined in the Lobbying/Contacting Federal, State, and Local Elected Officials, Regulators, or Government Agencies sections of this Code.

Gifts purchased and expensed to the company that violate the Gifts and Special Courtesies Policy dollar limits may be denied expense reimbursement, and corrective action may be taken up to and including termination of employment.

Gifts Cards: Accepting or Offering

We may accept gift cards from external sources if the gift cards may not be redeemed for cash and do not violate our Gifts and Special Courtesies Policy limits.

Gifts cards can present perceptions of certain tax, kickback and fairness risks. Any offering or gift cards to members or providers MUST be fully vetted by Legal and Compliance AND comply with the Gifts Cards & Gift Certificates Policy.

Q&A

Q. A company vendor gave me a $25 gift card to my favorite restaurant as a thank you for helping them meet a project deadline. Can I accept the gift card?

A. Yes, you may accept the gift card in most of these types of circumstances.

Q. A vendor sent me a gift basket of cookies valued at $150 to thank me for helping on a project. Can I keep it?

A. Yes, if your manager approves, you do not work in Procurement or a business unit servicing a government contract, and you share the cookies with the department. This would be the same for any perishable gift such as flowers or fruit.

Q. My team would like to give a $50 gift card to a provider's office manager for helping us identify a claim error. Are we allowed to give her a gift card?

A. No. Go to the policy on Gift Cards & Gift Certificates for further guidance.

Q. A group of members in our resource group took up a collection for my 25th wedding anniversary. I feel awkward returning the $125 in cash, but it is above the gift limit.

A. You should not accept a gift that exceeds our gift tolerances, and all cash gifts must be declined. Gifts outside of our policies need to be returned.

Q. I am an expert in my field and have been offered the opportunity to speak at a conference sponsored by one of our major vendors. Budgets are tight, so the vendor offered to pay for my flight and hotel.

A. We may accept a conference fee waiver when all speakers in the same category receive the same courtesy, but we may not accept for Travel and Lodging from the vendor.

Business Entertainment

Our relationship with vendors, customers, and prospective customers may include business entertainment functions. Business matters are discussed as part of business entertainment even where it is apparent the event is not intended solely as a business meeting. When we provide or accept business entertainment, both an Elevance Health associate and the vendor, customer, or prospective customer must be present at the event. Business entertainment includes, but is not limited to:

- Meals
- Charitable and sporting events
- Golf, spas, and parties
- Plays and concerts
- Industry conferences
- Other events where business matters are discussed

We must display socially appropriate behavior during business entertainment events.

When any business entertainment involves local, national, or foreign government officials, we must ensure it does not violate Elevance Health's Gifts and Special Courtesies Policy, Global Anti-Corruption, Anti-Bribery and U.S. Foreign Corrupt Practices Act (FCPA) Policy. We must also comply with international laws such as the Ireland Criminal Justice (Corruption Offences) Act 2018, U.K. Bribery Act of 2010, and similar laws in other countries that prohibit bribery and corruption and where Elevance Health affiliates/subsidiaries operate. Before participating in business entertainment, consult with your manager and review Elevance Health's Gifts and Special Courtesies Policy, Global Anticorruption, Anti-Bribery and U.S. Foreign Corrupt Practices Act (FCPA) Policy, and Travel and Expense policies. Contact a member of Ethics, Compliance and Privacy Department if you need additional information and guidance.

Elevance Health's Travel & Expense Reimbursement policy requires management preapproval for business entertainment over $200 per person/event. Any business entertainment over $1,000 must be preapproved in writing by a member of the Senior Leadership team.

Discounts

Elevance Health may provide discounts if they are:

- Of nominal value.
- Reasonable, based upon the circumstances.
- Only offered to existing members for health-related products or based on health-related activities, and the discount is not generally available to the public.

Check with the Legal Department to determine current requirements before offering a discount.

