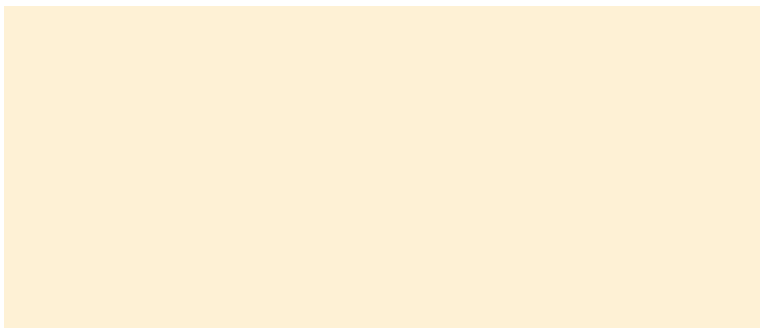
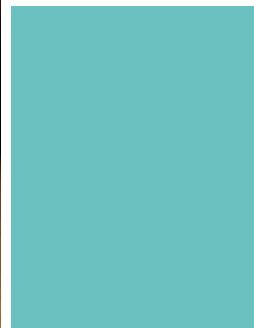




UnitedHealth Group®

*Principles of
Ethics & Integrity
Your Guide to Business Conduct*



Dear Colleagues:

UnitedHealth Group is committed to achieving and maintaining world-class levels of corporate governance and ethical business conduct. Our goal is to advance a company and culture that fosters a real dedication to care and serve, to innovate and grow, and to meet our high standards of business practice and performance.

As a company, we are uniquely positioned to have a dramatic effect on one of society's most important and sensitive areas of responsibility - helping to maintain, ensure and improve the health and well-being of others. In our efforts, employees, customers, regulators, investors, physicians and care professionals, and other participants in the health care system expect - and deserve - honesty and integrity from UnitedHealth Group at all times and in all matters.

As a core aspect of UnitedHealth Group's Ethics and Integrity Program, we have adopted and embraced the Principles of Ethics and Integrity, which outline basic principles and expected behaviors for employees at all levels to follow as we serve our many stakeholders and achieve our important mission. These principles and expected behaviors, coupled with your own personal sense of fairness, honesty, stewardship and accountability, will help to ensure that we do the right thing in our day-to-day business activities and long-term decision-making.

We must never sacrifice our principles or overlook our personal responsibility for ethical behavior as we work toward achieving our business goals and long-term enterprise mission.

Thank you for your enduring commitment to the ethical business conduct of UnitedHealth. Together we will continue to achieve greatness with dignity and pride.

Sincerely,



Stephen J. Hemsley
CEO and President

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Our Mission

CORE PURPOSE:

To improve the health and well-being of individuals.

CORE VALUES:

Everything we do will be driven by the following:

- Systemic improvement in health care
- Respect for the patient-physician relationship
- Commitment to leading edge innovation
- Compassion for people
- Honesty and Integrity

GUIDING PRINCIPLES:

As employees, we will do the following:

Look beyond the horizon. We will not be content with the status quo. We will continue to explore new opportunities, propose new ideas, and search for better ways to meet the needs of our customers.

Work together. No one has all the answers. We will treat each other with respect and solicit advice and assistance from our co-workers. The best work comes from sharing our talents and hard work with each other.

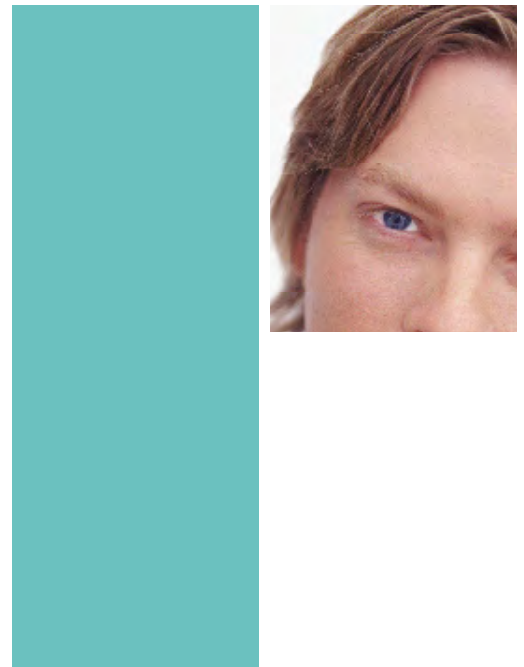
Think like customers. In every decision we make, we will consider the value it provides to our customers. We will treat our customers the way we would want to be treated—with compassion, respect and unsurpassed service.

Act like owners. We will take responsibility for moving business objectives forward. We will continually raise our own expectations of what can be accomplished, and we will hold ourselves accountable for reaching the goals we set.

LIVING OUR MISSION

Here are ways we can show in our day-to-day actions that we are living the UnitedHealth Group mission:

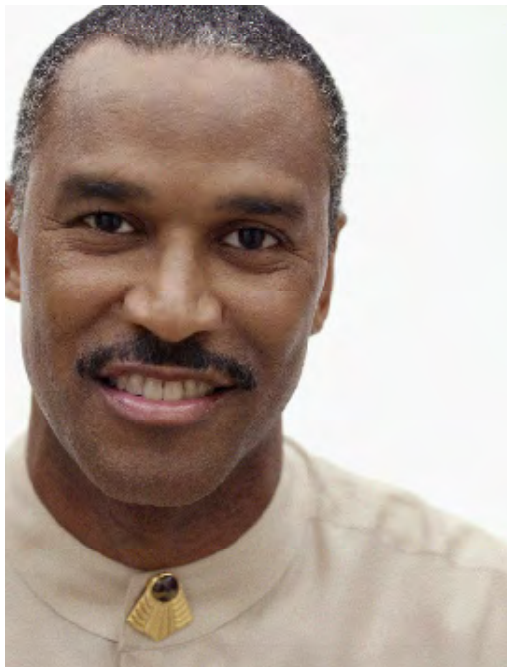
- Respect each other and listen with an open mind.
- Trust each other.
- Keep our commitments.
- Speak with honesty and candor.
- Reach and acknowledge closure on decisions.
- Support and represent team decisions as our own.
- Place team interests before our own.
- Provide complete and impartial information.
- Actively recognize and celebrate successes.
- Address conflict in a direct, constructive and confidential manner.
- Include the stakeholders in decisions.
- Plan before we act.
- Address each other about any violation of our standards of business conduct.



Introduction

LOOK TO FRONTIER FOR THE MOST CURRENT INFORMATION

Check the Ethics and Integrity site on Frontier to review the most current versions of these Principles of Ethics and Integrity, the UnitedHealth Group Policy Manual and other documents referenced here. Go to Corporate Services from the home page, then Ethics and Integrity.



COMMITMENT TO INTEGRITY

Honesty and integrity are core values of our organization. Our commitment to these values has helped us earn a reputation as one of the most admired companies in America today.

The need to make sound, ethical decisions as we interact with participants, customers, regulators, physicians and other health care providers, investors, suppliers, colleagues and communities has never been greater. It's not only the right thing to do, it's necessary for success now and in the future.

Because UnitedHealth Group is committed to the highest standards of integrity, the company implemented its Ethics and Integrity Program. A description of UnitedHealth Group's Ethics and Integrity Program is available on Frontier, the company's Intranet. You can find it by choosing Corporate Services on the navigation bar, then Ethics and Integrity. Then select Program Descriptions from the menu on the left. If you do not have access to Frontier, you may check with your manager or call the Ethics & Compliance HelpCenter 1-800-455-4521, to obtain copies of the program description, these Principles or other referenced documents.

COMPANY POLICIES

These Principles are meant to alert employees to major legal and ethical issues that may arise. It is not a detailed rule book.

These Principles outline many, but not all, of UnitedHealth Group's business conduct policies. Policies that are generally applicable to most employees are available in UnitedHealth Group's Policy Manual on Frontier's Ethics and Integrity site. Employees are responsible for being familiar with the policies in the Policy Manual. If you do not have access to Frontier and want a copy of a policy, ask your manager or call the Ethics & Compliance HelpCenter (1-800-455-4521).

In addition to the policies in the Policy Manual, there are many policies that specifically relate to certain business units, departments or products. Each business unit will communicate these specific policies to employees and others who are affected by them and who must comply with them as they conduct business for the company.

These Principles and other company policies can not address every situation employees may encounter. Consequently, UnitedHealth Group relies on the good judgment and values of its employees and managers to implement the intent of these Principles when company policies do not address a specific situation. If an employee is still not sure what to do, the employee should request guidance from the resources identified in these Principles.

