

Manual Section:	Corporate Policies and Procedures \ Government Relations and New Markets \ Government Relations
Policy Name:	Policy on Lobbying
Policy Number:	GOV18-GVR-003
Related Policies & Procedures:	GOV18-GVR-001-PR-001 Compliance with State and Local Pay-To-Play Rules GOV18-GVR-001-PR-004 Federal Lobbying Disclosure Act (LDA) Compliance
Effective Date: <small>(Compliance Use Only)</small>	01/15/10
Repealed Date: <small>(Compliance Use Only)</small>	N/A
Policy History: <small>(Compliance Use Only)</small>	Reviewed, Revised and Approved: 05/16/17
Department Policy Administrator (DPA):	Morris, Heather
Company-Wide Policy? (Y/N)	N
If no, Applicable to:	Medicaid: FL, GA, HI, IL, KY, NY Medicare: CT, FL, GA, HI, IL, KY, LA, NY, TX Other: PDP-National
<i>Most Current Version and Electronic Approvals are located in C360</i>	

Executive Summary:

WellCare Health Plans, Inc., and its affiliates and subsidiaries (collectively, “WellCare” or the “Company”), participate in the policymaking process and engage in dialogue on public policy issues at the federal, state and local levels in order to make the communities we serve better places to live, work and do business. As a participant in the policymaking process, WellCare is subject to a wide variety of laws, regulations and agency guidelines that govern its activities. These include federal, state and local statutes, regulations and agency guidance governing lobbying registration and reporting requirements.

This Policy has been developed to ensure that our political activities reflect the Company’s commitment to integrity, transparency and high ethical standards, and are conducted in strict compliance with all applicable federal, state and local laws, regulations, and rules as well as good corporate governance practices.

Moreover, this Policy is designed to provide specific guidelines for associates whose duties require interaction with federal, state and local governments, or officials or employees of such governments in any capacity.

It is also intended to inform other associates of the complex array of laws and regulations in this area and to

underscore the importance of coordinating any covered activities with the Chief Public Affairs Officer, or his or her designee, to ensure compliance with relevant laws and consistency with the Company's objectives.

Definitions:

N/A

Policy:

A. Rationale for Lobbying by WellCare

The Company and its directors, officers and associates actively lobby federal, state and local officials, consistent with applicable laws and the principles of the First Amendment, on issues that impact the Company, its members and its associates. As a business entity in a regulated industry, government decisions affect the operation and success of the Company. Therefore, it is in WellCare's interest to engage with policymakers in this manner.

B. Use of Federal and State Funds

Pursuant to its contracts with state agencies and the Centers for Medicare & Medicaid Services, the Company is prohibited from using public funds for any lobbying activity. Accordingly, any expenses associated with lobbying shall be paid out of interest income only and shall not be paid from income earned by WellCare or its subsidiaries in delivering services to state and federal customers. Procedures to ensure compliance with these prohibitions are addressed separately in Procedure GOV18 GVR-002-PR-001 and GOV18 GVR-002-PR-002.

C. Definition of Lobbying

Federal, state and local laws vary in defining what constitutes lobbying. Generally, regulated lobbying activities not only include direct communications with government officials and employees but also efforts in support of such contacts. Further, lobbying does not only include contacts regarding legislative action; lobbying may also include communications in an attempt to influence executive action, administrative matters, the execution of government programs, regulatory proceedings, and the award and implementation of government contracts. Some jurisdictions also include grassroots activity in their definitions of lobbying.

Questions about whether contemplated activities may be considered lobbying for which registration and reporting may be required should be directed to the Vice President of Public Policy and Government Affairs, or his or her designee. The Chief Public Affairs Officer shall have final responsibility for determining whether lobbying activities have occurred in a particular jurisdiction.

D. Prior Authorization Required

Directors, officers and associates shall not communicate with federal, state or local government employees or officials on behalf of the Company without the prior authorization of the Chief Public Affairs Officer, or his or her designee, unless the communication is in routine compliance or contract management activities undertaken in the normal course of business.

Further, directors, officers and associates shall not engage external lobbyists, or lawyers or consultants whose activities may involve lobbying, on behalf of the Company without first obtaining the approval of the Vice President of Public Policy and Government Affairs and the Chief Public Affairs Officer, or their designees.

WellCare requires prior authorization for two primary reasons. First, it is important to the success of the Company that advocacy on behalf of WellCare be consistent, coordinated, and focused on the long-term interests of the Company, its members and its associates. Second, lobbying is strictly regulated, and certain activities may inadvertently trigger registration and reporting requirements in a jurisdiction.

