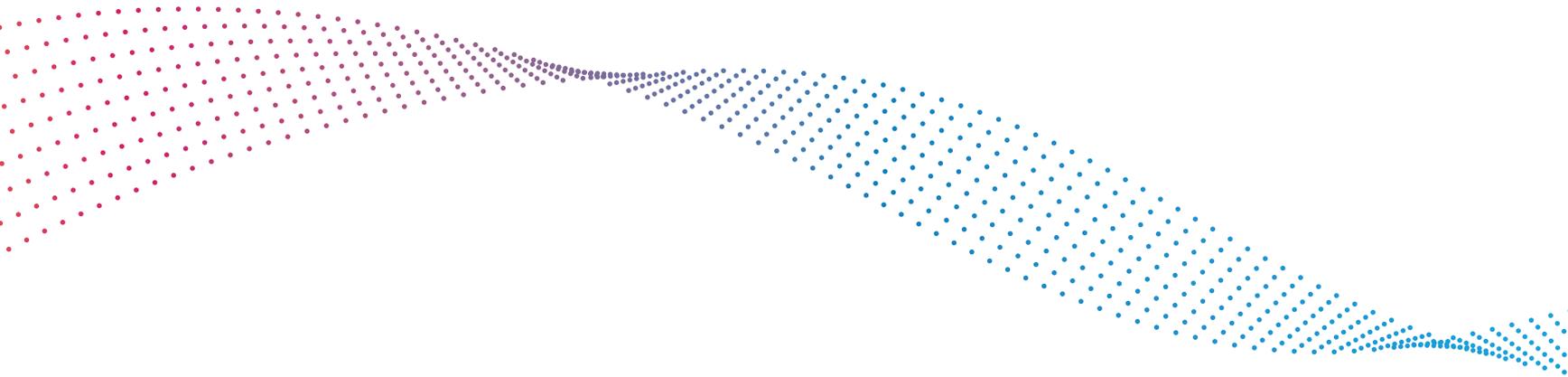




Business Ethics and Conduct Policy

A GUIDE TO CONDUCT IN THE WORKPLACE

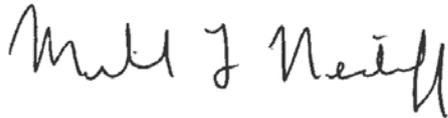


Dear Employee,

Since its foundation in 1984, Centene has built an honorable reputation and an exceptional culture through the hard work and integrity of its employees. We have achieved our significant growth and success by upholding this reputation and acting with the highest values and principles. We will continue to succeed if we all work to understand the values contained in this Code of Conduct and direct our individual behavior by them.

This guide was established to shape, illustrate and defend the values that each employee is expected to respectfully uphold. The purpose of this guide is to help you choose wisely when you represent Centene and its subsidiaries to others, as well as when dealing with your fellow workers. Every decision you make, every action you take, can affect employee morale, the perception of our company and the sustainable results we achieve.

Each of us are integral to the company's reputation, and Centene holds employees accountable to always take personal responsibility to choose what is right. Our company's success depends on a reputation for integrity and high ethical standards in everything we do. Thank you for reading and understanding and adhering to the code of conduct contained within this guide.

A handwritten signature in black ink, appearing to read "Michael F. Neidorff". The signature is written in a cursive, flowing style.

Michael F. Neidorff
Chairman and Chief Executive Officer

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Ethics & Compliance Helpline

To report suspected violations of the code or seek advice regarding a specific situation call:

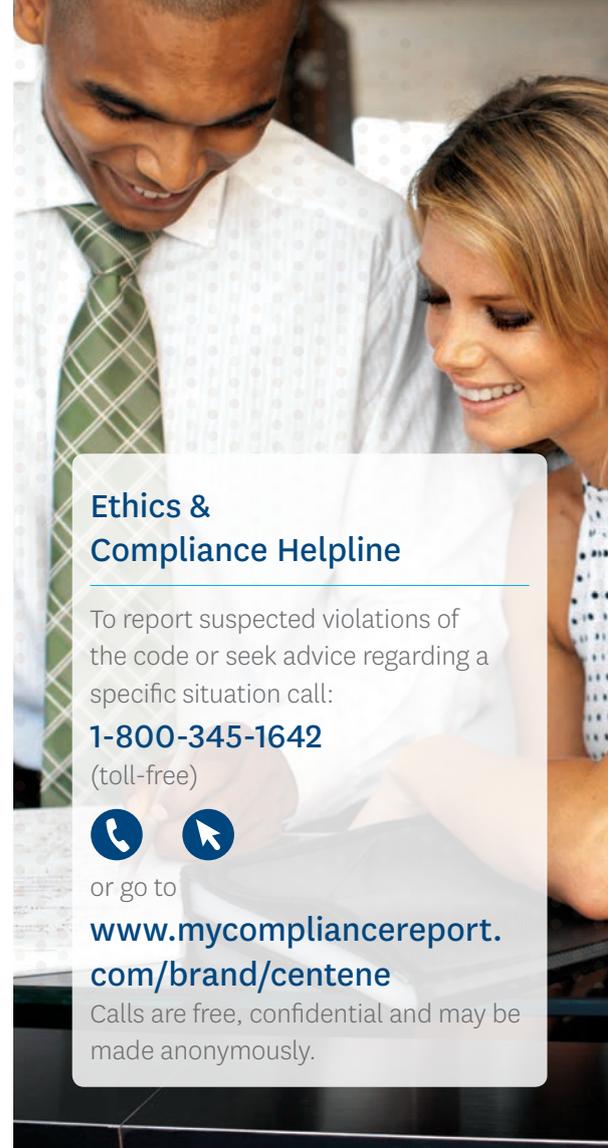
1-800-345-1642
(toll-free)

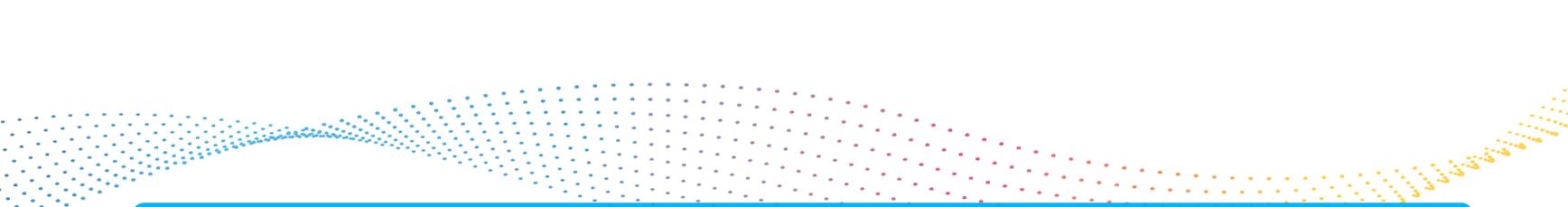


or go to

www.mycomplianceport.com/brand/centene

Calls are free, confidential and may be made anonymously.





Centene Corporation relies on its “A Solid Commitment” Ethics and Compliance program to guide employees when conducting the business affairs of the organization. The program incorporates the Company’s mission, values, and philosophy. These three areas shape our organizational culture which, in the long run, influences performance.

About the Code of Conduct

The Ethics & Compliance Program

MISSION

Centene will provide better health outcomes at lower costs.

VALUES

At Centene Corporation, five core values act as the foundation of our business conduct and daily operations:

- › *Uncompromising Integrity*
- › *Collaborative Leadership*
- › *Entrepreneurial Spirit*
- › *Candid Communication*
- › *Purposeful Innovation*
- › *Disciplined Growth*

PHILOSOPHY

At Centene Corporation, our values are embodied in the 10 principles of our philosophy. These principles incorporate the pride Centene employees take in conducting business with the highest degrees of integrity, which will allow us to:

- › *Do what we say*
- › *Do it fairly and with respect*
- › *Execute with discipline, speed and follow-through*
- › *Challenge the status quo and take prudent risks*
- › *Collaborate and work as a team*
- › *Take accountability for our actions*
- › *Make tough decisions*
- › *Be flexible and performance driven*
- › *Embody an innovative and entrepreneurial spirit*
- › *Empower our employees*

About the Code of Conduct

Policy Statement

The following Policy statement has been approved by the Board of Directors of Centene Corporation. It is applicable to all persons employed by Centene Corporation and each of its subsidiaries (hereinafter referred to collectively as the “Company”), wherever they are located.