PERSONAL ACCOUNTABILITY

All of us are personally accountable for our decisions and actions. We each must follow a course of conduct that preserves and enhances UnitedHealth Group's reputation for honesty and integrity. To do so, it is critical that we understand the laws, company policies and contractual obligations that apply to our specific area. And, we should never misuse our authority, whether for personal interests or to the detriment of UnitedHealth Group.

ADDED RESPONSIBILITY FOR MANAGERS

While all UnitedHealth Group employees must follow these Principles of Ethics and Integrity, each UnitedHealth Group manager must be an example for those in his or her group. They must know these Principles, the Policy Manual and any business unit and department policies that apply to their area of responsibility. Managers must create and maintain a workplace where employees and contractors know that ethical and legal behavior is expected of them.

CONTRACTOR ACCOUNTABILITY

In some cases, all or part of these Principles and other company policies may apply to those acting on behalf of the company such as sales agents, external advisors, contractors, consultants and others. The business person responsible for the relationship and their in-house legal counsel should decide if these Principles or any company policies apply to a contractor.

VIOLATIONS AND CONSEQUENCES

Failure to follow these Principles of Ethics and Integrity, any other company policies, applicable laws and contractual obligations will compromise UnitedHealth Group's good name. Unethical or illegal acts cannot be justified by saying they were for the good of the company or were directed by a higher authority in the company. No employee is ever authorized to commit, or direct another employee to commit an unethical or illegal act. In addition, employees cannot use a contractor, agent, consultant, broker, distributor or other third party to perform any act not

allowed by law, these Principles, any company policy or any applicable contractual obligation.

The goal of these Principles is to promote proper conduct and avoid the need for discipline. However, all violations of the law, these Principles, company policies and contractual obligations will be taken seriously and may result in discipline, up to and including termination.

In addition, employees who commit criminal or illegal acts may face immediate termination and possible legal action.



Quick Quiz

Each employee brings professional skills and personal values to his or her job.

When faced with a difficult situation, it may help to ask these questions:

- Are my actions legal?
- Am I being fair and honest?
- Will my actions stand the test of time?
- How will I feel about myself afterward?
- How will it look in the newspaper?
- Will I sleep soundly tonight?
- What would I tell my child to do?

After asking these questions, if you're still not sure of the proper course of action, ask – and keep on asking until you're sure you are taking the right action.

Asking Questions and Reporting Misconduct



RESOURCES FOR QUESTIONS

You may talk to your manager about any questions you may have and any action you believe may violate these Principles, the law, company policies or any contractual obligation. If you are not comfortable talking with your manager or you have already done so and you think the problem has not been completely resolved, there are several other resources you can contact, including:

- A more senior manager in the business unit
- The business unit compliance officer
- HRdirect (800) 561-0861
- Corporate Employee Relations
- The Legal Services Department
- UnitedHealth Group's Ethics and Integrity Office
- The Ethics & Compliance HelpCenter by phone, 1-800-455-4521 or via the intranet (Frontier > Corporate Services > Ethics and Integrity > Ethics & Compliance HelpCenter)

YOUR DUTY TO REPORT MISCONDUCT

To protect UnitedHealth Group's reputation – as well as your personal reputation – you must promptly report illegal or unethical conduct to an appropriate company representative. Failure to report suspected violations violates these Principles of Ethics and Integrity and can lead to discipline.

If you have any concerns about reporting the conduct to your manager or you have done so and the conduct has not been corrected, contact one of the resources identified above.

Managers who receive reports of possible illegal or unethical conduct must take immediate action. The type of action that should be taken depends on the alleged misconduct. The manager should carefully identify and involve all possible stakeholders. If the matter involves employment issues or could affect an employee's employment status, the manager must contact HRdirect.

COOPERATING WITH INTERNAL INVESTIGATIONS

If the company initiates an investigation to determine whether there has been illegal or unethical conduct, you must cooperate with the investigation and disclose all information and records you are aware of that are relevant to or will assist the investigation. Failure to cooperate with an internal investigation violates these Principles and can lead to discipline.

CONFIDENTIALITY, RETALIATION AND FALSE REPORTS

To the extent possible, the company will take reasonable precautions to maintain the confidentiality of those who report an integrity or compliance concern.

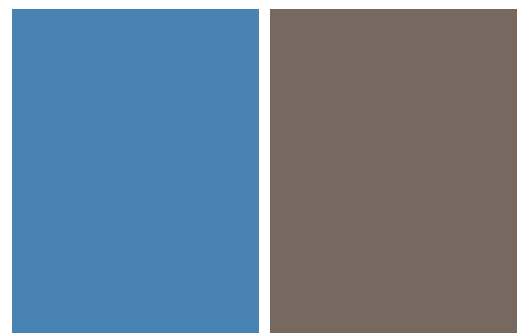
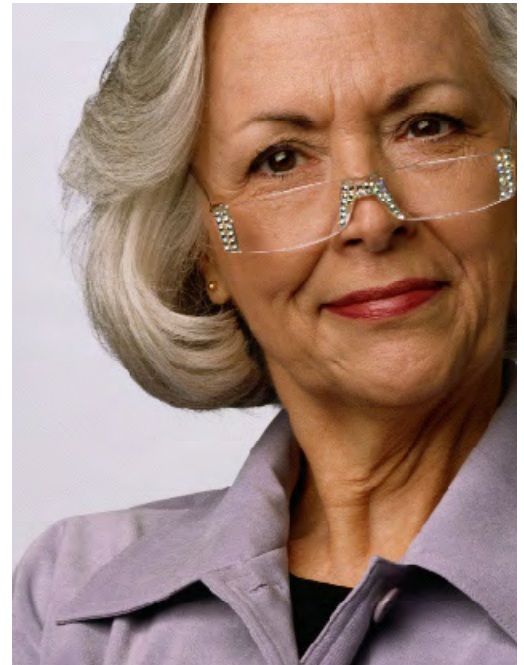
Any retaliation against an employee who, in good faith, reports a suspected violation of these Principles, company policies, the law or contractual obligations, is not allowed and should be immediately reported to HRdirect or the Ethics & Compliance HelpCenter.

Making malicious or purposely false reports also violates these Principles of Ethics and Integrity.

KEY CONTACTS

Due to the fast pace and many demands of our company, at times the best course of action in any given situation may not be obvious. UnitedHealth Group offers many options to help you discuss issues or report concerns.

■ Manager	Your best contact for workplace issues.
■ HRdirect (800) 561-0861	Your contact for compensation and employment concerns, or policy guidance and interpretation.
■ Corporate Employee Relations (952) 936-1758	Your contact for employment or workplace issues; or policy guidance and interpretation.
■ Optum® (888) 842-4224	Your contact for help with health, family, substance abuse, and other personal issues.
■ Corporate Security (952) 936-1310	Your contact to report concerns regarding employee security.
■ Risk Management (952) 936-1152	Your contact to report unsafe conditions, workplace hazards and potential claims against insurance policies.
■ Ethics & Compliance HelpCenter Available 24 hours a day, 7 days a week by phone at (800) 455-4521 or at online via the intranet (Frontier >Ethics & Compliance HelpCenter, under Quick Links)	Your contact for advice on and help interpreting these Principles and company policies, or to report violations of the Principles, company policies, or the law.
■ Ethics and Integrity Office (952) 936-7463 Mail Route: MN008-T700 E-mail: Ethics-Integrity_Office@uhc.com	Your contact for advice on interpretation of these Principles and company policies, and for advice on ethics and integrity training needs.



Accuracy of Company Records

UnitedHealth Group needs correct information and reliable records to make sound business decisions and to submit reports to customers and governmental agencies. You must be complete, accurate and honest when recording, reporting and retaining company information. This includes business records involving quality, safety and personnel, as well as time, expense and other financial records.

All business records produced by employees, including those kept off company premises, are the property of the company.

All financial books, records and accounts must correctly reflect transactions and events, and conform both to generally accepted accounting principles and to UnitedHealth Group's system of internal controls. Here are more guidelines to keep in mind:

- Do not make false or misleading entries or omit information in any of UnitedHealth Group's systems, books or records for any reason. Keep systems, books, records and accounts in reasonable detail so they correctly reflect transactions and events.
- Fill out expense reports and attendance reports correctly and completely and show the correct purpose and amount of each item on expense reports.
- The most senior employee at a function should include the costs for the function in an expense report.

- Do not create or keep secret or unrecorded funds, assets or accounts for any purpose.
- Never purposely pay or approve an invoice, expense report, or other document that is not correct, not accurate, or is misleading. Always use care when reviewing documents before approving them.
- Properly and consistently follow cost accounting standards and principles of cost allowability, as well as relevant company policies and procedures and contractual obligations.
- All invoices to customers and others should correctly note the products sold or services performed, the true sales price, and the terms of sale. Promptly refund payments that are more than amounts billed, or credit customer accounts.

(See the Accurate Books and Records and the Records Management policies)

What if...