Anti-Rebating Statutes: Offering Gifts to Customers and Potential Customers

Anti-rebating laws prohibit a person representing Elevance Health from offering our customers or prospective customers the following in an attempt to solicit or induce the purchase of our products or services:

- Employment
- Shares of stock or other securities
- Any advisory board contract, or any similar contract, agreement, or understanding, offer providing for or promising any profits or special returns or special dividends
- Any prizes, goods, merchandise, or property of an aggregate value in excess of individual state guidelines or local law

Check with the Legal Department to determine individual states' current requirements.

Lobbying/Contacting Federal, State, and Local Elected Officials, Regulators, or Government Agencies

Elevance Health and Elevance Health associates engage with elected and non-elected officials and others at all levels of government in the United States, U.S. territories, and other countries, to advocate our position on public policy issues through a variety of activities and communications. We must comply with all disclosure requirements as prescribed by law with respect to engagement with the government.

There are strictly enforced laws and regulations regarding contacts with domestic and foreign government officials. In addition, our business contracts with domestic and foreign government agencies may include restrictions on lobbying or other contacts with government officials domestic or foreign (including contacts related to sales and business development). Additionally, personal political activity can be perceived as a conflict and should be pre-approved by Elevance Health's Public Affairs Department, if you work on any government contract.

Associates in Elevance Health's Public Affairs Department (and other associates preauthorized by Public Affairs, and external lobbyists and consultants engaged by the Public Affairs Department) are the only individuals that may take part in lobbying on behalf of the company. If there is a business need to meet with any domestic of foreign government official or engage an external lobbyist/consultant, it must be conducted in conjunction with the Public Affairs Department with preapproval from the Senior Vice President of Public Affairs.

From time to time, the Public Affairs Department may ask associates for "grassroots" support on public policy issues of interest to Elevance Health. Our participation is encouraged but is never required. Any grassroots lobbying activities conducted on behalf of Elevance Health must have prior approval of the Senior Vice President of Public Affairs.

Unless part of an approved grassroots lobbying effort, we must avoid communicating or acting in a manner that could mislead others into believing our personal views are those of Elevance Health. Go to the Personal political activity and contributions for additional information.

Federal law prohibits gifts to federal Executive and Legislative branch officials, including, among other things, tickets, travel, food, and logo items. Many state and local laws, and foreign laws, also have prohibitions or restrictions. Because of the penalties associated with these laws and requirements, any exception must be preapproved by Elevance Health's Senior Vice President of Public Affairs, Chief Compliance Officer, and at least a Vice President of the business unit conducting the activity.

In addition, inviting government officials (domestic or foreign) to participate in Elevance Health-sponsored events, whether in-person or virtual, requires prior approval from and coordination on all event logistics with Elevance Health's Public Affairs Department. Contact the Elevance Health Public Affairs Department with questions.

Antitrust Laws

We comply with applicable antitrust laws. We independently determine the pricing structure of our products and provider contracts, subject to applicable regulatory review.

Antitrust laws are intended to provide customers with a variety of products at competitive prices unrestricted by artificial constraints such as price fixing, illegal cartels, and boycotts. Contact the Legal Department and refer to the Antitrust Compliance policy with questions about the kinds of conduct that could implicate antitrust laws.