It is the policy of the Company to conduct its business affairs in accordance with the standards and rules of ethical business conduct and to abide by applicable laws, both in letter and spirit. In this, there is no room for compromise.

It is imperative that all directors, officers and employees of Centene Corporation comply with the standards contained in the Code, immediately report any alleged violations and assist in investigating any allegations of wrongdoing. It is the policy of the Company to prevent the occurrence of unethical or unlawful behavior, to halt such behavior as soon as reasonably possible after its discovery and to discipline directors, officers or employees who violate the standards contained in the Code. This includes any individuals who fail to report a known violation.

No Policy can be complete in all respects. In the final analysis, the best safeguard against illegal or unethical conduct is for each of us:

- › *to have an understanding of the laws, policies and code of ethics affecting our activities on behalf of the Company,*
- › *to be thoughtful in exercising reason and good judgment in their application to our day-to-day activities,*
- › *to seek an explanation and assistance if any question arises with respect to their application to any situation,*
- › *to always do the right thing.*



Centene Corporation instituted its Compliance Program to educate directors, officers and employees and sensitize them to potential ethical and legal issues. The Compliance Program's procedures, including methods of reporting concerns to the Corporate Compliance Officer, are set out in the written description of the Ethics and Compliance Program, which can be obtained from the Corporate Compliance Officer, Ethics & Compliance Department, or the Human Resources Department.

All employees, as a condition of their employment, will be asked to complete and sign the questionnaires attached to this Policy when hired. In addition, directors, officers, and employees will be required to review and complete the Certificate of Compliance with this Policy and a Conflict of Interest Disclosure annually.



A SOLID COMMITMENT

General Policy

It is our general policy that through its employees, the Company will be transparent at all times and transact business in full compliance with the law and in accordance with the highest principles of business ethics and conduct.

Scope

This Policy applies to all employees and Company-related transactions. All of us need to be familiar with and apply this Policy. Individuals who have supervisory responsibilities must ensure that employees under their direction or control are acquainted with applicable portions of the Policy. Furthermore, our interests are not served by any unethical practice or activity, even though it may not be in technical violation of the law. Therefore, in addition to compliance with applicable legal requirements, each of us must adhere to ethical and professional principles when conducting business on behalf of the Company.

Effect of Violations

Individuals who violate this policy may be subject to disciplinary action up to and including termination. In addition, the employee or former employee may be the subject of civil liability and possible criminal prosecution under applicable law. Furthermore, any employee who authorizes or knowingly permits another employee to engage in a violation of this Policy may also be subject to disciplinary action, dismissal and other penalties.

Employee Rights & Responsibilities

Every employee is obliged to strictly adhere to this Policy at all times and under all circumstances. Any employee who is aware of violations or potential violations has a duty to immediately advise his or her supervisor, the Corporate Compliance Officer, an officer of the Company or a member of the Board of Directors Audit Committee. If an employee has any uncertainty regarding legal or ethical issues involving Company affairs, the employee should seek advice or clarification from the Corporate Compliance Officer, General Counsel, the Human Resource Department or the Chairman and CEO at the headquarters of Centene Corporation in St. Louis, Missouri, telephone number: 314-725-4477. The failure to seek advice or report Policy

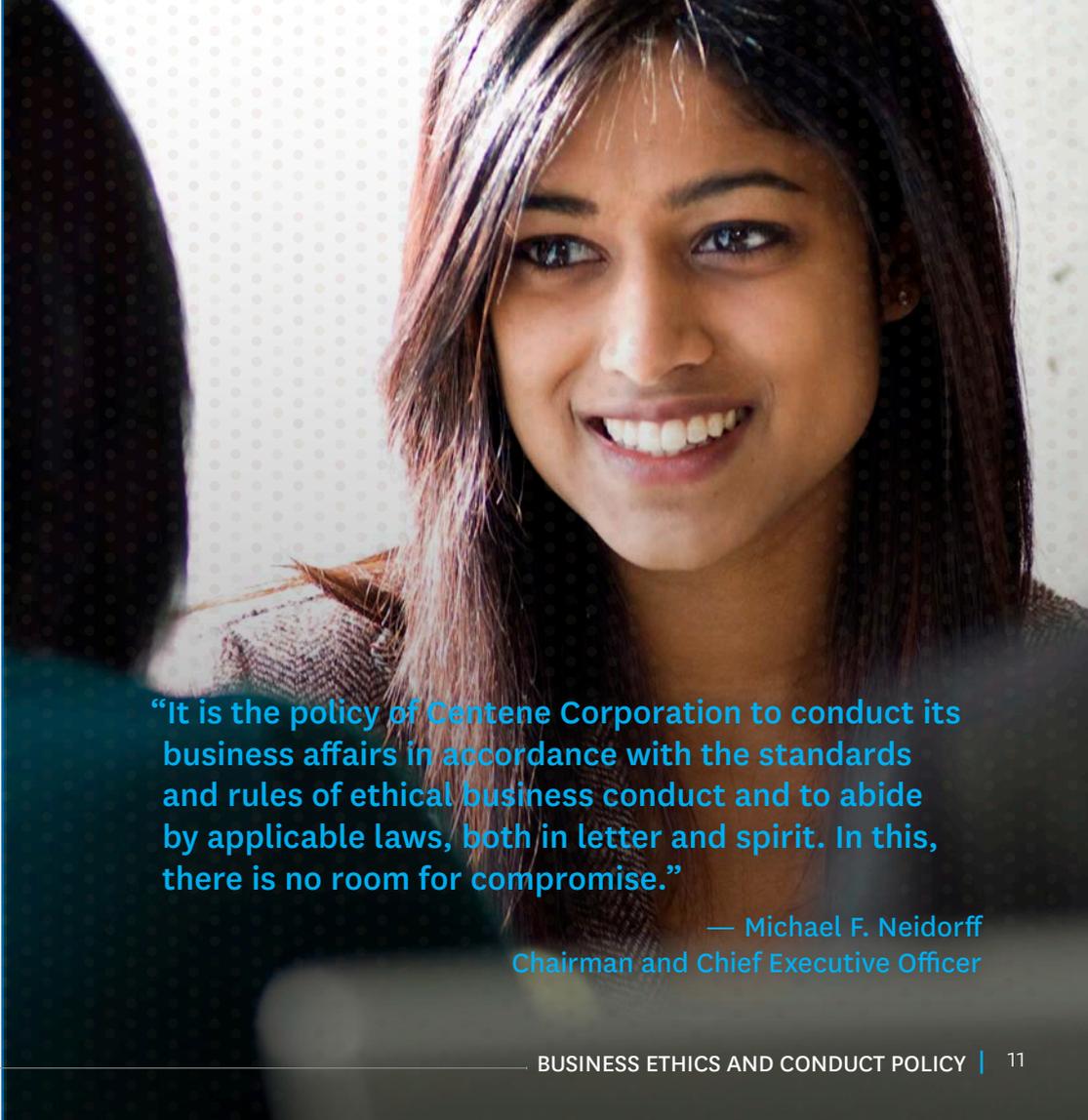
violations could be detrimental to the individual and to the Company. Each employee should be aware that legal implications arising from any act, written record, correspondence or other document created or maintained by an employee may be subject to future scrutiny by government officials or third parties.