Q: *One of my work assignments includes a contract with the federal government for which UnitedHealth Group is paid on a cost basis. My manager told me to bill 75% of my time to the government contract – but I only spend 25% of my time working on that contract. What should I do?*

A: Accurate time accounting for government cost contracts is essential. Failure to maintain accurate time accounting could result in serious fines and penalties for UnitedHealth Group – and perhaps exclusion from future government business. Immediately contact the attorney assigned to your business unit or call the Ethics & Compliance HelpCenter (By phone, 1-800-455-4521, or online via the intranet, Frontier > Corporate Services > Ethics and Integrity > Compliance Help Center).

Business Courtesies

GENERAL

Gifts, favors, travel and entertainment may cause a conflict of interest with your work at UnitedHealth Group. As a result, always follow these simple guidelines:

- Never offer or accept a gift, favor, travel or entertainment of more than a nominal value, unless approved in advance as required by the company's Business Courtesies policy.
- Never accept or provide gifts, favors, travel or entertainment of any value if it will compromise or appear to compromise your judgment.
- Never solicit gifts, favors, travel or entertainment, except for company approved causes.
- Never offer a gift, favor, travel or entertainment to a government employee unless you have confirmed with Legal Services in advance that you may do so.

To help you make the right decision, ask yourself these questions when giving or receiving any business courtesy:

- Is it legal, customary and in good taste?
- Is it clearly related to UnitedHealth Group business?
- Would I feel okay giving or receiving the gift or business courtesy in front of others?

If you have any doubts about the effects the gift, favor, travel or entertainment could have on the company's reputation or your personal reputation, you should not offer or accept it.

Please note that these guidelines apply to actions with those outside of UnitedHealth Group. This section does not apply to actions between the company and its employees, nor actions among UnitedHealth Group employees.

(See the Business Courtesies policy)

GIFTS

UnitedHealth Group's gift policy embraces a "rule of reason." As a general rule:

- You may accept gifts of nominal value, such as promotional items (T-shirts, mugs, baseball caps) given in the regular course of business. But, you should not accept small gifts on a regular or continual basis.
- Do not accept gifts of money or cash equivalents.
- When giving gifts, make sure they are in keeping with the business relationship and do not appear to be attempts to obligate or influence the recipient.
- Do not offer any gift, favor, travel or entertainment if it is against the policy of the recipient's organization. Many companies have policies that do not allow any gifts.
- In the case of the government, the offer of anything, sometimes even a cup of coffee, may be against the law. And gifts to foreign government officials may violate the Foreign Corrupt Practices Act (see Page 19).
- When in doubt, check with your manager, the Legal Services Department, HRdirect or the Ethics & Compliance HelpCenter (1-800-455-4521).

Offering or taking bribes, kickbacks, payoffs or other unusual or improper payments to obtain or keep business is unethical, illegal and strictly forbidden.

What if...

Q: *One of our suppliers gave me a basket of food during the holidays. Was it OK to accept it?*

A: You may accept small tokens of appreciation, as long as they don't appear to obligate or influence you or the company. If possible – like with baskets of food – you are encouraged to share the gift with your colleagues. Also, if you are not sure, ask your manager or HRdirect, or you can call the Ethics & Compliance HelpCenter (1-800-455-4521).



FAVORS

Do not accept discounts when buying a supplier's or customer's products or services for personal use, unless the discounts are offered to UnitedHealth Group employees in general. Never solicit or accept special treatment on loans, stock offerings, or other services unless the treatment is available to all other employees.

ENTERTAINMENT AND TRAVEL

Entertainment is often helpful in building and maintaining business relationships. UnitedHealth Group employees may accept invitations for entertainment that is reasonable in the context of the business, or that furthers the company's interests. For example, in most cases you may attend a cultural event, sporting event, or business meal with a business contact, or attend a supplier's holiday or celebratory function. But, generally you should not accept tickets for an event the business contact will not be attending, such as tickets for a sporting or cultural event.

Business courtesies involving travel and lodging are cause for more serious concern. You should not accept travel or lodging without your manager's consent.

You may not entertain guests, employees or customers where there is "adult entertainment", as this is not suitable for business purposes.



GOVERNMENT EMPLOYEES

There are very strict rules about what may be offered to government employees. The rules depend on the nature of the relationship between UnitedHealth Group and the government employee.

If the government employee is a contract officer for a contract we have or are seeking, the rules are very strict. In that case very little, if anything, can be offered to the person. In some cases, you may not even be able to offer beverages or food during a meeting.

If the person is a member of a legislative staff, you may be able to offer meals or entertainment without breaking the law – but you need to make sure you strictly follow any restrictions that apply.

If you have regular contact with government employees, you must know and carefully follow the rules that apply to those employees.

(See the Government Contracting policy)

Company Assets: Protection and Use

PROTECTING COMPANY ASSETS

UnitedHealth Group entrusts all employees with many company assets including financial assets, buildings, equipment, supplies and information assets, the time it pays employees to work and much more. Company assets must be maintained for business purposes and used for UnitedHealth Group's benefit. Everyone is responsible for protecting these assets from loss, damage, misuse or theft.

USE OF COMPANY ASSETS

As a general rule, personal use of UnitedHealth Group assets is not allowed. You may not use company resources for personal financial gain unrelated to the business of UnitedHealth Group.

(See the Employee Handbook, Information Security policy on HRdirect for more details.)

PERSONAL USE OF ELECTRONIC MEDIA

All communication systems, including phones, e-mail, the Intranet (Frontier), Internet access, and voice mail belong to UnitedHealth Group and you must use them primarily for business purposes. You are allowed limited reasonable personal use of UnitedHealth Group's communication systems, but you should assume these communications are not private. UnitedHealth Group reserves the right to access, monitor and disclose the contents of phone calls, e-mail and voice mail messages and internet usage.

You may not use internal communication channels or Internet access at work to access, post, store, transmit, download or distribute threatening or malicious

materials or materials you know or should know are false or sexually explicit. This includes anything that is a crime or promotes criminal activity, gives rise to civil liability, or violates any laws. Also, among other things, you may not use company communication channels to send chain letters, personal broadcast messages, copyrighted documents not approved for reproduction, or to open incorrectly addressed mail or look for a job outside of UnitedHealth Group. Also, use of electronic instant messaging, and downloading, storing and/or transmitting non-business related multi-media is prohibited.

Employees who abuse the company's communication systems or use them

inappropriately for non-business reasons may lose these privileges and be subject to discipline, up to and including termination.

(See the Employee Handbook, Security & Safety section on HRdirect for more details.)

INTELLECTUAL PROPERTY

Among UnitedHealth Group's most valuable assets is its intellectual property. Intellectual property includes materials, inventions or ideas that are copyrighted, trademarked or patented and trade secret information. Trade secrets are valuable Company information and intellectual property used and known by

What if...

Q: *Why does the company care if I use my company computer to surf the web or send personal emails – as long as I do it on my own time. It really doesn't cost the company anything.*

A: There is a cost associated with using the company computer – even if it is during your own time. Surfing the web involves more company resources than just the computer in your work station – there are also data lines and other company resources that are being used and, therefore, not available for company use. One company discovered the third most visited Web site by its employees was a music site and that 4 percent of its Internet capacity was being used by employees downloading music. Wouldn't it be frustrating to learn your computer is slow because of inappropriate Internet use by other employees? Also, remember when you go to a Web site, UnitedHealth Group is identified as the visitor. Imagine if it was publicized that you had visited a chat room that could be embarrassing to the company and you.



UnitedHealth Group that may not be subject to patent, copyright or trademark protections, but are not generally known by our competitors or other third parties.

Intellectual property includes, but is not limited to, the following types of categories: inventions; new product or marketing plans; business strategies and plans; detailed financial and pricing information, computer programs, models and data bases (including without limitation source codes), designs, analytical models; customer lists and customer information, supplier and vendor lists and supplier and vendor information. This list of categories is not exclusive but suggests the wide array of information that may be entitled to trade secret protection.

UnitedHealth Group owns all intellectual property you make, create, develop, write or conceive either on your own or with another person while employed by or contracted with UnitedHealth Group and whether developed during working hours or after working hours that:

- is related in any manner to the actual or anticipated business, research or development of the company;
- results from work assigned to or performed by you for the company; or
- is conceived of or made with the use of the company's systems, equipment, materials, facilities, computer programs or confidential information.

(See the Protecting Information Assets and Confidential Information policy)

PROTECTION OF INTELLECTUAL PROPERTY

UnitedHealth Group strives to protect its intellectual property through patents, copyrights, trademarks and treating other confidential and proprietary information as trade secrets.