Q&A

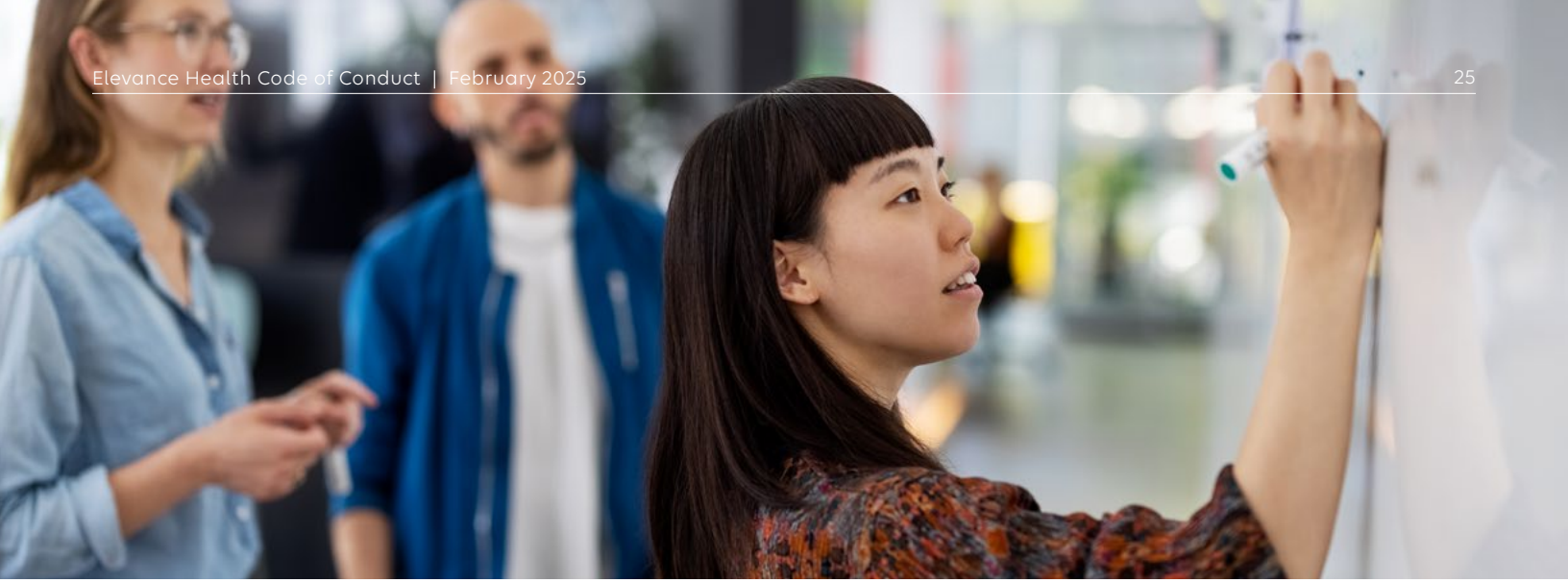
Q. A vendor invited me to a round of golf and dinner to discuss its current contract performance and other related matters. Can I accept the offer?

A. Yes, but if the value of the dinner and golf is over $200, you must receive advance approval from your manager.

Q. I pre-purchased some professional basketball tickets to take a vendor with me to a game. I had an unexpected personal emergency, and now cannot go to the game with the vendor. I do not want these tickets to be wasted. Can I just give them to the vendor?

A. If the value of the tickets is under $100, and you have not reached the $200 annual limit in a calendar year with this vendor, you may give them the tickets as a gift.

If the tickets are greater than $100 in value, you normally may not give the tickets as a "gift," as it would violate our gift policy. You should instead find another associate(s) who could accompany the vendor to the game for business entertainment purposes. Go to the Travel & Expense Reimbursement policy.



Procurement

We must maintain an honest, objective, and efficient procurement process. The purchase of materials and services must be in accordance with our procurement policies.

Purchasing decisions must be based solely on predetermined selection criteria, including, but not limited to, quality, performance, and price. Relations with suppliers must be maintained on an objective basis, free from the influence of gifts and favors.

All buying and selling decisions must be independent. Elevance Health associates who are in positions to influence purchasing decisions for Elevance Health must be able to recognize reciprocity and consult with the Legal Department and/or the Ethics Department about its implications when potential reciprocity is identified.

In addition, we have a Supplier Code of Conduct that all of our vendors must adhere to while they are conducting business with and/or on behalf of Elevance Health. Vendors are responsible for ensuring that their employees and subcontractors adhere to our Supplier Code of Conduct. NGS also has its own Supplier Code of Conduct.