It is the right of every employee to report to, make an inquiry of, or ask the advice of their supervisor, manager, or officer of the Company up to and including members of the Board of Directors Audit Committee, regarding any possible violation of this Policy, without risk to the employee's job status or position. To secure this right, each person to whom a report is made or from whom advice

is sought shall use every reasonable means available to keep confidential the identity of any employee who requests such protection. In the judgment of the Corporate Compliance Officer or other members of the senior team, confidentiality may be waived for several reasons such as if the initial investigation substantiates the charge and an extensive internal or governmental investigation, or disciplinary action against the perpetrator(s) is initiated, or if disclosure is required by law.

Ethics

It is the long-standing policy of the Company to observe all applicable laws. This commitment does not stop here. Even where the law is permissive, the Company shall choose the course of the highest integrity. Local customs and traditions differ from place to place. Honesty and integrity, however, are not subject to criticism in any culture. Shades of dishonesty simply invite demoralizing and reprehensible judgments. A well-founded reputation for scrupulous dealings is an invaluable asset. All directors, officers and employees must understand that at Centene Corporation, we care how results are obtained, not just that they are obtained. Each director, officer and employee must be honest and forthcoming about any questionable situation.



“It is the policy of Centene Corporation to conduct its business affairs in accordance with the standards and rules of ethical business conduct and to abide by applicable laws, both in letter and spirit. In this, there is no room for compromise.”

— Michael F. Neidorff
Chairman and Chief Executive Officer

Antitrust & Competition

Competition: Bringing Out the Best in a Company

Competition is valuable because it brings out the best in a person, a company or an industry. Even when we are competing, we hold ourselves to the highest standard of uncompromising integrity.

Antitrust law is extremely complex and covers a broad range of conduct that may be illegal. In general, antitrust law prohibits making agreements or sharing information with competitors regarding:

- › *Purchasing costs or terms*
- › *Selling/leasing prices or pricing policies*
- › *Competitive bids or quotes*
- › *Terms or conditions of sale*
- › *Credit information*
- › *Customers or account data*
- › *Territorial markets or market shares*
- › *Marketing strategies*
- › *Product plans*
- › *Market survey information*
- › *Costs*
- › *Profits or profit margins*

As a rule, we never discuss these subjects with a competitor. Always use extreme care when speaking with a competitor or when answering questions from regulatory agencies or outside attorneys. Because antitrust law is so complex, you should consult the Ethics and Compliance Department or Legal Affairs Department in advance of any planned action involving communication with competitors, regulatory agencies or outside attorneys.

If you are a member of an industry specific trade association or attend industry conferences, exercise caution by avoiding any activities prohibited by this Policy. Prior written approval of the Chairman and CEO must be obtained before submitting any non-public information to a trade association or any of its committees. Furthermore, written approval must also be obtained from the Chairman and CEO prior to the Company's participation on standards setting bodies.

Centene is committed to being fair, honest and accountable. We compete on the basis of our superior offerings, healthcare services and employees. The Company should never compete by using unlawful measures intended to harm another company, force it from a market or prevent it from entering a market.

Antitrust Violations

LOOK LIKE...

- >> Two competitive companies confer and agree to set prices that they will charge customers or pay vendors.
- >> In a casual phone conversation, employees from two companies agree to split customers or a market territory: “You stay off of our turf, and we’ll stay off of yours.”

Q. During a conference a few weeks ago, I chatted with representatives from our competitor. We began to discuss how profits have been shrinking in the past few years. Now these companies are lowering reimbursement rates. Did I do something wrong?

A. These types of discussions can definitely be problematic. A court might conclude that everyone present during the conversation was engaged in a price fixing scheme. If you ever find yourself present during a reimbursement discussion with competitors, immediately discontinue the conversation and make it clear you consider this type of conversation inappropriate. You should then contact the Ethics and Compliance Department for further guidance.

Financial Records & Controls

Protection of Reputation and Financial Strength

Centene is committed to encouraging candid communication and transparency by keeping complete and accurate records and implementing appropriate system controls. This commitment includes general business and financial records. Accurate documentation should always be a priority. No employee should enter into any transaction with the understanding that it is anything other than what is described in the agreement and supporting documentation.

The unalterable Policy of the Company is that all transactions must be transparent and properly recorded. That there must be no disbursement or receipt of corporate funds outside the Company's system of accountability. This means there will be no "off books" funds, payments or transactions,

no "unofficial" funds, payments or transactions, and that all funds, payments and transactions must be recorded in accordance with the regular accounting process prescribed by the Company.

Our records must be complete and accurate, fully reflecting the Company's activities and transactions including claim payments, expenses, purchases, accounts receivable and sales. The information derived from these records is provided to the Company's shareholders, as well as governmental agencies; therefore, processes must follow generally accepted accounting principals and all relevant laws and regulations. Centene's reputation for integrity, as well as financial strength, depends on this.

It is difficult to delineate every practice that is or is not permissible, but certain general guidelines can be set forth. For example, a payment is prohibited if:

- › *It is illegal;*
- › *It is inconsistent with Centene's defined values;*
- › *No record of its disbursement or receipt is entered into the accounting records of the Company; or*
- › *It is entered into the accounting records of the Company in a manner, which is false or misleading.*

Inter-company transactions must also comply with the highest standards of transparency. To ensure this, it is our policy to price all inter-company transactions so they comply with

federal and state laws and contractual obligations. Where an appropriate market price can be determined, inter-company transactions will be priced at a level consistent with fair market value. In the absence of market pricing, charges for inter-company transactions will be based on cost and reasonable profit data so as to approximate fair market value. All transfer pricing will be regularly reviewed (including reviews by independent third parties) to ensure compliance with Company policy.

Because business records and controls can be complex, you should consult the Ethics and Compliance Department or Internal Audit Department when questions arise.

Improper financial records & poor controls

LOOK LIKE...

- >> James, a business analyst estimates and changes data on a monthly report to make performance appear better.
- >> Sally, a senior accountant does not accrue the appropriate amount for claims expense in the right period.

Q. I have been asked to sign a certification that a report we submit is accurate. Is this important?

A. Report certifications are very important. Certification demonstrates Centene's commitment to the integrity, accuracy and completeness of information contained in reports and document that data or information submitted has been reviewed and is accurate to the best knowledge of the certifier. You must immediately report discrepancies you are aware of to your supervisor, the Corporate Compliance Officer or call the "A Solid Commitment" Ethics and Compliance Helpline at 1-800-345-1642 if you wish to remain anonymous. A third party independent of Centene answers this line.

Fraud & Abuse

Honesty is Always Centene's Policy

Honest means communicating candidly and truthfully in all of our business relationships and transactions. While anyone can make an honest mistake, fraud is different. Fraud is not a mistake. Fraud involves deliberate deception.

Fraud is not only unethical, it is also illegal.

Examples of fraud include:

- › *Falsifying information submitted on a claim*
- › *Submitting false expense reports*
- › *Misappropriating assets or misusing Centene property*
- › *Inflating year-end numbers*
- › *Forging or altering checks*
- › *Improperly changing Company records or financial statements*

WASTE, ABUSE, AND FRAUD (WAF) PROGRAM:

We have a comprehensive program at the corporate and operating unit level for the prevention, detection and reporting of fraud and abuse. The WAF Program encompasses best practices from similar programs in the industry and processes implemented in Centene's subsidiaries. Centene's Special Investigations Unit (SIU) oversees the WAF program.

The WAF Program is designed to prevent and reduce waste, abuse and fraud among Providers, Members, employees and subcontractors. It may also help to prevent potential health risks to Members. A toll free Fraud and Abuse Hot line is available to employees, members, business partners and network providers: 1-866-685-8664.

Fraud

LOOKS LIKE...

- >> Michael, a contracting manager, always records a few extra hours more on his timesheet than he actually worked. In addition, when traveling on company business, takes a free shuttle from the airport to his hotel but includes a \$20 taxi charge on his expense report.
- >> Dr. Jones, who is a primary care physician, bills a high level office visit for every patient he sees. He is billing the same code regardless of the member's illness.

Q. I noticed some unusual things on a claim submitted by a provider. The services provided don't appear to match the provider's specialty or the member's condition. I'm not sure if this provider is committing fraud. Should I report it?