You must carefully guard the secrecy of these trade secrets and confidential and proprietary information. Mark this information "Confidential," keep it secure, and limit access to only those who

need to know it to perform their jobs. Be careful not to discuss such confidential or proprietary information in public areas. Similarly, be careful when working on a laptop computer in a public area where others can view your work. Many companies' secrets have been lost in elevators, restaurants, airplanes and other public places.

Your duty to guard UnitedHealth Group's confidential and proprietary information and trade secrets continues after you leave the Company. Keep in mind that trade secret information includes not only that information contained in written or digitized documents, but also includes all such information that you may have committed to memory during the course of your job.

PROPERTY RIGHTS OF OTHERS

UnitedHealth Group believes in honoring copyrights and respecting the trade secrets of others. You must not make unapproved copies or reveal or use any trade secrets of a competitor, including a former employer, in connection with your duties at UnitedHealth Group. This includes customer lists, technical developments, or operational data.

If you obtain information by mistake that might be a trade secret or proprietary information of another company, immediately consult the Legal Services Department or the Ethics & Compliance HelpCenter (1-800-455-4521).

TRADEMARKS AND THE UNITEDHEALTH GROUP NAME

The UnitedHealth Group brand identity, including its name, logo, trademarks and service marks are among the company's

What if...

Q: *A new employee in our department used to work for a competitor and gave me a copy of the competitor's response to an RFP. The responses could be very helpful when preparing our RFP responses – can we use this information?*

A: No, unless the RFP response is public information. If it is not public information, it may be proprietary information, and should not be used by UnitedHealth Group. Use of another company's proprietary information could subject UnitedHealth Group to a lawsuit by the competitor. Immediately advise your manager, the Legal Services Department or call the Ethics & Compliance HelpCenter (1-800-455-4521) so they can counsel you and the employee on UnitedHealth Group's policies. The information may also have to be destroyed or returned to the competitor.

most valuable assets. To protect these assets, you must use them correctly and only to advance the company's interests. Consult the Legal Services Department with questions or concerns about the use of UnitedHealth Group's trademarks or name.

Guidelines for how to use the brand identities are also on the Corporate Communications site on Frontier.

(See the Trademarks and Service Marks policy)

COMMUNICATIONS WITH UNITEDHEALTH GROUP'S ATTORNEYS

Information you give UnitedHealth Group's attorneys to obtain legal advice about company business is generally protected by the attorney-client privilege. This privilege protects confidential attorney-client communications from being shared with others. You should keep these communications confidential and not share them with others, including other UnitedHealth Group employees, except on a need-to-know basis.

The attorney-client privilege belongs to the company, not to UnitedHealth Group employees. You should not consider anything you tell a company attorney to be protected from disclosure to management. You should also remember the attorneys are representing the company, not you.

You should not contact UnitedHealth Group's attorneys for advice about personal or employment issues. HRdirect, Corporate Employee Relations or Optum® are your resources for help with these issues. If you have questions about communications with UnitedHealth

Group's attorneys, please consult the Legal Services Department.

COMPUTER AND NETWORK SECURITY

UnitedHealth Group's business depends upon the continuous, efficient operation of its computer systems and networks. The company has a large investment in these assets. You must guard their integrity. Do your part by protecting passwords, IDs and access to computer systems. Never download unauthorized software or software licensed for personal use onto company computers. All computers must be protected with virus protection software. Take steps to avoid "viruses" from the Internet or unauthorized software, and protect the company from lawsuits by using only legally licensed software.

(See the Employee Handbook, Safety and Security section on HRdirect and the Software License Compliance policy for more details.)

CREATING AND RETAINING BUSINESS COMMUNICATIONS

Almost all business records and communications may become subject to public disclosure during litigation or governmental investigations. Business communications are also often obtained by outside parties or the media. As a result, you should try to be as clear, concise, truthful and accurate as possible when creating any information. Do not guess, exaggerate, use colorful language, legal conclusions, or negative characterizations of people or their motives. Remember that tone, such as sarcasm, can be misread and misinterpreted. This policy applies to

communications of all kinds, including e-mail and "informal" notes or memos.

Always save and destroy records as stated in UnitedHealth Group's Records Management policy. If litigation, an audit, or a governmental investigation is pending, do not destroy any related records. Direct any questions about documents pertaining to litigation, an audit or an investigation to the Legal Services Department.

(See the Accurate Books and Records and Records Retention policies)



Competition

Antitrust laws in the United States and fair competition laws in many other countries were put in place to promote healthy competition among businesses and to protect consumers against anti-competitive acts. These laws can be very complex. This section briefly covers issues common to many of them. If you have questions, contact the Legal Services Department.

- Agreements between competitors that limit competition are illegal and will not be tolerated. Examples include fixing prices or terms of sale; allocating products, markets, territories or customers; or agreeing to boycott certain

customers or suppliers.

- Never discuss or even listen to a discussion of present or future prices, profit margins or costs, bids or intended bids, terms or conditions of sale, market shares, sales territories, distribution practices or other competitive information with a competitor's representative. Merely talking about these issues with competitors may be viewed as an illegal agreement.
- Do not disclose a UnitedHealth Group bid or solicit information about a competitor's confidential bid. This may be viewed as a form of hidden agreement and you must avoid it.

Any employee who has a question about the potential antitrust implications

of a discussion, decision or action must consult with the Legal Services Department before any action takes place.

(See the Antitrust Compliance policy)



What if...

Q: *I have a friend who is a salesperson for a competitor. Whenever we go out together, we end up talking about business like the latest marketing and pricing strategies our companies have developed. Since we're friends – this isn't a problem is it?*

A: Your discussions involve two very dangerous areas. First, you may be disclosing information UnitedHealth Group considers confidential and proprietary. Second, any discussion of this type among the representatives to two competitors – even in a social environment – can be considered an antitrust violation. Discussions about marketing and pricing is particularly dangerous. If you have friends and acquaintances who work for UnitedHealth Group's competitors, you should not discuss anything that reveals confidential and proprietary information about UnitedHealth Group or that could be construed as a discussion about pricing, marketing, boycotts or other types of antitrust violations.

Conflicts of Interest

Business decisions and actions must be based on the best interests of UnitedHealth Group and not personal interests or relationships. Relationships with prospective or existing suppliers, contractors, customers, competitors or regulators must not affect your independent and sound judgment on behalf of UnitedHealth Group. Avoid any situation that causes or appears to cause a conflict of interest with UnitedHealth Group's interests.

(See the Avoiding Conflicts of Interest and Business Courtesies policies)

DISCLOSURE

The best way to avoid a conflict of interest is to disclose any relationships others might misinterpret. This includes any relationships with other employees, customers, suppliers and competitors. You should raise questions about possible conflicts of interest and disclose these kinds of situations to your manager or the Ethics & Compliance HelpCenter as they arise.

Some employees have additional responsibilities to disclose information at the time of hire and annually thereafter. See the Avoiding of Conflicts of Interest policy for details.

BOARD MEMBERSHIPS

You may serve on the board of directors of community or nonprofit organizations if your role does not affect your ability to perform your job for UnitedHealth Group. To make sure such activities do not cause a conflict of interest or other problem with your position at UnitedHealth Group, you should tell your manager. You also must get approval from the Office of the General Counsel before you become a board member of any for-profit organization.

If you become a board member for another organization, you should ask about the type of indemnity and insurance it provides for board members. Except when you are a member of another organization's board at UnitedHealth Group's request, UnitedHealth Group will not indemnify

you for anything that occurs as a result of your board membership.

You must not serve on the board of directors of any company that competes with UnitedHealth Group.

(See the Outside Directorships policy)

EMPLOYMENT AND ACTIVITIES OUTSIDE OF UNITEDHEALTH GROUP

You may not provide services to any business that competes with UnitedHealth Group. In addition, UnitedHealth Group employees generally may not accept payment for services they perform for UnitedHealth Group outside of their regular jobs.

A conflict of interest may arise if you are employed outside of UnitedHealth Group and it hinders your work for UnitedHealth Group. You must make sure any outside activities are strictly separate from your duties at UnitedHealth Group. You may not use UnitedHealth Group's time, resources or people for non-UnitedHealth Group employment activities.

FAMILY MEMBERS

A conflict of interest may arise when doing business or competing with companies for which a family member works, or in which your family member has an ownership interest. You should disclose any such relationships to your manager. Your manager will consult with HRdirect, Corporate Employee Relations, the Legal Services Department or the Ethics and Integrity Office to decide the best course of action.

(See the Avoiding Conflicts of Interest policy)

What if...

Q: My sister works for a company that would be a great office supplies vendor for UnitedHealth Group. Can I purchase from her company?

A: You can not personally purchase from a family member or have any direct or indirect influence of any decision to purchase from her. The potential for an appearance of a conflict of interest is too great. However, if you are completely removed from UnitedHealth Group's purchasing decisions in your business area, you may introduce her to the appropriate person within UnitedHealth Group.