Kickbacks

We may not offer, solicit an offer, provide, or receive kickbacks of any kind. Anti-kickback laws impose criminal and civil monetary penalties on individuals and companies who offer, give, solicit, or accept a kickback. Even an attempt to offer a kickback or an attempt to obtain a kickback may violate the law.

The scope of this prohibition is far reaching and can include things such as: self-referrals by members in exchange for incentives and referrals to enroll in any of our products receiving federal or state funding and incentives to encourage providers to steer members to us. The laws prohibiting kickbacks are very broad and cover many of our relationships with vendors, providers, brokers, and potentially even our members. The Legal Department should be consulted before offering, giving, soliciting, or receiving anything of value that is not a bona fide, fair market value payment for actual services or items provided.

We must not, directly, or indirectly, make or offer bribes or kickbacks to any third party, for the purpose of wrongfully obtaining, retaining, or directing our business. This includes, but it is not limited to, preferential hiring, or giving or favors of anything of value to any government official.

Q&A

Q. What does a kickback typically involve?

A. A kickback can be money, gifts, entertainment, services, promises, or anything else of value.

A kickback is giving, offering, soliciting, or receiving anything of value to induce or attempt to induce referrals or as a reward for referring a person to another person or entity to receive items or services paid for, in whole or in part, by a healthcare program (includes Medicare Advantage, state Medicaid and CHIP programs, among others) or in connection with a prime federal government contract.

Vendor Relationships

Third parties such as vendors, pharmaceutical manufacturers, or physicians may offer cash, materials, services, or equipment to be used for company activities like member or provider education and disease management programs. These offers have the potential to be perceived as bribes, kickbacks, or unfair sales practices and could violate company policies and laws.

We may not:

- Receive cash directly or indirectly from an external source without any services or services of comparable value.
- Receive products or services for free or at less than fair market value, such as:
  - Materials to be distributed internally or externally.
  - Offers to perform member/provider mailings solely, or primarily, on our behalf at no cost to us.
  - Joint activities, such as health fairs or other marketing activities.
  - A waiver of seminar fees.
  - Anything with more than a nominal value from an external source, for which no payment or payment of less than fair market value by the company is involved.

External sources such as charities, non-profits, professional societies, vendors, industry groups, public policy advisory groups, and other external sources, may extend offers of paid travel and lodging expenses, waiver of conference fees, and compensation for participating in conferences, seminars, or other meetings. Generally, if the sponsor is waiving the conference fees for all speakers at the event, and we are an invited speaker, then we can also accept the waived conference fees. However, any offers for honoraria, stipends, or any other type of compensation offered must be declined.

Q&A

Q. Can we endorse a vendor's product?

A. Our general policy is to decline vendor endorsement requests unless the circumstances warrant an exception to our policy. The Supplier Requests to Reference Elevance Health Company Names and/or Brands policy allows for exceptions, which are granted on a case-by-case basis. A vendor cannot use Elevance Health as a reference without an approved policy exception. Contact Corporate Communications with any questions regarding requests for endorsements or to request a policy exception.

Q. A current vendor has offered to pay for our travel and lodging expenses to visit their headquarters. Can my team accept the offer?

A. Generally, no, unless there is contractual language in the vendor contract covering the vendor paying for Elevance Health associates to conduct site visits, inspections, or training. Elevance Health must pay for the expenses related to traveling to the vendor's locations for legitimate business reasons. The Ethics Department must review and approve any unique situations where a policy exception may be granted.

Some limited offers of paid travel and lodging expenses from professional societies, charities, industry associations, public policy development groups, and non-healthcare vendors may be allowed. Any offers extended to us by event organizers to pay for our travel/lodging expenses require review and approval from the Ethics Department. Contact the Ethics Department to review the offer before accepting.

Business Relationships With Pharmaceutical Manufacturers

Compensation received directly or indirectly from a drug company is subject to both state and federal regulation. Such compensation creates a potential to influence, or appear to influence, our business decisions regarding our coverage of drugs or utilization management decisions. Certain highly trained associates have the responsibility to negotiate with drug companies and no associate should engage in any activity that gives rise to compensation from a drug company without consulting the Legal Department.

