

CENTENE CORPORATION FEDERAL LOBBYING ACTIVITIES POLICY

Scope

This policy applies to employees of Centene Corporation, its affiliates and Health Plans (collectively, the “Corporation”).

Purpose

The purpose is to provide guidance to the Corporation to ensure compliance with federal ethics and lobbying laws.

Policy

It is the Corporation’s policy that all employee contact and interaction with federal Congressional and Executive branch officials and their staffs be pursued in accordance with federal laws and regulations. Corporation employees are responsible to be familiar with federal lobbying laws and regulations. Employees are required to complete corporate-sponsored training to become familiar with provisions of the Honest Leadership and Open Government Act of 2007 (“HLOGA”), which became effective January 1, 2008.

HLOGA made important changes to the Congressional Ethics Laws, Federal Election Laws, and Lobbying Disclosure Act (“LDA”). See **Appendix A** for a summary of the provisions of HLOGA.

As a lobbyist employer, Centene is prohibited from providing anything of value to Members of Congress and Congressional staff unless the gift falls into one of the exceptions. No employee may provide anything of value to Members of Congress or Congressional staff without prior approval from Centene’s Government Relations Office. The same approval process applies before gifts may be provided to political appointees in the Executive Branch of the federal government as well as to career civil servants in the United States Government.

Procedure

Lobbying Disclosure Reports

- Federal law requires the Corporation to file quarterly lobbying disclosure reports that include a good-faith estimate of its lobbying expenses for each quarterly reporting period. As part of this estimate, the Corporation must account for the cost of any staff time spent on “lobbying activities.” See **Definitions** section for definition of the terms *lobbyist*, *lobbying activities*, and *lobbying contact*.
- The Corporation must also file a semiannual report which includes a certification that its employees did not knowingly provide a gift in violation of House or Senate gift or travel rules.

The Corporation’s Government Relations Department in Washington, D.C. will prepare the required reports.

If you engage in any federal lobbying activities please **notify the Government Relations Department** so the costs of your lobbying activities can be included in the Corporation's quarterly disclosure reports.

Definitions

A lobbyist is any person who provides services that include: 1) Making more than one "lobbying contact" with Members of Congress, Congressional staff members or Executive branch political appointees on behalf of a particular client or employer, and 2) Spending 20 percent or more of his or her compensated time on "lobbying activities" for that client over a three-month period of time.

Lobbying activities include any lobbying contacts as defined above. *Any activities in support of lobbying contacts and any work intended to support ongoing or future lobbying also constitutes lobbying activity.*

A lobbying contact can be a written, oral (in-person or by phone), or electronic communication to a Covered Congressional or Executive branch official (e.g., Members of Congress, Congressional staff, political appointees in the Executive Branch) with regard to legislation, nominations, rules, regulations, or a policy, program or position of the Federal Government. There are exceptions for certain activities such as testimony, submissions on the record in rulemakings and other proceedings, and communications compelled by contract.

Appendix A

Summary of Provisions of the Honest Leadership and Open Government Act of 2007 (HLOGA)

House and Senate Members and Congressional staff are prohibited from accepting gifts of any value from a federal lobbyist, a registered foreign agent, or from any private entity, that retains or employs federal lobbyists or foreign agents, unless an exception to the gift ban applies.

For entities that retain or employ federal lobbyists or foreign agents, which includes Centene Corporation, the total gift ban applies to every person employed by the entity, not just to registered lobbyists or foreign agents.

Entities that retain or employ federal lobbyists must certify that their employees are familiar with the House and Senate gift and travel rules and have not knowingly violated them.

LDA Certification Requirements

The individual signing the certification on behalf of an organization should be knowledgeable of and responsible for the accuracy of the information contained in the filing on behalf of the organization.

Because the individual completing the certification must verify that all employees of the organization are familiar with the Congressional gift and travel rules and have not knowingly violated these rules, Centene conducts mandatory training sessions on the LDA requirements.

The LDA certification requirements create a criminal penalty of up to five years in prison (and/or criminal or civil fines) for the knowing and willful failure to register or file disclosure reports.