A. Yes, all concerns about potential waste, abuse and fraud should be immediately reported to the Special Investigations Unit (SIU). The SIU will evaluate the situation and, if needed, request documentation from the provider to support the information submitted on the claim. While it might not be necessarily be fraud, the Company wants to stop any wasteful or abusive billing. In addition, reviewing the appropriate information could also identify issues with the quality of care being provided to our members.

Fraud & Abuse

The False Claims Act

Under the Federal False Claims Act (FCA) any individual or entity that knowingly submits a false or fraudulent claim for payment of United States Government funds can be held liable for significant penalties and fines. The FCA applies to claims by health care organizations to Medicaid, Medicare and other government-sponsored health care payers. Potential fines for violating the FCA include a penalty of: (1) up to three times the amount of the payment made on each false claim; (2) additional civil penalties ranging from \$5,500 to \$11,000 for each false claim; and (3) payment of the cost of the civil action by the entity or individual that submitted the false claims. If found liable under the FCA, the entity or individual may also be excluded or suspended from participating in all federal health care programs.

The False Claims Act contains “whistleblower provisions” that allows people with evidence of fraud against the government to sue, on behalf of the U.S. Government, in order to recover the stolen funds. In some cases, the U.S. Government may join the whistleblower suit. If a whistleblower suit is ultimately successful, the person who initially brought the suit may be awarded a percentage of the recovered funds.

The FCA also contains a provision that protects the whistleblower from retaliation by his or her employer. This provision applies to any employee who is discharged, demoted, suspended, threatened, harassed, or discriminated against as a result of the employee’s lawful acts in a whistleblower suit. We afford employees all protections required by the FCA.

In addition to the Federal FCA, a number of states also have False Claims Acts with similar penalties that work to discourage fraud perpetrated against state governments.

Potential violations of the False Claims Act include:

- › *Billing for goods and services that were never delivered or rendered.*
- › *Submitting false service records or samples in order to show better than actual performance.*
- › *Performing inappropriate or unnecessary medical procedures in order to increase reimbursement.*
- › *Billing for procedures or tests not performed.*
- › *Unbundling - Using multiple billing codes instead of one billing code in order to increase reimbursement.*
- › *Double billing - Charging more than once for the same goods or service.*
- › *Upcoding - Inflating bills by using diagnosis codes that suggest a more expensive illness or treatment.*
- › *Billing for brand-named drugs when generic drugs are actually provided.*
- › *Phantom employees and doctored time slips: Charging for employees that were not actually on the job, or billing for made-up hours in order to maximize reimbursements.*
- › *Being over-paid by the government for sale of a good or service, and then not reporting that overpayment.*
- › *False certification that a contract falls within certain guidelines (i.e. the contractor is a minority or veteran).*
- › *Winning a contract through kickbacks or bribes.*
- › *Prescribing a medicine or recommending a type of treatment or diagnosis regimen in order to receive kickbacks from hospitals, labs or pharmaceutical companies.*

Inside Information

Fairness and Honesty in the Investment Community

Centene is committed to always being transparent in how it manages information of interest to the investment community. Employees who have access to confidential or non-public information are not permitted to use or share that information for stock trading purposes or other non-business purpose that might result in personal financial benefit or to serve as a “tip” to others. Using inside information in this manner is unethical, illegal and could result in civil or criminal penalties and violates our commitment to acting with the highest standard of integrity.

“Inside information” is any non-public information that a reasonable investor is likely to consider important in making investment decisions.

Examples of inside information include:

- › *Projections of future earnings or losses;*
- › *News of a pending merger or acquisition;*
- › *News of any significant sale of assets or the disposition of a subsidiary;*
- › *Declaration of a stock split or an offering of additional securities;*
- › *Planned changes in senior management;*
- › *Significant new products or discoveries;*
- › *Impending bankruptcy or financial liquidity problems;*
- › *The gain or loss of a significant vendor or customer; and*
- › *The possible awarding or cancellation of a significant contract*

Centene discloses financially significant information to the public by issuing a press release and filing reports with the United States Securities and Exchange Commission. Information becomes public once a release appears on a national news wire, or a filing is made, after which the information is posted on Centene’s website at www.centene.com.

Centene's board members, officers, certain employees and their closely related family or household members may not buy or sell Centene securities based on inside information. Once the information has been properly disclosed, board members and certain employees and their closely related family and household members must wait two full business days after the announcement before buying or selling Centene securities.

Centene's board members and employees must not disclose inside information to anyone outside the Company, provide tips or recommend the purchase or sale of Centene's securities to anyone if the information has not been disclosed in the proper manner.

Misuse of insider information

LOOKS LIKE...

- >> Over lunch, Mary, a department manager, learns of a potential acquisition that will improve Centene's market share and future profitability. She returns to her office and calls her broker to purchase additional Centene stock before the acquisition is publicly announced.
- >> One week before a public announcement by Centene of higher-than-expected profits, James, an associate in the marketing and communications department who knows of this information, calls his mother and encourages her to purchase Centene stock.

Q. I just learned that Centene is considering buying another publicly traded corporation. I want to purchase some stock in the company being acquired or have my spouse do so. Can I do this?

A. No. Neither you, your spouse, nor any immediate family member can purchase this stock until the inside information you have is known to the public. If you use this information or convey it to others, you will be violating Centene policies and federal securities laws. You will also be exposing yourself to termination of employment and possible criminal penalties. If you have questions about these laws and regulations, contact the Chief Financial Officer or the Ethics and Compliance Department before you make the trade.

Trade Secrets & Confidential Information

Protecting Centene's Information Assets is Everyone's Responsibility

Centene is committed to being conscientious and accountable when handling confidential Company information. Business, health and financial information is considered confidential and therefore must be:

- › *Protected by an effective internal control environment, including policies and procedures to secure the Company's assets*
- › *Made available outside the Company only with appropriate authorization and after consideration of the interests of the Company as a whole*

Certain kinds of business and financial information are crucial to Centene's success. Knowledge and information of this sort are referred to as "proprietary" or "trade secrets" because they belong to Centene rather than to any individuals or groups within or outside the Company. This information is what separates us from our competitors. Health information of our employees and those we serve is personal, private, and protected by law. For this reason, this information must be safeguarded by all Centene employees. Protecting the company's information assets is everyone's responsibility.

Examples of this type of confidential information include:

- › *Health information of employees and those we serve*
- › *Company financial information including financial statements, accounts payable summaries, vendor listings and price/cost information*
- › *Written and verbal agreements between Centene and agents, strategic partners, vendors and/or other third parties*
- › *Company computer systems and technology*
- › *Trade secrets*
- › *Due Diligence information about potential acquisitions*
- › *Customer lists and agreements, market share data and strategic plans*
- › *Policies, procedures and processes which reveal the way we do business and compete with other businesses*

Trade secrets and proprietary information are vital to a company's success, whether that be information regarding Centene or another company with whom we do business. This information belongs to the Company, and we are obligated to protect and keep it in confidence unless authorized by an officer of the company to share it in specific ways. If you have any questions about trade secrets and proprietary information, contact the Corporate Ethics and Compliance Department.

*Financial information for purposes of this policy does not include the compensation (including wages and benefits) of non-supervisory and non-managerial employees.



Properly protecting proprietary information

LOOKS LIKE...

- >> Michael obtains a signed confidentiality agreement from a prospective vendor before providing this vendor with Centene information.
- >> Jennifer works with both health and financial information. She always secures her laptop, never shares her password with anyone and keeps paper documents locked in a drawer or file cabinet.

Q. Why is protecting confidential health information so important?

A. Unauthorized uses and disclosures of health information can invade someone's privacy, damage his or her reputation, cause embarrassment and violate federal and state privacy laws. Federal and state privacy laws carry significant penalties for violations. These penalties may apply to both the Company and you individually. Improper uses and disclosures may also violate the Company's contract with a government agency or other customer. Therefore, the privacy and confidentiality of each person's medical and claim information must be protected in accordance with company policies and procedures.