Business Agreements

All business agreements must be in writing and clearly state the services to be performed, the basis for earning the commission or fee, and the rate or fee.

Other Key Laws That Impact Our Business

The Telephone Consumer Protection Act of 1991
The Telephone Consumer Protection Act of 1991 (TCPA) regulates the way we place calls and send text messages to consumers. Elevance Health's Telecommunications policy sets forth how to comply with the TCPA and other related laws, and honor consumer requests to be placed on Elevance Health's Do Not Call list.

Non-Discrimination Under the Affordable Care Act
In the context of insurance contracts issued under the Affordable Care Act (ACA), health insurers cannot exclude from participation in, deny benefits of, or subject to discrimination any person based on race, color, national origin, sex (including sexual orientation and gender identity), age (if 40 or over), or disability status.

With regard to offering group or individual health insurance coverage, Elevance Health may not discriminate, with respect to participation under the plan or coverage, against any care provider who is acting within the scope of their license or certification under applicable state law. However, Elevance Health is not required to contract with any care provider and may establish varying reimbursement rates based on a care provider's quality or performance measures. Also, learn about our Prohibition on Discrimination in Marketing and Enrollment pertaining to government business contracts in the Doing Business with the Government section.

"Supporting the truth, even when it is unpopular, shows the capacity for honesty and integrity.

— Steve Brunkhorst

Doing Business With the Government

Much of our business comes from contracting directly with U.S. federal and state governments and this section primarily deals with U.S. operations. Business conducted outside the U.S. may be subject to the laws and regulations of other countries as well. Business units performing under U.S. government contracts (federal, state, or local), must comply with additional laws and program requirements. If we are unsure of these additional requirements, we should contact our manager or business unit's Compliance team for guidance. Go to the Gifts and Special Courtesies portion of this Code for more information on giving gifts to government officials. You can also review the Lobbying/Contacting Federal, State, and Local Elected Officials, Regulators, or Government Agencies sections for this information and for rules related to contacting government officials.

Monitoring for Excluded Persons

In its role as a government healthcare program contractor, Elevance Health may not employ or contract with anyone, or any entity who has been barred from taking part in any government programs or receiving government funds. Elevance Health represents at the time of entering into an agreement, that neither it nor its associates, contractors, subcontractors, or agents are ineligible persons identified on the General Services Administration's (GSA) List of Parties Excluded from Federal Program, HHS/Office of Inspector General (OIG) List of Excluded Individuals/Entities, and Medicaid State-Specific Exclusions List.

It is therefore our policy to screen applicable associates, contractors, subcontractors, or agents at the time of hiring/contracting and on a monthly basis thereafter to confirm that none are ineligible persons. We also require our vendors to screen their employees, subcontractors, or agents prior to hire or engagement and monthly thereafter.

We should consult with our manager or our business unit's Compliance team for the screening policies applicable to our business unit.

Prohibition on Discrimination in Marketing and Enrollment

Elevance Health does not take part in any discriminatory marketing, enrollment, disenrollment, medical management, benefit design, provider contracting, or other policy or practice designed to inappropriately prevent or discourage enrollment in, or encourage disenrollment from a health plan based on race, color, ethnicity, national origin, religion, age, gender, gender identity, mental or physical disabilities, sexual orientation, genetic information, including pregnancy and expected length of life, present or predicted disability, degree of medical dependency, quality of life, or other health condition or health status.

Health factors that may not be considered for marketing or enrollment purposes include medical condition, claims experience, use of healthcare service, medical history, genetic information, evidence of insurability, and disability (subject to special rules relating to end-stage renal disease under Medicare Advantage plans).

Federal laws also forbid discrimination against providers serving high-risk groups or specializing in conditions requiring costly treatment. We will not select or reject providers based on these factors.