INSIDE INFORMATION AND SECURITIES TRADING

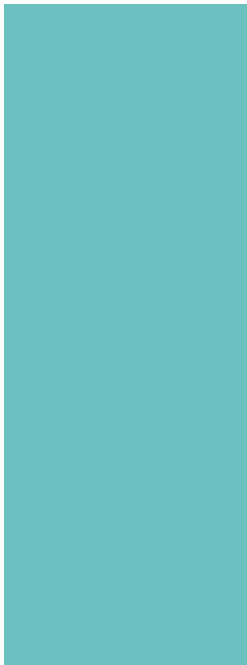
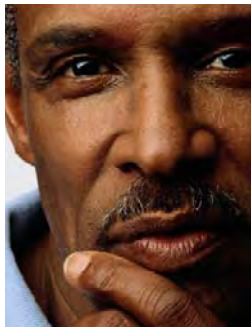
Insider trading is against the law and UnitedHealth Group's Insider Trading policy. You violate the insider trading provisions of the securities laws and company policy if you engage in a securities transaction while possessing

material nonpublic information about that company.

If you possess inside information, you can be held liable under insider trading laws if you give that information to another person and that person engages in a securities transaction based on your information or stock tip.

Also, you should not engage in investment activities that give you a financial interest in poor stock performance by UnitedHealth Group (generally true for "put" options or "short sells").

(See the Insider Trading policy)



What if...

Q: I know that the Insider Trading Policy prohibits employees from trading in UnitedHealth Group stock whenever they possess "material nonpublic information." How do I know if the information I have is "material"?

A: Information should be regarded as material if a reasonable investor would consider the information important when deciding to buy or sell stock. Generally, any information that influences an investor's decision to buy or sell stock should be regarded as material.

When you are thinking about buying or selling UnitedHealth Group securities, you should apply the "reasonable investor" test: "Would a reasonable investor consider this information important in deciding whether to buy or sell?" If the answer is yes, don't trade until the information is public or no longer material.

While it is not possible to define exactly what constitutes "material information," you should be aware that the following types of information may be considered "material":

- Financial results
- News of a pending or proposed acquisition or disposition
- Impending financial problems
- Significant litigation exposure due to actual or threatened litigation
- Significant product defects or modifications
- Changes in dividend policy
- Projections of future earnings or losses
- Gain or loss of a substantial customer or supplier
- New product announcements of a significant nature
- Significant pricing changes
- New equity or debt offerings
- Changes in senior management

INVESTMENTS AND OTHER FINANCIAL OPPORTUNITIES

A financial investment that compromises your independent judgment or work at UnitedHealth Group is a conflict of interest. The term “financial investment” means stock, options to buy stock, or other ownership interests in a company.

UnitedHealth Group’s policy embraces a “rule of reason.” For example, small investments in companies that compete with UnitedHealth Group, or small investments by your spouse in his or her employer (when the company competes with UnitedHealth Group), may not be a problem.

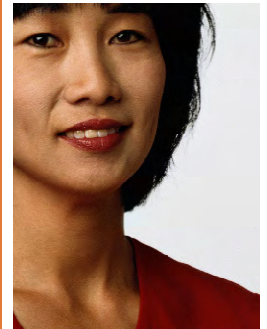
If your investment or your spouse’s investment in a UnitedHealth Group competitor is not small, telling your manager is a key first step. It will ensure your integrity is not questioned and the issue will be resolved to everyone’s satisfaction.

You should not invest in suppliers or companies with whom UnitedHealth Group is contemplating a transaction if you will need to recommend or make decisions about products, services or the merits of a transaction with that supplier or company. Also, you must promptly report any situations where companies/suppliers that you are evaluating or doing business with offer you stock, or include you in an Initial Public Offering.

a situation is a conflict of interest, consult with your manager. Of course, you or your manager may consult the Legal Services Department, the Ethics and Integrity Director or the Ethics & Compliance HelpCenter.

You also may not directly or indirectly buy, lease or acquire rights to any property or materials if you believe UnitedHealth Group also may be interested in the opportunity. You should tell your manager about any business opportunity you become aware of due to your job at UnitedHealth Group.

(See the Avoiding Conflict of Interest policy)



What if...

Q: *My boss has been traveling a lot because UnitedHealth Group is acquiring Acme Health Care, but the acquisition has not yet been made public. I know that when acquisitions are announced, the stock of the company being acquired often increases in value. I want to buy some Acme stock before the acquisition is announced. The Insider Trading Policy only prevents me from trading in UnitedHealth Group stock – right?*

A: No, the Insider Trading policy prohibits employees from trading in the stock of any company – not just UnitedHealth Group stock -- that they have non-public material information about. Knowing about the planned acquisition of Acme by UnitedHealth Group is non-public material information about Acme that prohibits you from purchasing Acme stock.

Government Customers

It is UnitedHealth Group's policy to treat all of our customers, including federal, state and local governments, with the honesty, fairness and quality described in these Principles. We also strive to comply with the procurement laws and regulations put in place to protect the public interest. These laws apply to UnitedHealth Group whether work is done under a primary contract or subcontract.

UnitedHealth Group employees who work with government officials and contracts must know and comply with applicable laws and regulations. Direct questions about the laws and regulations applicable to working with government customers to the Legal Services Department.

(See the Government Contracting policy)

What if...

Q: *My business unit is bidding on a state Medicaid contract. We will be having several meetings with state officials that may extend through the lunch hour. Is it okay to treat them to lunch?*

A: It may not be. We should not do anything that may improperly influence, or appear to improperly influence, the bidding process. To avoid the appearance of a conflict, you should not provide a meal.

EMPLOYEE EDUCATION ABOUT FALSE CLAIMS

UnitedHealth Group policy requires compliance with the requirements of federal and state laws that prohibit the submission of false claims in connection with health care programs, including Medicare and Medicaid. Every UnitedHealth Group employee affiliated with a Business Organization that receives or makes payments of \$5 million or more under a state Medicaid contract, must comply with the following requirements designed to detect and prevent fraud, waste and abuse.

- **Federal False Claims Act:** The federal False Claims Act prohibits knowingly submitting (or causing to be submitted) to the federal government a false or fraudulent claim for payment or approval. It also prohibits knowingly making or using (or causing to be made or used) a false record or statement to secure payment for a false or fraudulent claim paid or approved by a state Medicaid program, the federal government or its agents, such as a carrier or other claims processor.

Civil penalties can be imposed on any person or entity that violates the federal False Claims Act, including monetary penalties of \$5,500 to \$11,000 as well as treble damages for each false claim.

- **Federal Program Fraud Civil Remedies:**

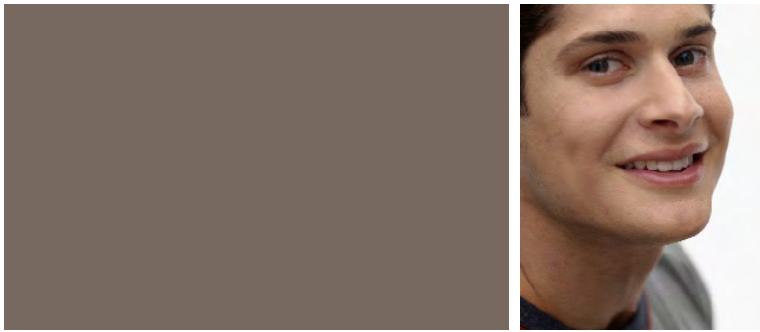
The Federal Program Fraud Civil Remedies Act of 1986 allows the government to impose civil penalties against any person who makes, submits or presents false, fictitious or fraudulent claims or written statements to designated federal agencies, including the U.S. Department of Health and Human Services, which is the federal agency that oversees the Medicare and Medicaid programs.

- **State False Claims Acts:** Several states have enacted broad false claims laws modeled after the federal False Claims Act that impose civil penalties ranging from \$5,500 to \$11,000 for each action, plus treble damages and reimbursement costs of the action. Other states have enacted laws with provisions limiting false claims to health care fraud that impose civil penalties up to \$10,000 per violation, plus three times the amount of excess payment including interest and reimbursement costs of the civil action, and criminal fines up to \$50,000 and possible imprisonment

- **Whistleblower and Whistleblower**

Protections: The federal False Claims Act and some state false claims acts permit private citizens with knowledge of fraud against the U.S. Government or state government to file suit on behalf of the government against the person or business that committed the fraud. The laws also prohibit retaliation against an employee for investigating, filing or participating in a whistleblower action.

(See the Integrity of Claims, Reports and Representations of Government Entities policy).



