

**CENTENE CORPORATION**  
**POLITICAL CONTRIBUTIONS POLICY**

**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 communities we serve, one person at a time. Public policy affects our ability to fulfill our mission and purpose, meet customer needs and provide stockholder 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 (the "Board") 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 stockholders. References to the "Company" are to Centene Corporation and its consolidated subsidiaries.

**Political Action Committees and Contributions**

**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.

Each of the Company's PACs is governed by a three or more member Board of Directors. These board members represent the various business units of Centene and serve at least a two-year term. Candidates for the Board are nominated by plan presidents, division management, fellow employees or by self-nomination. The PAC Chairperson makes the final appointment. Board members must be members of the PAC and have an interest in politics. Responsibilities of the Board include the following: 1) general oversight to the PAC budget, 2) fund allocations to state committees, 3) approval of political candidate and committee contributions and 4) audit reviews. Board meetings are held two to three times per year via conference call, videoconference or face-to-face meeting.

Candidates must meet the following contribution criteria to be eligible to receive a donation from the PAC: they (1) conduct themselves in an honorable and ethical manner, (2) demonstrate strong leadership skills, (3) exhibit an understanding of health care issues, hold a caucus leadership position and/or serve on a legislative committee with jurisdiction over health

care issues, (4) support the broad legislative goals of Centene and its employees and are willing to hear a sensible business point of view, and (5) represent a district where Centene does business or serves a significant member population.

The PAC may choose to make a contribution to other political action committees in order to advance the PAC's purpose. Examples of these contributions include supporting a coalition of diverse groups who have come together to advocate for a specific issue of interest to the PAC. The PAC may also make contributions to state and national health plan association PACs. Contributions may also be made directly to political party committees.

## **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, county, 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 Board's Governance Committee (the "Committee") monitors compliance with this Policy. Management will report at least semiannually 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. The Company's Office of the Executive Vice President for External Affairs is responsible for ensuring compliance with applicable federal, state and local elections laws, coordinating input and advice from those with knowledge of the communities in which the Company operates and aligning our activities with Centene's business purpose.

## **Policies and Procedures**

### **A. General**

All political contributions made by the Company and/or its PACs, regardless of the source of the funds, 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.

### **B. Approval Procedures**

1. Contributions by the Company. Any political contribution made by the Company must be approved in advance in writing by the Company's Executive Vice President for External Affairs..

2. Contributions by any Company PAC. Any political contribution by a PAC must be approved by the Board of such PAC. The PAC political contribution budget is prepared at the beginning of the 2-year election cycle. The PAC's Board reviews and allocates receipts for contributions accordingly.

### **C. Interests**

All political contributions must reflect the Company's interests and not those of its individual directors, executive officers or employees.

### **D. Other**

No contribution will be given in anticipation of, in recognition of, or in return for an official act.

Funding for political contributions made by the Company must originate from interest-generated income. An annual budget to determine funding for political contributions is included as part of the annual operating plan that is approved by the Board of Directors the Company.

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.

Additionally, the Company's Internal Audit Department shall periodically review the operations of any Company-sponsored PAC.

## **Disclosure and Reports**

### **A. Required Disclosures**

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

**B. Political Activity Reports**

In the interest of transparency and to improve access to information about the Company's political contributions, the Company will prepare and semiannually update a Political Activity Report, which shall be reviewed by the Governance Committee and posted on the Company's website.

*Initially approved by the Board of Directors: October 27, 2020*

*Revised by the Board of Directors: December 8, 2023*