

**CENTENE CORPORATION**  
**POLITICAL CONTRIBUTIONS POLICY**  
**February 4, 2019**

**Overview**

Since its founding as a single local healthcare plan in 1984, the Company's mission to provide better health outcomes at lower costs has been linked to the health of the communities we serve. Our Company's purpose is to transform the health of the community, one person at a time. Public policy affects our ability to fulfill our mission and purpose, meet customer needs and provide shareholder value. The Company has engaged and will continue to engage in public policy activities, including political contributions that have the potential to improve the delivery of health care and affect our business, employees and communities in which we operate. The Company's Board of Directors has adopted this Political Contributions Policy (this "Policy") to ensure that any such contributions are made in a manner consistent with the Company's mission and purpose and the interests of its shareholders. References to the "Company" are to Centene Corporation and its majority-owned subsidiaries.

A. Federal Level

Federal election laws limit the Company's ability to provide monetary or in-kind contributions to federal candidates, political parties, political committees, or any other entity in a federal election. The Company expects all employees to comply with federal election laws. Political contributions to federal candidates, political parties, and political committees are, however, lawfully made by one or more bipartisan political action committees ("PACs") sponsored by the Company. Company-sponsored PACs are voluntarily funded with employees' personal money only. Only eligible employees are asked to consider supporting any Company-sponsored PAC. The Company does not pressure or coerce employees to make personal political expenditures or take any retaliatory action against employees who do not.

B. State/Local Level and Other Political Organizations

Some state and local jurisdictions permit companies to contribute to state and local candidates, political parties, political committees, referenda and ballot initiatives. Political contributions at the state and local level may be made directly by the Company or by PACs organized by the Company under state election law. Any PAC established in a particular jurisdiction shall be funded in accordance with applicable state law. In addition, under certain circumstances, the Company or its PACs may contribute to other political organizations and make other political expenditures permitted by law. Generally, the Company contributes to those candidates or initiatives that are consistent with its long-term legislative and regulatory goals, and to those who represent the communities it serves.

**Scope**

This Policy applies to political contributions made by the Company and its PACs. A "political contribution" is any gift, loan, advance or deposit of money or anything of value, made for the purpose of influencing any election for federal, country, state or local office or a ballot initiative, or to pay debt incurred in connection with any such election or ballot initiative. Political contributions may also include indirect support, such as hosting a reception or paying expenses associated with the event.

## **Oversight**

The Government and Regulatory Affairs Committee (the “Committee”) of the Board of Directors monitors compliance with this Policy. Management will report at least annually to the Committee regarding political contributions made by the Company and its PACs pursuant to this Policy, including the purpose and benefit of the political contributions.

## **Policies and Procedures**

All political contributions made by the Company and/or its PACs must: (i) comply with all applicable laws and regulations in the jurisdictions in which the contributions are made (including the United States Foreign Corrupt Practices Act); and (ii) adhere to this Policy and the Centene Corporation Business Ethics and Code of Conduct. Any political contribution made by the Company must be approved in advance by the Company’s office of the Senior Vice President for Government Relations which office is responsible for ensuring compliance with law as well as coordinating input and advice from those with knowledge of the communities in which the Company operates. Additionally, for each contribution, the Company will require review and written approval by the Company’s Chief Executive Officer (or, when warranted in his absence, by the Chief Financial Officer or Chief Legal Officer). Any political contribution by a PAC must be approved by the board of directors of such PAC. The Committee may, by resolution, establish an annual aggregate spending limit for political contributions made by the Company.

All political contributions must reflect the Company’s interests and not those of its individual officers or directors. No contribution will be given in anticipation of, in recognition of, or in return for an official act.

Neither the Company nor any PAC will reimburse employees in any way for personal political contributions. Furthermore, neither the Company nor any PAC will pressure or coerce employees to make personal political contributions, favor those employees who do make personal political contributions, or take retaliatory action against employees who do not make political contributions.

## **Disclosure**

The Company and all PACs will adhere to all laws and regulations regarding the disclosure of contributions for their respective political activities and contributions.