E. Obligations of WellCare as Lobbying Registrant or Principal

In many jurisdictions, registration is required prior to engaging in lobbying activities and periodic disclosures may include information on contacts and communications made with government officials and employees, expenditures on lobbying activities, and corporate and personal political contributions and activities. When the lobbying activities of the Company or directors, officers and associates require registration in a jurisdiction as a lobbyist employer, the Company and its directors, officers and associates will comply with all relevant registration, reporting and disclosure requirements. Coordination of the Company's lobbying reporting obligations is overseen by the Vice President of Public Policy and Government Affairs, or his or her designee, and must be reviewed by the Chief Public Affairs Officer, or his or her designee.

Further, the Vice President of Public Policy and Government Affairs, or his or her designee, shall ensure that the Company maintains an auditable record of lobbying activities as may be required under a jurisdiction's disclosure requirements, including but not limited to, time spent by Company directors, officers and associates on lobbying activities, the identity of those who serve as lobbyists, the issues on which lobbying occurs, the governmental officials and bodies before which lobbying occurs, and information on expenditures related to lobbying activities.

F. Obligations of WellCare Associates Engaged in Lobbying

When the activities of directors, officers and associates of the Company require registration in a jurisdiction as a lobbyist, such directors, officers and associates will comply with all relevant registration, reporting and disclosure requirements. These individuals will use approved third-party compliance vendors and agree to cooperate in providing all necessary information and documentation to ensure compliance. The Vice President of Public Policy and Government Affairs, in consultation with the Chief Public Affairs Officer, shall oversee compliance with lobbying disclosure requirements.

Further, directors, officers and associates who engage in lobbying activities on behalf of the Company are expected to inform the Vice President of Public Policy and Government Affairs, or his or her designee, all time spent on lobbying activities and any Company resources or expenditures in furtherance of such activities.

G. Standards of Conduct

Directors, officers and associates who advocate on behalf of WellCare are expected to maintain the highest standards of professional integrity and conduct. When communicating with government officials and employees on behalf of the Company, directors, officers and associates are expected to promote the best interests of WellCare at all times. In addition, those who lobby for the Company are expected to comply with the various federal, state and local laws and regulations that regulate lobbying activities.

Similarly, external lawyers and consultants are expected to obtain prior approval from the Vice President of Public Policy and Government Affairs, or his or her designee, before engaging in any activity that is or could be perceived to be lobbying activities on behalf of the Company. Outside lobbyists, lawyers and consultants engaging in lobbying activities shall be provided a copy of this Policy upon their engagement by the Company, and shall provide written acknowledgement that it has been received and understood prior to commencing work on the Company's behalf.

H. Lobbying on Government Contracts

Conducting lobbying activities in connection with procurement matters is often subject to additional restrictions under applicable laws and may impact the Company's ability to obtain or retain government business, including but not limited to:

- When a company responds to a Request for Proposals ("RFP") issued by a government agency, lobbying activities outside the standard RFP process may subject the Company to certain requirements and prohibitions, including disqualification.
- Under the law and/or terms of certain contracts, proceeds from a government contract may not be used to lobby on certain actions, including the awarding, extension, renewal, amendment, or modification to a federal contract, grant, loan, or cooperative agreement.
- Some jurisdictions may restrict or prohibit gifts or political contributions by government contractors to government officials.

Questions about restrictions on lobbying in connection with government contracts should be directed to the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees.

I. Former Government Officials/Employees

Former government officials and employees employed by the Company may be subject to restrictions or bans on their ability to represent the Company before certain government officials and agencies under federal, state and local laws, regulations and rules. The extent and duration of such prohibitions vary widely.

Former government officials and employees are required to request written guidance from the respective ethics officials at the government entity where they were previously employed that clearly describes the duration and extent of any applicable restrictions or prohibitions. Should the former government official or employee be unable to obtain written guidance from the government entity where they were previously employed, an opinion regarding any restrictions on their activities on behalf of the Company must be obtained from the Senior Director, Government Affairs Compliance. Any known restrictions or bans must be documented, and such documentation shall be appropriately archived in accordance with WellCare's Records and Information Management Standard, C13RIM.001.001-ST. Any former government official or employee employed by the Company shall comply fully with all applicable restrictions or prohibitions.

J. Audit

Although not required by law, WellCare will conduct an annual compliance review of the Company's lobbying activities.

K. Policy Violations

WellCare will take appropriate disciplinary action, up to and including termination, against any director, officer or associate whose actions are found to violate this Policy. Disciplinary action also may be taken against responsible personnel who unreasonably fail to detect or fail to report such violations as well as those who retaliate against anyone reporting a suspected violation in good faith.

L. Amendments

Amendments to this policy must be approved by the Audit, Finance and Regulatory Compliance Committee or by the full WellCare Board of Directors, with non-material changes approved by the Chief Public Affairs Officer.

Roles and Responsibilities:

N/A

References:

N/A