Media Relations

Responding to the Media, Financial Community and Outside Information Requests

Centene is committed to being forthright and honest by providing the media and financial community with accurate information about the Company and its activities. However, it is in Centene's best interest to exercise appropriate caution about how, and by whom, official information about the company is released.

When members of the media, financial analysts, or any other third party contacts Centene to request information, the responses can have far-reaching implications, including effects on Centene's stock price and the organization's ability to compete effectively. Therefore, when Centene provides information on contracts, operational strategies, or financial

results, we must ensure that the information is accurate and that the Company is ready to publicly release the information. In addition, Centene must comply with applicable legal requirements regarding how and when such information is disclosed.

Within the various departments at Centene, there are persons who are authorized to handle requests for information or interviews about the company and its operations. Within certain parameters, these spokespersons are authorized to release information to, and respond to requests for information from, the media. These persons are typically members of the Marketing and Communications Department, Investor Relations, select

senior executives and the Chairman and CEO. Employees may not provide information on behalf of the Company or represent themselves as spokespersons of the Company.

Any requests for financial information regarding Centene Corporation or any of its subsidiaries must be forwarded to the Investor Relations Department or the Corporate Marketing and Communications Department. This would include requests for information on earnings, possible acquisitions or divestitures, the status of corporate operations or changes in senior management.

Improper responses to request for information

Additionally, we must be aware of the possible impact of comments made in public forums such as chat rooms and bulletin boards on the Internet. To avoid possible confusion and dissemination of false or misleading information, employees who post comments about the Company on the internet should be clear that they are not speaking on behalf of the Company. We should not post any information about members, trade secrets, proprietary information, insider financial information, or operational strategies.

LOOKS LIKE...

- >> Adele, who is not authorized to speak on behalf of the Company, identifies herself as an official representative of the Company and responds to comments about Centene that she believes are incorrect on an Internet bulletin board.
- >> Betsy, a human resource manager, is asked by a financial analyst why Centene's stock price went up this week. She responds to the analyst by stating "Well, we have had really strong sales in the specialty business units."

Q. A reporter called looking for some background information about Centene Corporation for an article on Centene's expansion into a new state. Can I answer her questions?

A. No. The Company will respond to press inquiries through its Corporate Marketing and Communications Department. Although the reporter asked what appeared to be a simple question, you may not have all of the relevant facts. Even if you provide accurate information, releasing it at the wrong time could interfere with the Company's plans. In addition, uncoordinated disclosure could pose problems under securities laws if the information released is material inside information. Even disclosures that may seem harmless to you may create problems.

Media Relations

Social Media

The use of social media by Centene's employees, including information shared through instant messaging, texts, blogs and social networking sites, can have a far-reaching and permanent impact on our company. Since social media enables information to spread quickly, we must consider how social media has the potential to impact Centene's business, brand and reputation. Employees are responsible for their content that is accessible through social media channels.

When using social media for personal reasons, make it clear that you do not speak on behalf of the company. You should always:

- › *refrain from making statements about the Company or other employees that are maliciously*
- › *avoid posting anything that could be attributed to Centene or give the impression that you are authorized to speak for the Company.*
- › *carefully select your words when using social media. You should not use harassing, discriminatory or threatening language.*
- › keep in mind the legal and ethical obligations discussed in this Guide including those pertaining to financial 'insider' data, trade secrets, and members protected health information

Nothing in this Social Media policy is designed to interfere with, restrain, or prevent employee communications about wages, work rules or other terms and conditions of their employment. Centene employees have a right to engage in or refrain from such activities. Contact the Ethics and Compliance Department with questions regarding social media communications.

Examples of Social Media

LOOKS LIKE...

- >> Professional networking sites such as LinkedIn
- >> Social networking sites such as Facebook, MySpace and Friendster
- >> Video and photo sharing websites such as YouTube and Instagram
- >> Micro-blogging sites such as Twitter
- >> Forums and discussion boards such as Yahoo! Groups, GoogleGroups, Yelp
- >> Personal websites and blogs

Q. I am active on a social media site. May I post information about Centene?

A. Unless you have received prior approval to speak for Centene, you may not post official information about the company on your social media site. You may engage in discussions about the terms and condition of your employment and express your own opinions about the Company as long as you are not intentionally posting information that you know to be false in an attempt to harm the Company or threaten or harass other employees.

Q. My friend writes for a blog and wants to know my opinion on health care reform because of my work at Centene. What should I say?

A. It is acceptable for you to give your personal opinion to friends and family, as long as you make it clear that you are speaking for yourself and not on behalf of Centene. If you think your friend is seeking the opinion of Centene, you should not comment but direct your friend to the Corporate Communications Department.

Electronic Communications

E-mail, the Internet and Other Forms of Communication

Centene is committed to respect privacy and keeping important personal information confidential. We expect the same from employees when utilizing information technology tools such as e-mail and Internet access.

Centene's Internet and e-mail systems are provided to help you do your job and should be used primarily for business purposes. The Company understands that under certain circumstances limited, occasional, and infrequent personal use may be acceptable; however, if you spend excessive time using e-mail or the Internet for non-business matters, or if your personal use interferes with your job duties, you may have your access restricted and you could face other disciplinary action.

The use of email, Internet/Intranet, instant messaging, telephone and voicemail systems or other Company asset to send or receive business or personal messages, including any attached electronic files/content are property of Centene and as such, remain subject to review by the Company at any time. Lawfully monitoring and reviewing our electronic communications systems is necessary to meet our obligations to maintain member privacy, protect health information, guard against data theft, avoid dissemination of insider information and trade secrets, and investigate reports of unlawful behavior. Additionally, in the event Centene would become involved in litigation or an investigation, employee e-mails or internet history may be turned over to

third parties. You should never send e-mail or internet history or other electronic communications that you would not write in a printed document.

Your work, whether it consists of e-mail, paperwork, computer files, products, customer calls or interaction, belongs to Centene. All of this work is subject to review, where permitted by law, whether it is stored electronically, on paper or in any other format. Additionally, business equipment including computers, desks, and file cabinets, belong to Centene and is also subject to search or investigation investigation for business and security reasons. Contact the Ethics and Compliance Department if you have any questions regarding careful communications.

Improper use of the Internet and other communications

LOOK LIKE...

- >> Excessive or unreasonable use of Centene's communications systems for personal reasons.
- >> Sending out privileged, legally protected, or confidential information without authorization. Confidential information includes competitive business, health and financial information (see p. 22 for additional explanation)
- >> Sending, receiving or storing any form of discriminatory, , obscene, pornographic or defamatory communications or material.

Q. My family and friends email me at work, keeping me up-to-date on events and funny stories. These are personal messages; can I expect them to remain private on my Centene computer or does the company have access to all of my messages?

A. Although you may use your Centene desktop or laptop for incidental personal use, you have no expectation of privacy in e-mail you receive in your Centene mailbox. Centene owns both your computer and all information stored on it. Centene may review those materials at any time. E-mail creates a permanent electronic record. Exercise care when using e-mail and avoid precarious situations like using strong language, passing rumors, or commenting on someone else's area of expertise in personal or business related e-mails.

Conflicts of Interest

Integrity is Our Most Important Value

Centene is committed to communicating candidly, openly, and honestly with its employees. Employees are expected to do the same when dealing with Centene or any of its subsidiaries. Conflicts of interest arise when loyalty is divided between the Company's best interest and our own personal interests. Life is full of situations where we have multiple interests, and there is nothing unethical about that. The ethical complications arise only when we act on the basis of our own personal interests rather than those that are in the best interest of Centene.