EMPLOYEES’ RESPONSIBILITIES

UnitedHealth Group corporate policies on Detecting Fraud and Abuse require each UnitedHealth employee to comply with the requirements of these policies. In addition, each employee is required under these policies to report any suspected misconduct, including suspected violations of the Company’s policies or procedures or federal or state laws, as required by UnitedHealth Group’s Reporting Misconduct Policy. UnitedHealth Group employees can make reports of potential improper activities to their supervisor, the Legal Department, the Internal Audit Department or Corporate Security. Anonymous phone calls can be made to a toll-free Ethics & Compliance HelpCenter: 1-800-455-4521.

UnitedHealth Group expressly prohibits retaliation against employees who, in good faith, report or participate in the investigation of compliance concerns, or who, in good faith, investigate, file or participate in a whistleblower action.

MANAGERS RESPONSIBILITIES

UnitedHealth Group managers must inform their employees that UnitedHealth Group does not tolerate or condone activities that result in or contribute to the submission of false claims to any federal health care programs, including Medicare and Medicaid. A UnitedHealth Group manager must take appropriate action if he or she learns about possible fraudulent or abusive activities.

BUSINESS ORGANIZATION RESPONSIBILITIES

UnitedHealth Group’s policy on Detecting Fraud and Abuse requires each Business Organization to establish procedures to detect, investigate eliminate and report fraud and abuse. Each UnitedHealth Group’s Business Organizations’ policies and procedures on detecting and preventing fraud, waste and abuse can be reviewed online on each Business Organization’s website.

UnitedHealth Group Business



Organizations that receive or make payments of \$5 million or more under a state Medicaid contract must coordinate with UnitedHealth Group’s Ethics and Integrity Office to educate and train all of their employees on federal and state false claims acts, the federal Program Fraud Civil Remedies Act of 1986 and whistleblower protections available under these laws.

CORPORATE RESPONSIBILITIES

UnitedHealth Group’s Ethics and Integrity policy on Detecting Fraud and Abuse and each Business Organizations’ policies on Detecting Fraud and Abuse provide specific details regarding internal policies, procedures and individuals’ responsibilities to prevent and detect fraud, waste and abuse. Additionally, UnitedHealth Group’s Ethics and Integrity Program provides for rigorous internal investigations and prompt resolution of alleged violations.

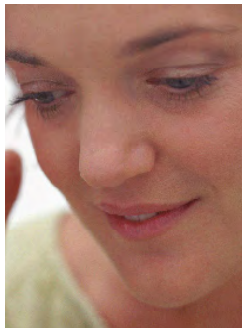
GOVERNMENT INVESTIGATIONS AND INTERVIEWS

UnitedHealth Group and its employees must cooperate fully and promptly with government actions looking into possible civil and criminal violations of the law. It is important, however, that during this process UnitedHealth Group is able to protect the legal rights of the company and its employees. To do so, employees must promptly refer any questions from the government or requests for information, documents or interviews to the Legal Services Department. Employees who take part in government interviews must tell the truth and give complete, clear answers.

In response to government requests for information, the company will provide complete, factual and correct information. Never hide, destroy or change documents, or lie or make misleading statements to government officials or their representatives. Do not try to cause a fellow employee to fail to provide correct information.

UnitedHealth Group will answer government requests for information as required by law. It is important, however, that UnitedHealth Group is able to protect the legal rights of the company and its employees when responding to such requests. As a result, employees must refer all government requests for information to the staff who have been assigned responsibility for regulatory compliance. The compliance staff may respond to routine requests that are within the scope of their job responsibilities. All other requests must be referred to the Legal Services Department.

(See the Government Interviews of Company Employees policy)



Health, Safety & Security

GENERAL HEALTH AND SAFETY

UnitedHealth Group is committed to providing a safe and healthful workplace for all employees and visitors. You can support this commitment by observing all health and safety rules and laws that apply to your job. You also must promptly report accidents, injuries, or occupational illnesses and unsafe practices or conditions to your manager.

(See the Employee Handbook, Safety and Security section, on HRdirect for more details)

VIOLENCE IN THE WORKPLACE

In line with its policy to provide a safe workplace for employees, UnitedHealth Group is committed to maintaining a work environment free from acts or threats of violence. The company will not permit any behavior that puts the safety of its employees, participants, customers, suppliers or others in danger.

Employees may not carry any weapon on the job; onto company work sites; in company vehicles; in personal vehicles while being used for company business; or while attending UnitedHealth Group-sponsored activities. Non-employees, except law enforcement officers and specifically contracted armed security agents, are not allowed to carry a weapon onto UnitedHealth Group property. Threats or acts of violence or physical intimidation are not allowed.

Employees must promptly report all threats, attempted violence, or actual violence against themselves, other employees, customers or third parties in

the UnitedHealth Group workplace to their manager, HRdirect, or Corporate Security at (952)936-1310.

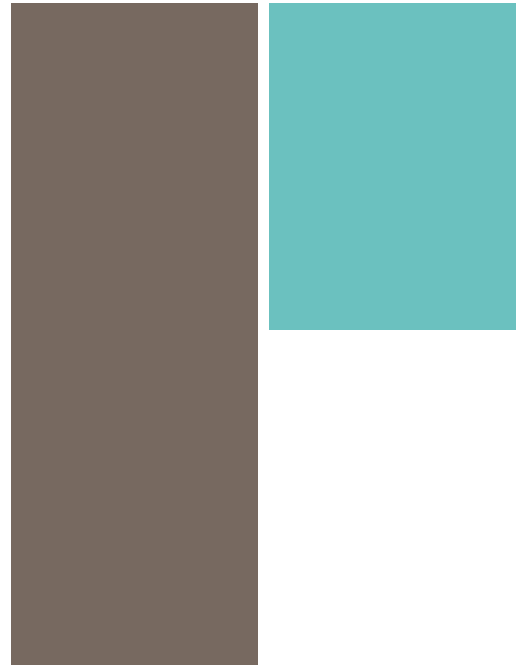
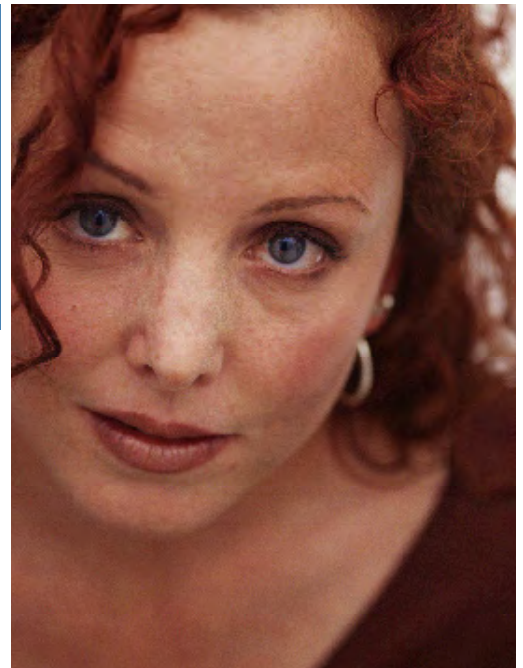
(See the Employee Handbook, Work Conduct section on HRdirect for more details)

DRUGS AND ALCOHOL

To help promote a safe and healthful environment for employees and provide customers and investors with the quality and productivity they demand, UnitedHealth Group requires a drug-free workplace. Employees must not be under the influence of any substance, including alcohol, that could prevent them from working safely and effectively. Using, possessing, distributing, manufacturing, transporting, selling or being under the influence of alcohol or an illegal or illicit drug while on duty, on company work sites, or in company vehicles or in personal vehicles used for company business is not allowed. Employees with alcohol or drug problems are encouraged to contact Optum® or other qualified professionals.

Employees who are using prescription or nonprescription drugs that may impair their alertness or judgment and as a result put their safety or that of their co-workers, participants, or others in danger, must not continue to perform their jobs and must tell their manager.

(See the Employee Handbook, Work Conduct section on HRdirect for more details)



EMPLOYEE RELATIONS

UnitedHealth Group is committed to providing a work environment where each of you is valued and treated with respect. We want to ensure an environment that promotes respect for each other's differences and an understanding of the value of diversity within the organization. Our employment policies also emphasize this commitment by prohibiting any form of discrimination and harassment, as well as violence or threats against an employee, service provider, vendor, consultant, customer, or other constituent.

To help ensure a safe work environment free from discrimination, harassment or threats, you should immediately report any improper conduct to your manager. If your manager is not available or if the conduct involves your manager, you should report the incident to one of the following:

- The next level of management
- HRdirect at 1-800-561-0861
- A Human Capital representative
- Corporate Employee Relations at 952-936-1758
- The Ethics & Compliance HelpCenter at 1-800-455-4521

Complete information regarding UnitedHealth Group's Employee Relations policies and practices is available online:

- From UnitedHealth Group's Intranet, Frontier, select HRdirect, the Knowledge Base, or
- From the internet, go to www.unitedhrdirect.com, then select Knowledge Base.