All of our government sponsored health plans are subject to restrictions on, and requirements for, marketing and other promotional and/or sales activities and the content of materials. They also require that sales and marketing presentations fairly and accurately describe our products and avoid misleading consumers.

If these considerations are applicable to our job responsibilities, we should seek guidance from our manager.

False Claims Act and False Statements Act

The federal False Claims Act (FCA) imposes civil and criminal penalties on those who defraud the U.S. government and/or improperly act to avoid paying money to the U.S. government (e.g., keeping money the government paid in error). Many states have enacted their own versions of the FCA that impose similar civil and criminal penalties. Violations of other laws, like the Anti-kickback statute or Stark, may create liability under the FCA. Contact the Legal Department with any concerns about the FCA.

The False Statements Accountability Act imposes criminal penalties on anyone who falsifies or covers up (including an intentional failure to disclose) a material fact in connection with a U.S. government matter (including U.S. government contracts).

Stark Law

The Stark Law is a healthcare fraud and abuse law that prohibits physicians from referring individuals to any entity in which the physician has a "financial relationship" for specified "designated health services" for which Medicaid or Medicare pays. The term "financial relationship" includes any direct or indirect ownership or investment interest by the referring physician, as well as, any financial interests held by any of the physician's family members. The government can bring a civil action against Stark Law violators under the civil monetary penalties law. Stark Law violations can result in penalties of up to $15,000 for each billed service based on a prohibited referral, as well as three times the amount of the government overpayment. Contact the Legal Department regarding any concerns about Stark compliance.

Obstruction of a Federal Audit

We may not wrongfully influence, obstruct, or impede a federal auditor in the performance of official duties. Failure to permit access may result in penalties up to $15,000 per day.

Restrictions on Obtaining and Disclosing Certain Information Statute

The restrictions on obtaining and disclosing certain information statute restricts the activities of government contractors and individuals or companies seeking contracts with the government.

We may not:

- Offer gifts or anything of value to government officials or competing contractors.
- Discuss future employment possibilities with government officials or competing contractors.
- Offer to pay fees contingent upon the award of a federal contract to an employee or third party who holds itself out as being able to obtain the contract through improper influence.
- Solicit or obtain from government officials, any proprietary information about competitors, or source selection information that is not publicly available including, but not limited to:
  - Proposed prices
  - Source selection plans
  - Technical evaluation plans
  - Elevance Health or competitors' proposed prices or costs
  - Elevance Health or competitors' approaches, processes, operations, or techniques
  - Elevance Health or competitors' information identified as contractor bids, proposal information, or restricted data.

The same guidelines apply when interacting with competitors.

Truthful Cost or Pricing Data Act

Under certain U.S. government procurements, contractors and subcontractors are required to submit certified cost or pricing data to the government. Knowingly violating this act can result in criminal and civil penalties.

If we are involved in U.S. government contracting, we may be asked to sign such a certification. We should consult with the Legal Department before signing such a certification and retain copies of costs or pricing information connected to a U.S. government contract. We maintain records in accordance with our Record Retention Schedule, which is in compliance with federal and state record retention requirements. Contact the Legal Department with questions.

Doing Business Across the Globe

We are responsible for conducting business in accordance with the laws of all impacted countries where we do business. We are subject to local laws, regulations, and jurisdictions. Contact your manager, Compliance, or the Legal Department, or reach out to the Ethics Department with questions.

Bribery and Corruption

Elevance Health prohibits any form of bribery or corruption, whether in commercial dealings with private parties or in dealings with officials of any government. We are committed to complying with the U.S. Foreign Corrupt Practices Act (FCPA), the U.S. Travel Act, the U.K Bribery Act, Ireland Criminal Justice (Corruption Offences) Act 2018, and all other applicable anti-bribery laws.

We must not, directly or indirectly through a third party, make or offer anything of value to anyone to improperly obtain or retain business. Nor may we improperly influence any action to benefit Elevance Health. Anything of value can include, but is not limited to, gifts, services, favors, or preferential hiring.