Conflicts of interest could include:

- › *Working at an outside job that interferes with your position at Centene or competes with the Company*
- › *Serving as an officer or director of or having ownership interest in another company that does business or competes with Centene*
- › *Having a family member that has ownership interest in another company that does business or competes with Centene*
- › *Using Centene information for your own personal gain, to benefit a family member or another company for which you serve as an officer or director, or in which you have financial interest*
- › *Participating in business transactions for your own personal gain based on information or relationships developed as a Centene employee*
- › *Failing to disclose that you are closely related to someone such as a vendor or customer who has sought or is seeking a financial relationship with Centene*
- › *Employing relatives or close friends who report directly to you*
- › *Having a romantic relationship with an employee that you supervise or that is in your line of supervision*

If an employee wishes to engage in a transaction or activity which is, or potentially may be in conflict, the employee must first make a full written disclosure to the Corporate Compliance Officer, an objective senior executive officer, the Chairman and CEO or the Board of Directors. Centene will evaluate the written disclosure and make a determination. Following this procedure will ensure that conflict of interest provisions are not violated.

Conflicts of interest

LOOKS LIKE...

- >> John, a senior executive, is also on the board of directors of a vendor's corporation that supplies transportation services for Centene. He reveals part of the vendor's strategic plan to increase the chance that Centene will renew the vendor's contract.
- >> Joanne, a supervisor, is the hiring manager for an open position in her department. Since her stepbrother is well qualified, Joanne hires him for the position. Although Joanne believes her stepbrother is more qualified for the job than any other candidate, because Joanne may be biased, she should have disclosed this conflict to her manager.

Q. My sister works for a competitor of Centene. We live in different areas of the country and we do not have similar jobs. Is this a problem?

A. It is always important to disclose a potential conflict of interest as soon as you become aware of the situation. The Corporate Ethics and Compliance Department will evaluate potential conflicts and provide advice on how to resolve an issue should it be determined an actual conflict exists. You should contact your supervisor or The Corporate Ethics and Compliance Department to start this process. Prompt reporting and candor is important to evaluating each potential conflict.

Gifts & Bribes

Always Use Your Best Judgment

Centene is committed to doing the right thing when dealing with business courtesies. This includes gifts that we may give or receive.

Centene trusts its employees to use their best judgment in these matters. We should always act in ways that are consistent with this guide, applicable laws, the Business Courtesies policy and procedure (CC.COMP.17), and the company's best interest. We should never use our position within the company to take unfair advantage of anyone seeking to do business with Centene. Employees should also not allow vendors, suppliers or other contractors to use business gifts or favors to unfairly influence business decisions.

No Centene employee or business intermediary when acting on behalf of Centene may offer or give anything of value for the purpose of influencing government or private contract, award, consent, legislation or other action or which would give the appearance of attempting to influence such actions. This includes, but is not limited to, paying lobbying fees to affect any contract or award. No corporate checks are to be written to "cash," "bearer" or third-party designees of a person entitled to receive payments from the company. Cash payments may never be made to employees of competitors, suppliers, customers or government agencies. Such payments are based on factors other than competition and create the potential for favoritism by such employees.

There are times when it is appropriate to offer or receive business gifts, sporting or event tickets, entertainment passes and educational opportunities. However, Centene employees shall not solicit or accept gifts, meals or other business courtesies of personal or beneficial nature valued over \$50 from government officials, business associates (including consultants) or others with whom Centene has a business or potential business connection. In addition, whenever the recipient of a gift or entertainment is a government official or employee, there is a risk that such actions may be viewed as an inappropriate attempt to influence his or her decisions. To avoid even the perception of inappropriate conduct, gifts and entertainment to government officials should be

reasonable, infrequent and always comply with the guidelines set forth in the Business Courtesies policy and procedure. Employees must always represent the highest standards of integrity and fairness in every decision.

Giving or receiving bribes or other forms of payment designed to improperly influence decisions is never acceptable. Centene requires employees to obtain supervisor approval for any type of business gift or entertainment if the value exceeds the amounts outlined in the business courtesies policy and meets the following criteria:

- › *Is not cash or gift cards that are the equivalent of cash*
- › *Is consistent with customary business practices*
- › *Is not excessive in value*
- › *Cannot be construed as a bribe or kickback*
- › *Does not violate any laws or regulations*

Unacceptable gifts or bribes

LOOKS LIKE...

- ›› Lisa, a health plan manager, plays golf every Saturday as the guest of a vendor at the vendor's country club and does not disclose this favor.

Q. A vendor offered me four tickets to a hockey game. The vendor will not be attending the game with me. Is it OK to accept these tickets?

A. No. This is a gift and not business entertainment. If you were being entertained by the vendor at the game, and the entertainment met the Centene guidelines for entertainment, it would be permissible to accept the tickets.

Political Activities

Restrictions on Supporting Political Candidates and Causes

Centene is committed to being upstanding and accountable when participating in the political process. Centene, as a business, expresses its views on local and national issues that affect its operations. The company is allowed to make corporate contributions to political candidates or office holders, but applicable laws are very restrictive. Restrictions also exist regarding how the company may solicit employees for contributions for political causes or candidates.

Centene respects your right to participate in political activities on your own behalf or on behalf of any cause or candidate you support, but asks that employees refrain from engaging in political activities at work and

strictly follow the guidelines set forth in Centene's Political Contributions policies and procedures (CC.GOVR.03, CC.GOVR.04, and CC.GOVR.05).

We must be careful not to use the Centene name, property or other resources in any way to support our personal political activities, and we should exercise discretion in discussing our personal political views with business contacts. Individual employee involvement or contributions to political or legislative matters should never be represented as coming from or endorsed by Centene Corporation, its officers or directors. Employees are not reimbursed by the company for personal political contributions, and

employee compensation will not be increased or adjusted to reflect political contributions made.

Nothing of value, including company funds, property and work time shall be contributed, expended or reimbursed to any candidate for any campaign purpose in a manner which is inconsistent with Centene's Business Ethics and Conduct Policy, the Business Courtesies Policy (CC.COMP.17), and the Political Contributions policies and procedures. This includes contributions in connection with any primary election or caucus, general election, political convention in which a candidate or nominee for the office of president of the United States, vice president of the United States, United States senator or

Unacceptable political activities in the workplace

representative is to be voted upon or otherwise elected. In addition, the company shall not provide any indirect payment or support, in any form or through any means, such as consultants, suppliers, customers, employees or other third parties. These prohibitions on company disbursements shall not prevent eligible employees from contributing to the Centene Corporation Political Action Committee (CentenePAC). For more information, see the CentenePAC Policy (CC.GOVR.01).

Contact the Ethics and Compliance Department or the Regulatory Affairs Department for details on the laws and regulations that apply to political activities.

LOOKS LIKE...

- >> Ron, a quality improvement manager, asks that all employees in his department purchase tickets to a political fundraiser for a candidate supported by a major customer.
- >> In the Company parking garage after work, Nancy, from medical management, distributes flyers for a candidate running for political office.
- >> Tony, an administrative assistant, sends an email from his computer to coworkers urging them to vote for a candidate he supports.

Q. Can Centene pay for the administrative expenses necessary to establish and operate a federal or state Political Action Committee (PAC)? May I voluntarily participate in the Company's PAC program?

A. Under federal and state laws, the Company is allowed to pay the costs necessary to establish and operate Political Action Committees. It is also lawful for Company employees to voluntarily contribute to a PAC.

Political Activities

Foreign Corrupt Practices Act

Most countries have established laws that prohibit private businesses from improperly influencing government employees. Centene complies with all applicable anti-corruption and anti-bribery laws of the countries in which it conducts business. Centene's policies and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act of 1977 (FCPA), strictly prohibit bribing government officials. Our commitment to comply with these laws and regulations is essential to maintaining Centene's reputation for integrity and fair business dealings.

It unlawful for our employees, business partners and anyone else acting on our behalf to directly or indirectly offer anything of value to a foreign government official or his or her representative to:

- › *Obtain or retain business;*
- › *Influence business decisions; or*
- › *Secure an unfair advantage.*

Even if local law allows "facilitation" payments to government officials to accelerate or guarantee routine actions, such as issuing licenses or permits, Centene requires you to obtain prior written approval from the corporate compliance officer or general counsel. Furthermore, employees are prohibited from using intermediaries such as agents, advisers or independent contractors to give or receive gifts or make payments to foreign government officials without the appropriate preapprovals.