Once you have logged into the Knowledge base, select Employee Handbook to view Employee Relations policies and practices. If you do not have online access, or if your question is not answered in the Knowledge Base, call HRdirect at 1-800-561-0861 and speak to a representative.

EMPLOYMENT PRIVACY

At UnitedHealth Group, we strive to respect each other's privacy. At the same time, the company needs to maintain an efficient work environment.

While UnitedHealth Group does not routinely monitor personal communications, it reserves the right to do so. Employees should not expect communications in the workplace to be private. UnitedHealth Group reserves the right to review your use of phones, voice mail, the Internet, the Intranet or e-mail for any reason without prior notice. UnitedHealth Group also reserves the right to search employee work spaces, lockers, briefcases, etc. In addition, in order to promote the security of its work place and employees, the company maintains cameras to monitor certain common areas and, on occasion, the company may install surveillance

equipment to investigate specific instances of possible misconduct.

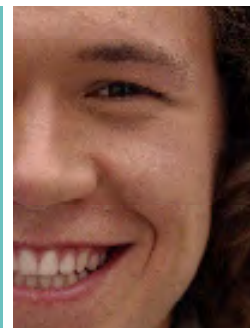
Failure to permit a search or interference with a search may result in disciplinary action up to and including termination.

(See the Employee Handbook, Security & Safety, Information Security Policy on HRdirect, for more details.)

FORMER GOVERNMENT EMPLOYEES

Former U.S. government employees generally are not allowed to represent the company in matters where the government has substantial interest and where the employee had prior responsibility. Retired senior government officials are further restricted from selling to, or in some cases contacting, their former agency. The time frame of these restrictions and what they apply to depend on the type of former government employment. All UnitedHealth Group employees who are former government employees are expected to know and comply with any restrictions on the functions they can perform. Such employees must also notify their managers of any such restrictions.

(See the Employee Handbook, Employment of Governmental Employees on HRdirect, for more details.)



International Business Practices

No matter where they are located around the world, UnitedHealth Group employees must follow these Principles of Ethics and Integrity by complying with all of UnitedHealth Group's policies and local laws.

Some U.S. laws apply to UnitedHealth Group's non-U.S. operations. A number of the key areas where U.S. law applies internationally are outlined below.

ACCOUNTING

UnitedHealth Group's status as a publicly held corporation means the company must conform to generally accepted accounting principles in all operations worldwide. All payments, transactions and accounts worldwide must be correctly and truthfully recorded and reported.

(See the Accurate Books and Records Policy and Procedures)

ANTI-BOYCOTT

UnitedHealth Group employees and agents by law may not cooperate in any way with an unsanctioned foreign boycott of countries friendly to the United States. Promptly send any request for information or action that seems to relate to any illegal boycott to the Legal Services Department.

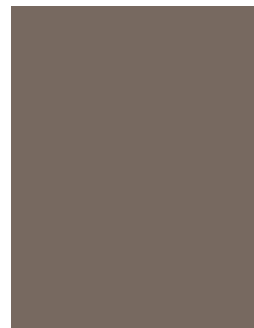
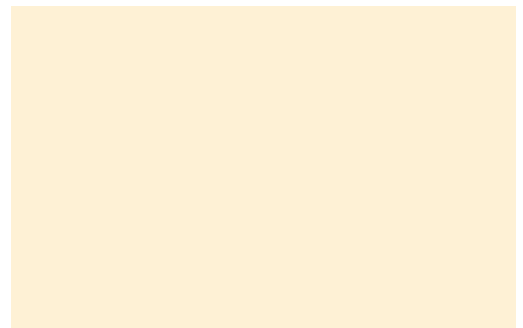
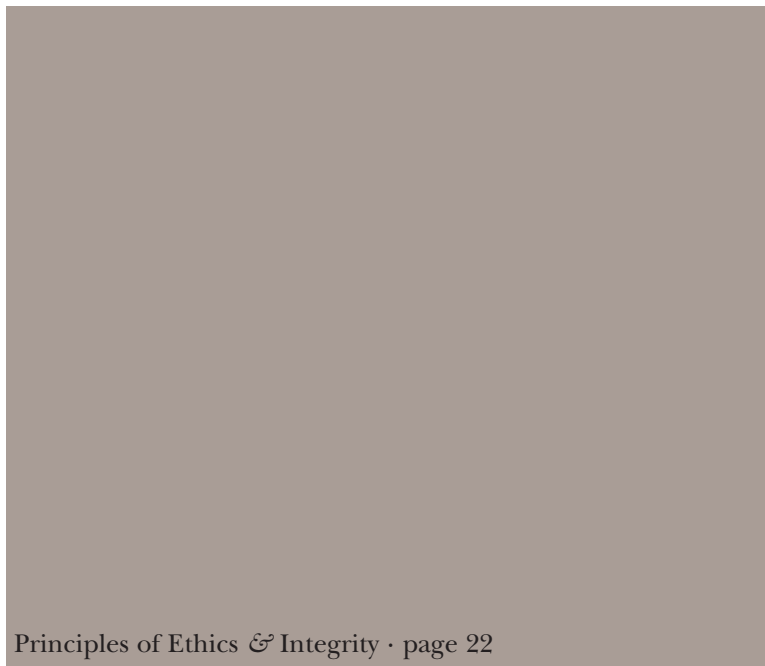
EXPORT CONTROL

Several U.S. laws restrict trade with certain countries. Other laws restrict exports of certain technologies, especially in the areas of encryption and advanced computing devices. UnitedHealth Group must comply with U.S. export restrictions. Employees and agents who are not sure of the legal trade status of any country or technology must contact the Legal Services Department.

FOREIGN CORRUPT PRACTICES ACT

The Foreign Corrupt Practices Act (FCPA) states that companies, including UnitedHealth Group, must not offer, promise to pay, or approve the payment of money or anything of value to foreign government officials or their representatives, parties or candidates to influence the acts or decisions of foreign officials. Certain minor payments to foreign government officials made to speed up or secure the performance of "routine governmental action" may not violate the law. Always consult with the Legal Services Department before making or approving any such payment.

(See the Foreign Corrupt Practices Act Compliance Policy and Procedures)



Media and Analyst Contact and Communication

UnitedHealth Group's reputation comes, in part, from the relationships it maintains with the news media. For this reason, it is critical that we present information to the news media in a clear, accurate, positive and professional manner.

As a publicly traded company, it is important for UnitedHealth Group employees to know the securities law fair disclosure requirements. The following is information that cannot be discussed unless specific exceptions have been approved by UnitedHealth Group's general counsel, Capital Markets Communications and Strategy, and your business unit's communications department:

- Estimated revenues or earnings
- Business statistics, other than those already published in the earnings reports, UnitedHealth Group's annual report, filings with the Securities and Exchange Commission, or issued in news releases
- Unannounced products and services
- Senior executive hires or changes
- Acquisition or divestiture plans
- Positions on pending regulatory changes, lawsuits or investigations

APPROVALS

All news to be sent to local, regional or trade media must be reviewed and approved by the appropriate business leader, public relations department, subject matter experts, and assigned legal counsel before it is released.

News for the national news media or to be sent over a news wire service also must be reviewed and approved by UnitedHealth Group's Office of the Chairman, and the Office of the General Counsel.

MEDIA INQUIRIES

Contact with the news media should be coordinated with the public relations specialist for your business or an approved public relations agency. This will make sure the reporter talks to a key subject matter expert and receives the most current information.

ANALYST INQUIRIES

All contact with investors or analysts must be coordinated through the Director of Capital Markets Communications and Strategy, (952)936-7214.

ACTING AS A SPOKESPERSON

Employees who are experts in a certain area or who are company leaders may be asked to act as a media spokesperson. The Public Relations staff will select and train employees for this role. All spokespersons must coordinate their media contacts with their assigned Public Relations staff.

(See the Disclosure of Information to the Public, the Media and Analysts and the Crises Communications policies)



Participant Information

DISCLOSURE OF INFORMATION

At UnitedHealth Group, we collect information about the medical conditions and treatment of our participants. We know this is sensitive information and are determined to keep it confidential. We do not give out or talk about participant-specific information with others unless we have the participant's consent, it is necessary to serve the participant, it is allowed or required by law or it is determined appropriate to protect the participant or others.

UnitedHealth Group employees must never disclose confidential information that violates the privacy rights of participants. Employees must not view any participant information other than what they need to do their job.

(See the Information and Privacy Practices policy)

USE OF INFORMATION

Generally UnitedHealth Group has acquired participant information for limited purposes of providing or administering its health and well-being products. In some cases, UnitedHealth Group is allowed to use the information for other purposes, such as research and analysis. UnitedHealth Group will use participant information only for the reasons it was received or as the participant or law allows.