We must follow due diligence requirements before Elevance Health engages a third party to act on its behalf in conducting international business. Elevance Health has adopted approval procedures that must be followed when giving gifts, entertaining, and engaging in certain sales and marketing activities with foreign government officials. These activities require prior review and approval in accordance with the Global Anti-Corruption Policy, Anti-Bribery, and U.S. Foreign Corrupt Practices Act Policy.

Facilitating or Expediting Payments

The FCPA's bribery prohibition contains a narrow exception for "facilitating or expediting payments" made in furtherance of routine government actions. Routine government actions include processing government paperwork, such as visas and work orders, providing police protection or mail service, and supplying utilities such as phone service, power, and water. The facilitating or expediting payment exception is very narrow. It does not include a procurement decision to award new business or to convince a business to contract with a particular party. Even if permitted under the FCPA, facilitating or expediting payments may be prohibited by local law. For these reasons, Elevance Health's Global Anti-Corruption, Anti-Bribery, and U.S. Foreign Corrupt Practices Act (FCPA) Policy prohibits the making or authorizing of such payments without prior review and approval by the Elevance Health Chief Accounting Officer (CAO) and the Chief Compliance Officers (CCO), or their designees, and the Legal Department.

Review Elevance Health's Global Anticorruption Policy, or contact Compliance or the Legal Department with questions.

Anti-Boycott

Anti-boycotting laws do not allow boycotting certain countries, goods, and services, as well as discrimination.

Barred Countries/Office of Foreign Asset Control Screening

The Office of Foreign Asset Control (OFAC) is part of the U.S. Treasury Department that administers and enforces economic and trade sanctions against certain countries and individuals, such as terrorists and narcotics traffickers. OFAC publishes a list of Specially Designated Nationals and Blocked Persons. All U.S. companies must screen all individuals and countries they do business with against the lists to ensure that the company does not do business with individuals or entities on the lists (unless a license is obtained). We conduct such screening to ensure there are no electronic wire transfers or other payments made to affected countries, entities, or individuals.

Human Rights

Elevance Health supports the basic, fundamental rights of all individuals and communities in our business ecosystem. We commit to respecting, and promoting the principles of internationally-recognized human rights and strive to proactively prevent, mitigate, and remedy negative human rights impacts which may arise from our business operations and activities. In addition to following applicable laws, our company practices and policies promote a culture where individuals are respected and their rights are protected.

The commitment to respect human rights extends to our affiliates, business partners, and suppliers, who we expect to uphold the same level of respect for human rights in their business activities. Through our supplier code of conduct, suppliers agree to uphold decent labor practices that include a healthy and safe work environment, fair labor practices, freedom from harassment, and freedom of association and collective bargaining. Elevance Health and its affiliates are committed to operating with the highest integrity in a manner consistent with the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's Core Conventions. Specifically, we support collective bargaining in good faith with recognized unions.

These fundamental human rights include the prohibition of child labor, the prohibition of forced labor in all forms, freedom of association, and the right to privacy, the right to health, the right to a healthy environment, protection from discrimination. Discrimination includes employment decisions based on personal characteristics that are unrelated to the ability to do one's job, including race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by applicable federal, state, or local laws, except where a bona fide occupational qualification applies.

Assess to a grievance mechanism and remedy are fundamental to upholding our commitment to human rights. Elevance Health associates are expected to complete Code of Conduct training on an annual basis, to report suspected human rights violations, and to cooperate in company investigations. Elevance Health takes all reports seriously, and retaliation for good-faith reporting is strictly prohibited.

Please refer to the reporting misconduct and ethics concerns section in this Code for stakeholders including consumers, suppliers, and associates to confidentially and anonymously report violations and concerns to Elevance Health Ethics and Compliance Department.

Elevance Health
220 Virginia Avenue
Indianapolis, IN 46204
800-331-1476

elevancehealth.com