ANYTHING OF VALUE:

A bribe or improper benefit can be considered "anything of value," including:

- › *expensive gifts*
- › *lavish meals*
- › *entertainment*
- › *money*
- › *travel expenses*
- › *promises of future employment.*

GOVERNMENT OFFICIAL:

A person may be considered to be a government official if he or she is:

- › *employed at a public hospital*
- › *a candidate for political office*
- › *an officer or employee of international government relations*
- › *any other officer or employee for an entity that is partially or wholly owned by the government.*

International transactions must be recorded accurately and with reasonable detail in our books and records. This includes providing the full name and business affiliations of those involved.

Your personal activity may be attributed to Centene and could impact the company's ability to do business within jurisdictions where the violations occurred. The penalties associated with violating the FCPA are severe for both you and the company, and can result in disciplinary action, fines and criminal prosecution.

If you know of or suspect a violation of the FCPA, you should report it immediately to the corporate compliance officer, Legal Department, or the Fraud and Abuse Hotline (1-866-685-8664). Any reports will be considered confidential unless disclosure is required by law. Federal law protects "whistleblowers" that report, in good faith, these types of issues and prohibits retaliation against such individuals. The toll-free hotline is available to employees, members, business partners and network providers to make anonymous reports.

Violations of the FCPA

LOOKS LIKE...

>> Ann, is a manager whose business unit is currently under foreign regulatory scrutiny. She offers a government official a cash payment or an expensive gift to expedite the approval of a business license.

Q. At the end of Jim's business meeting, a local government representative presents him with a gift. Jim is worried that due to cultural traditions, it will offend the official if he doesn't accept the gift. What should Jim do?

A. If possible, Jim should decline to accept the gift since acceptance of "anything of value" may be considered a bribe.

Healthcare Laws

Regulations Related to Our Unique Industry

Centene is committed to being an honest and responsible multiline healthcare enterprise. Healthcare is a unique industry with rigorous standards and special regulations. Because the purchasers of our services may be state governments or other similar entities, Centene is subject to a host of laws and regulations designed to protect the public. Our company is committed to compliance with these healthcare laws.

In the United States, healthcare law compliance seeks to:

- › *Reduce fraud and abuse in federal healthcare programs*
- › *Eliminate the improper influence of financial incentive on medical judgment*
- › *Protect patients and improve the quality of healthcare*
- › *Reduce the cost of healthcare*
- › *Ensure proper use of taxpayer money*

Healthcare law also protects private patient health information. During the course of our business activities, we may have the opportunity to view a person's medical records or other personal medical information. This information is entrusted to us with the understanding that it will be kept confidential. Employees must safeguard all medical information in our

possession. The inappropriate disclosure of confidential medical information is strictly prohibited by law and company policy.

Regardless of the motive, payments, entertainment or gifts given to officials and other personnel of the United States government, state governments and/or foreign jurisdictions in a manner which is inconsistent with the Business Courtesies policy and procedure (CC.COMP.17), are strictly prohibited. The company's relationship with public officials shall, in all respects, be consistent with all applicable policies and of a nature that the integrity and reputation of neither the public officials nor the company be questioned in the event the full details of the relationship become a matter of public discussion. All directors, officers and employees must recognize that in the process of submitting bids or obtaining government contracts, specific questions may be asked of the company to the effect that no lobbying fees have been paid in connection with procuring any government contracts. The company will be required to answer these questions truthfully and disclose any relationships that may violate this section of the policy.

Unacceptable violations of healthcare law in the workplace

LOOK LIKE...

- >> A data analyst has access to claims belonging to an employee's child. She tells a co-worker about the child's current medical condition.
- >> Providing financial incentives to a provider that are not based on measurable quality improvements documented in their contract.
- >> A patient's claim information is posted on the Internet without her knowledge or consent.

Q. I work in member services as a customer service representative (CSR). We are measured by our average speed of answer (ASA), which means "how long does it take to answer a call." I saw another employee answer calls and quickly hang up on the callers in an attempt to lower his ASA. Though I know it is wrong to hang up on a caller, I can see why the CSR feels pressure to do so. I am torn — what should I do?

A. Pressure to perform can never be an excuse to manipulate the system, this action would compromise our integrity. Intentionally hanging up on a caller violates Centene's Values and misrepresents numbers, which can lead to inaccurate reporting. In addition, this would violate requirements in our contracts. It is your responsibility as a Centene employee to uphold our Values and report such behavior to your supervisor or the Ethics and Compliance Department.

Harassment & Discrimination

Centene Policies Ensure a Safe and Diverse Work Environment

HARASSMENT

We prohibit harassment of one employee by another employee or supervisor on the basis of age, race, color, national origin, religion, disability, sex, veteran status, or any other characteristic protected by law. While it is not easy to comprehensively describe every example of harassment, it certainly would include slurs, epithets, threats, derogatory comments and unwelcome jokes, sexual advances, requests for sexual favors and other verbal or physical conduct, such as uninvited touching or sexual-related comments.

The purpose of this policy is not to regulate our employees' personal morality. It is to ensure that in the workplace, each employee is able to accomplish his or her job without being subjected to harassment.

DISCRIMINATION

It is the policy of Centene to provide all employees and candidates for employment with opportunity that is based upon their talents, skills and abilities without regard to race, religion, national origin or ancestry, age, sex, veteran status, disability or any other legally protected status under applicable federal or state law. We are committed to providing opportunities for employment development and advancement without regard to these differences, and will endeavor to provide a business and work environment that is free of behavior that is inconsistent with our equal opportunity objectives. This policy exists because we believe that the individual differences of our employees help make our business stronger and more successful, and because only through respecting those differences can we provide all employees with an equal opportunity to succeed.