(See the Information and Privacy Practices policy)

Political and Community Activities

COMMUNITY ACTIVITIES

UnitedHealth Group contributes to the economic and social development of the communities where it does business. In addition to creating jobs and providing services, the company encourages employees to be active in their communities.

If you take part in community activities not sponsored by UnitedHealth Group, you must make it clear that your views and actions are your own and not those of the company. Also, your activities outside the workplace should not interfere with your work at UnitedHealth Group.

If you wish to use company time or property to support charitable, nonpolitical efforts, you must first obtain your manager's approval.

POLITICAL ACTIVITIES

No employee may contribute on behalf of UnitedHealth Group or use UnitedHealth Group's name, funds, people, property or services to support political parties or candidates unless allowed by law and approved in advance by UnitedHealth Group's general counsel.

If you take part in political activities or committees, you must make it clear that your views and actions are your own and not those of the company, unless the

company has requested and approved your participation. If you take part in any political committee, even for personal reasons, you should notify the Vice President of Federal Affairs, Elise Gemeinhardt, (202)371-1303, of your involvement so appropriate coordination of political activities can occur. Your activities outside the workplace should not interfere with your work for UnitedHealth Group.

You must not pressure a fellow employee to express a political view that goes against his or her personal view. You also must not pressure a fellow employee to contribute to a political action committee (PAC), political party or candidate, or charity.

U.S. law and the laws of many state and local governments forbid companies from contributing money, goods or services to political candidates, except for administrative support of a company's PAC. The PAC receives voluntary contributions from employees that are then contributed to political parties and candidates. The PAC does not contribute company funds to political parties or candidates.

Outside the United States, UnitedHealth Group will honor local laws and applicable U.S. laws, including the Foreign Corrupt Practices Act.

(See the Employee Handbook, Work Conduct section on HRdirect for more details.)

Procurement Practices

UnitedHealth Group believes in doing business with suppliers, contractors, agents, sales representatives, and consultants who have ethical business practices. The company will not knowingly use suppliers who violate applicable laws or regulations, including environmental, employment or safety laws.

Obtaining the best overall value for UnitedHealth Group should be the basis for procurement decisions. Employees should be utilizing UnitedHealth Group's centrally leveraged contracts and processes for their routine purchases. In the event you need to acquire a non-standard service or good, contact the appropriate Procurement department for assistance.

Office Connection on the front page of Frontier can answer many frequently asked questions about procurement and suppliers.

UnitedHealth Group has a Supplier Authorization Request process. All requests for new suppliers will be reviewed by Procurement. Not all requests are approved. Do not commit or enter into any agreements on behalf of the company unless you have fiscal and signatory approval to do so and your request has been approved in advance by Procurement.

Personal, family and financial relationships may make it difficult to

make objective decisions. If you have a personal or family relationship with, or own an interest in a supplier or potential supplier, you must tell management of the relationship. You must also take steps to make sure decisions affecting these companies are based solely on objective input and judgment. See the Conflicts of Interest section of these Principles for additional guidance regarding these types of situations.



Provider Relationships

Many of UnitedHealth Group's business units rely upon and/or maintain a variety of relationships with physicians and other health care providers. These relationships are essential to UnitedHealth Group's business and success. Many of the business units enter into contracts with certain physicians and other health care providers to render services to participants. The business units may also arrange for non-contracted physicians and other health care providers to be paid for services provided to participants.

All contractual arrangements with physicians and other health care providers must be in writing and in

accordance with the Legal Services Department's policies. And, all business relationships with a physician or other health care provider must comply with applicable legal requirements and any established company standards. Specifically, contractors for services under a state Medicaid contract must agree in writing to comply with the requirements of the federal False Claims Act, any applicable state false claims acts, and the Program Fraud Civil Remedies Act of 1986. If an employee is not sure what legal requirements or company standards may apply, the employee should consult his or her manager or contact the Legal Services Department.

Regulatory Compliance and Accreditation Organizations

REGULATORY COMPLIANCE

UnitedHealth Group provides a variety of health care related services and coverage products in many states and countries. These products and services must be provided according to applicable federal, state and local laws. The company is subject to many other laws in addition to health care coverage regulations.

It is UnitedHealth Group's goal to provide its employees with the information and education they need to fully understand and comply with all relevant laws and regulations. Employees should promptly report violations or suspected violations of applicable laws to a manager, a member of management,

the Legal Services Department, or the Ethics & Compliance HelpCenter by phone at 1-800-455-4521 or online at [Frontier > Corporate Services > Ethics and Integrity > Ethics & Compliance HelpCenter](#).

(See the Government Interviews of UnitedHealth Group Employees policy)

Sales & Marketing

One of UnitedHealth Group's goals is to satisfy its customers with high-quality products and services at competitive prices. We must treat customers with honesty, integrity, fairness and respect at all times, and we must make promises only when we are reasonably sure we can keep them.

In our highly competitive marketplace, UnitedHealth Group can create a competitive advantage by correctly representing products, services, benefits and prices. If we make promises we can't keep, hard-earned customer trust is lost. We also must not create misleading impressions, omit important facts, or make false claims about our competitors' offerings.

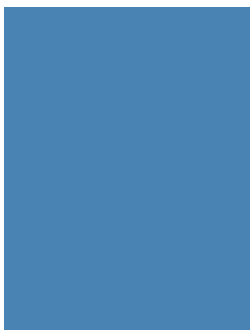
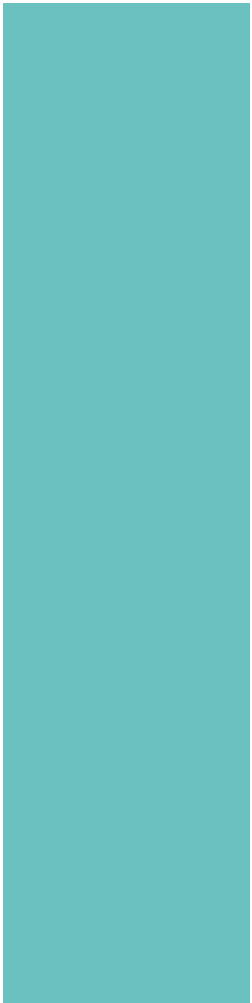
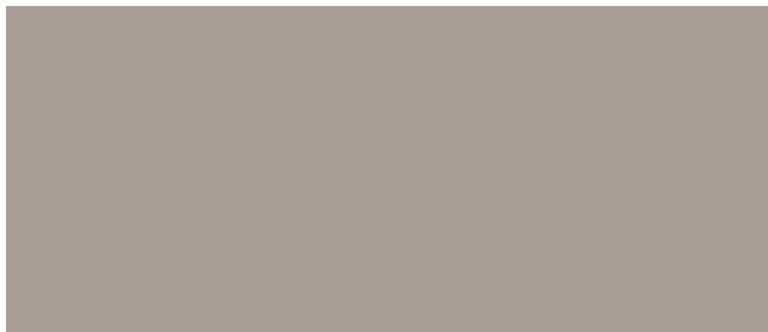
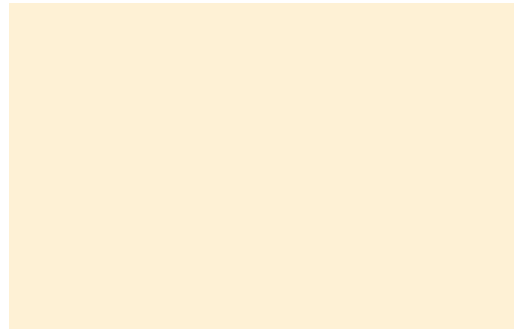
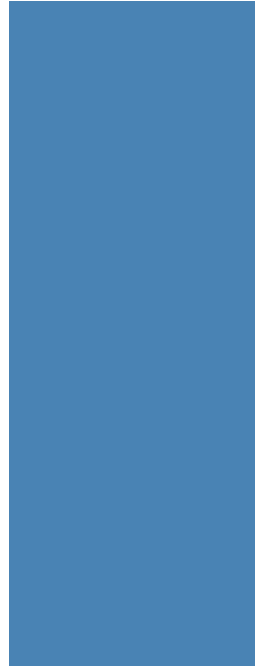
While UnitedHealth Group needs to aggressively market and advertise its products and services, we must do so while following "truth in advertising" laws. You must never use illegal or unethical activities to obtain business, including offering bribes or kickbacks.

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What if...

Q: *I work in sales and am always up against competitors who make a lot of promises that they don't fulfill. I feel pressured to do the same in order to get the business. This is all part of the sales game – right?*

A: Business is not a game – it involves real commitments and impacts real people. UnitedHealth Group is successful because of long-term customers who are satisfied with UnitedHealth Group's products and services. We will continue to build a better company because we deliver what we promise – not because of a deceptive sale that later can not be fulfilled.





UnitedHealth Group®