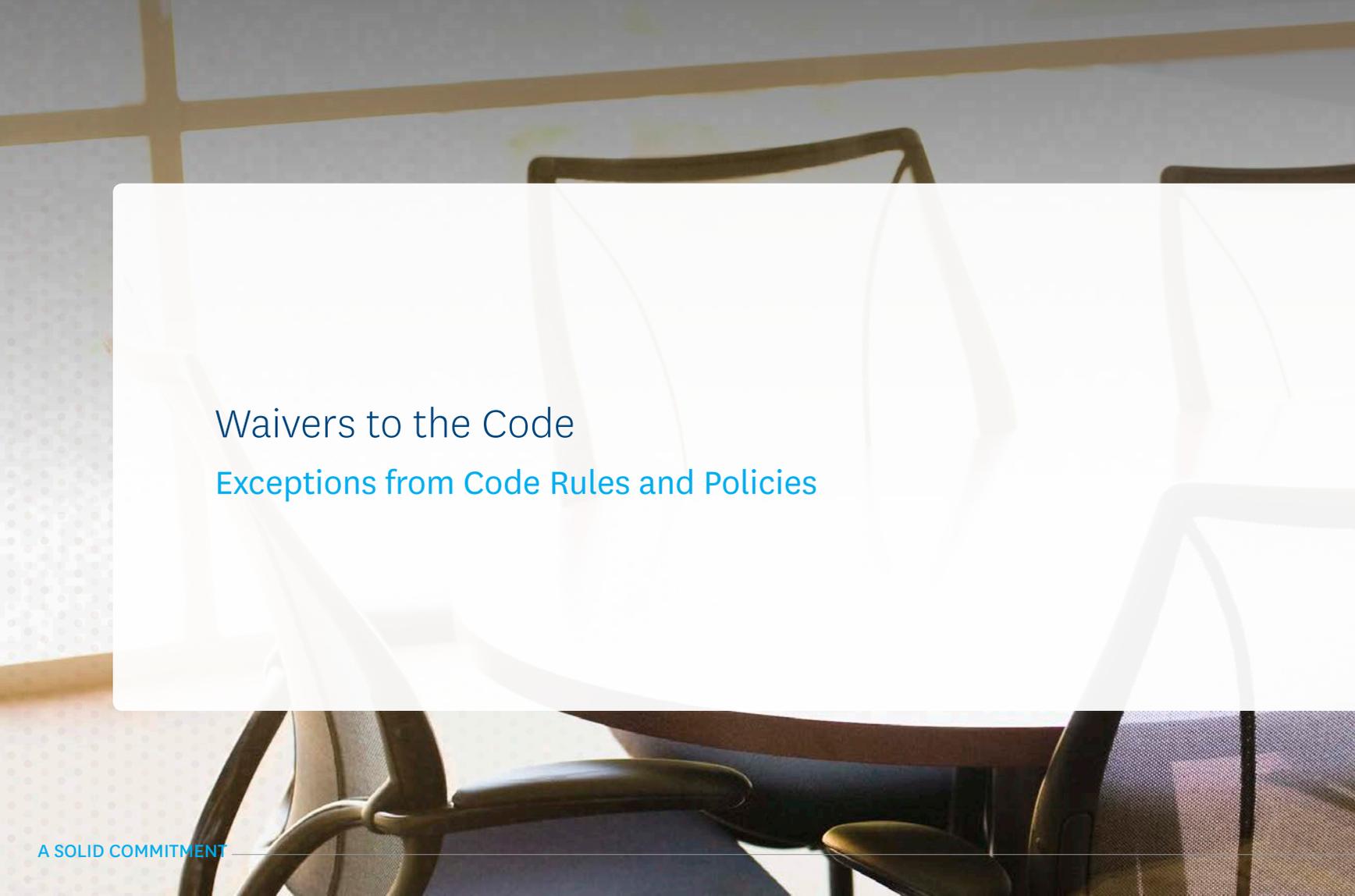
Workplace harassment and discrimination

LOOK LIKE...

- John, a provider services director, repeatedly compliments his co-worker Sara's appearance and sends her ambiguous personal e-mails, which make Sara feel uncomfortable when they work together.
- Joyce, a finance manager, just got two new employees with equal qualifications and potential in her department. She consistently seeks to work with her female co-worker as opposed to her male co-worker, thus giving the first better chance to develop and improve.

Q. One of my co-workers has a habit of telling questionable ethnic or off-color jokes. This offends me and others in my group. How can I get this to stop?

A. Company policy prohibits this type of behavior. You have the option of discussing your feelings with the person telling the joke. If you are uncomfortable speaking with the person directly, you should consult your supervisor or the Human Resources Department.



Waivers to the Code
Exceptions from Code Rules and Policies



While some of the policies contained in this Code must be strictly adhered to and no exceptions can be allowed, in other cases, exceptions may be possible. Any employee who believes an exception to any of these policies is appropriate in his or her case should first consult his or her immediate supervisor. If the supervisor agrees an exception is appropriate, the approval of the Corporate Compliance Officer of the Company must be obtained. The Corporate Compliance Officer shall be responsible for maintaining a complete record of all requests for exceptions to any of these policies and the disposition of such requests.

Any officer or director who seeks an exception to any of these policies should contact the Chairman of the Audit Committee of the Board of Directors. Any waiver of this Code for directors or executive officers or any change to this Code that applies to directors or executive officers may be made only by the Board of Directors of the Company and will be disclosed as required by law or by the regulations of the Securities and Exchange Commission.

Reporting Procedures

How to Report Concerns and Possible Violations

Centene Corporation's Ethics and Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the Company to the highest standards of ethics and compliance. That commitment permeates all levels of the organization. There is a Corporate Ethics and Compliance staff and a Corporate Compliance Committee, chaired by the Corporate Compliance Officer, that oversees the Compliance Program. All individuals involved in the process are prepared to support employees in meeting the standards set forth in the Business Ethics and Conduct Policy.

>> How Do I Report?

Centene has established a reporting procedure for circumstances in which you believe, or suspect, there has been a violation of the Code of Conduct, laws, regulations or Company policies and procedures. There are several ways in which to report a situation:

Reporting Procedures

How to Report Concerns and Possible Violations

Step

1

When in doubt, ask and keep asking until you get an answer that makes sense. Some things to consider include:

- › Is any law or regulation being violated?
- › Is the action consistent with Centene's values, our Business Ethics and Conduct Policy and other company policies?
- › Is there any documentation that helps support your concern?
- › If you know it is wrong, don't do it!

Step

2

Discuss your concern with your immediate supervisor who knows you and the potential issues at your location. If, for whatever reason, you are not comfortable discussing the matter with your supervisor, go to the next step.

Step

3

Discuss your concern with a higher level supervisor or another member of management at your location. If you still have concerns after your discussion, or if you are not comfortable discussing the matter with a higher level person, go to the next step.

Step 4

Discuss your concern with the local Compliance Officer. If there is no local Compliance Officer or if you are uncomfortable discussing the matter with the local Compliance Officer, go to the next step.

Step 5

Discuss your concern with the Corporate Compliance Officer or another corporate resource. A “Resource for Reporting Compliance Issues” can be found on the Compliance page of the Company’s intranet or obtained from your local Compliance Officer. If you are not comfortable taking this step, go to the next step.

Step 6

Call the “A Solid Commitment” Ethics & Compliance Helpline at 800-345-1642. The Helpline is managed by an independent third party and you may report your concerns anonymously. (Report online at www.mycompliancereport.com/brand/centene.) See CNET for more about the Helpline and reporting options available to employees.

Reporting Procedures

How to Report Concerns and Possible Violations

What if I simply have a Question?

Understanding and resolving ethics and compliance questions can be difficult. For this reason, Centene provides a number of resources for employees who need assistance.

If you find yourself faced with a difficult situation and are unsure how to proceed, you should first consult with your supervisor for guidance. However, there may be times when you are not comfortable seeking advice from your direct supervisor on a certain issue. This is why Centene provides confidential advisory resources for any employee who may need them.

The Corporate Ethics and Compliance Department is available to answer your questions about how to make the right choice in a difficult situation.

Corporate Ethics and Compliance Department
7711 Carondelet Avenue
Saint Louis, Missouri 63105
314-725-4477

How Centene Handles Reports of Possible Violations

No Retaliation. Each employee has an individual responsibility for reporting any activity that appears to be in violation of the law or Company policies. If you report a possible violation in good faith, using any of the procedures describe in this guide, you will not be subject to retaliation. Any Centene employee who knowingly retaliates because of such a report, or who interferes with an investigation based on such a report, will be subject to disciplinary action up to and including termination of employment. Forms of retaliation would include

being fired, demoted, suspended, reprimanded, harassed or in any way discriminated against for reporting a suspected violation. Reported concerns may not always be correct. This is why Centene investigates every report to determine if an actual violation has been committed. Reporting concerns in good faith means that you have a sincere belief that a violation may have occurred. The company only asks that you be candid and honest when making such reports.

Presumption of Innocence. What happens if someone makes a report about you and you have done nothing wrong? Remember that Centene does not assume that a violation has

occurred simply because a report is made. Instead, the Company investigates each report carefully. Centene will presume you are innocent while the investigation is taking place. It will not be determined that a violation has occurred unless the investigation produces evidence to the contrary.

Confidentiality and its Limits. Because of the safeguards in place, Centene encourages employees to feel comfortable raising ethical concerns. However, the Company understands that there may be cases in which you may want to report concerns about possible violations anonymously and/or confidentially. To the extent practicable, Centene will always

keep such reports confidential. However, if you do not identify yourself, the Company may not be able to appropriately respond to your concern. There may also be situations in which Centene cannot proceed with the investigation without obtaining additional information from you or additional parties.

Centene will not disclose any details of the investigation findings or give status reports to the employee reporting the issues; however, we may simply notify you when the matter is closed.

Ethics & Compliance Helpline

To report suspected violations of the code or seek advice regarding a specific situation call:

1-800-345-1642
(toll-free)



or go to

www.mycomplianceport.com/brand/centene

Calls are free, confidential and may be made anonymously.

