

Manual Section:	Corporate Policies and Procedures \ Government Relations and New Markets \ Government Relations	
Policy Name:	Policy on Political Activity	
Policy Number:	GOV18-GVR-001	
Related Policies & Procedures:	GOV18-GVR-001-PR-001	
Effective Date: <small>(Compliance Use Only)</small>	01/15/10	
Repealed Date: <small>(Compliance Use Only)</small>		
Policy History: <small>(Compliance Use Only)</small>	Reviewed, Revised and Approved: 03/28/17 Reviewed, Revised and Approved: 05/03/16 Reviewed, Revised and Approved: 06/25/15 Reviewed, Revised and Approved: 12/11/14 Reviewed, Revised and Approved: 10/07/14 Reviewed, Revised and Approved: 03/05/14	Reviewed, Revised and Approved: 12/16/13 Reviewed, Revised and Approved: 02/11/13 Reviewed, Revised and Approved: 03/01/12 Reviewed, Revised and Approved: 11/18/11 Reviewed, Revised and Approved: 01/17/11 Reviewed, Revised and Approved:
Department Policy Administrator (DPA):	Morris, Heather	
Company-Wide Policy? (Y/N)	N	
If no, Applicable to:	Medicaid: FL, GA, HI, IL, KY, MO, NJ, NY Medicare: AR, CA, CT, FL, GA, HI, IL, KY, LA, MS, NJ, NY, SC, TN, 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 the Company’s political activities. These include federal, state and local campaign finance statutes and regulations as well as rules governing the activities of government contractors, particularly with respect to political contributions, grassroots advocacy communications and personal activities of directors, officers and associates.

Doing business with governmental entities presents different risks from doing business in the commercial sector. Under state “pay-to-play” and related laws, political contributions by the Company, its political action committees (“PACs”), and individual WellCare directors, officers and associates (and in some cases immediate family

members) to public officials with responsibility for awarding government contracts may impact the Company's ability to obtain or retain government business.

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 WellCare Political Activities

WellCare believes it has an obligation to participate constructively in the political process in order to be a strong advocate with policymakers on matters of importance to our business, our associates and our members. As part of a comprehensive government affairs program that addresses our Company's long-term political and public policy goals. WellCare makes prudent political contributions to federal and state candidates and elected officials, where permissible, engages in strategic political communications with policymakers, and encourages its associates to participate in political affairs.

B. Political Contributions

Political contributions are subject to extensive government regulation and public disclosure requirements. Various jurisdictions define "contribution" differently, and the term may include the provision of in-kind goods and services as well as direct financial contributions. The Company is committed to complying with all applicable federal and state laws that limit or prohibit such contributions and those that impose reporting requirements on those making such contributions.

To ensure compliance with applicable laws and regulations, all political contributions made by WellCare or the Company's PACs are subject to prior review and approval, as detailed below. No contributions will be given in anticipation of, in recognition of, or in return for an official act by an elected or appointed official. Further, contributions are only made to support candidates, committees and/or issues that the Company has determined to be beneficial to the long-term interests of WellCare and its members and that are consistent with the Company's policy positions and core values. All contributions are made without regard to the private political preferences of Company officers and executives.

1. Political Action Committee Contributions

The Company may sponsor and support one or more PACs at the federal and state levels, as permitted by law. The federal PAC may solicit and accept voluntary contributions from certain eligible members of the Company's Board of Directors (the "Board"), shareholders, officers and associates of the Company and their families. No corporate funds are contributed to or commingled with PAC funds, except that

corporate funds and resources may be used to administer the federal PAC consistent with federal law.

The Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees, are responsible for ensuring compliance with applicable campaign finance laws. All WellCare PACs will utilize external compliance consultants and software vendors, as well as legal counsel, as appropriate.

2. Corporate Political Contributions

While federal law prohibits corporate contributions to federal candidates and committees, certain state and local laws permit WellCare to make contributions to candidates, political party committees and other political committees. Accordingly, the Company may make corporate contributions in such jurisdictions when WellCare believes contributions are in the best interests of the Company and its shareholders. In addition, WellCare may make corporate contributions to 501(c)(4) and 501(c)(6) organizations that engage in political activity.

3. Authorization and Oversight

Political contributions – whether PAC or corporate, and as discussed later in this Policy, in some cases individual – must be approved in advance, in writing, by the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees. Contributions must comply with all applicable laws and regulations in the jurisdictions in which the contributions are to be made and are subject to legal review under the direction of the Chief Public Affairs Officer, or his or her designee.

Prior to the release of contributions, the requestor shall provide all information necessary to review the appropriateness and timing of the contribution request. At a minimum, such information shall include:

- i. the name of the candidate or political committee;
- ii. the name of the company representative(s) delivering the contribution;
- iii. the name of the individual or entity requesting the contribution; and
- iv. the location and date of contribution delivery.

The Company representative delivering the contribution shall provide confirmation once it has been delivered, and the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees, shall ensure that such contributions are withdrawn from the appropriate Company or PAC account and properly reported.

Even in instances where applicable law would permit the Company to make a contribution, a decision may be made to deny a contribution request for other reasons. In determining whether or not to approve a request to make a political contribution, the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees, shall examine all relevant factors, including, but not limited to, the merits of the candidate, committee or political party committee, the timing of the proposed contribution, and the appropriateness of the Company's level of contribution.

In making any determination with respect to a proposed political contribution, the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees, may consult with external legal counsel, compliance personnel and/or other members of the Company's management.

The WellCare Board, through its Audit, Finance and Regulatory Compliance Committee (the “Committee”) shall be provided with periodic reports detailing political contributions made by the Company and by PACs affiliated with the Company. The Committee shall monitor the Company’s political spending, receive periodic reports from the Chief Public Affairs Officer and/or the Vice President of Public Policy and Government Affairs, or their designees, and review the purpose and benefits of the expenditures. In its periodic reports to the Board, the Committee will cover these topics.

4. Disclosure and Reporting

WellCare is committed to promoting transparency and compliance. To that end, WellCare complies with all applicable reporting requirements in the jurisdictions where contributions are made. The contributions and expenditures of the Company and associated PACs are all disclosed publicly through regular reports filed with the Federal Election Commission and state regulatory authorities. Additionally, WellCare publishes an annual report identifying corporate and PAC contributions made to candidates, political party committees, political action committees and other politically active tax-exempt organizations such as those organized under Internal Revenue Code section 501(c)(4). This report is available on the Company’s website.

5. Compliance Review

Although not required by federal or state law, it is the Company’s practice to undertake an annual compliance review of the Company’s corporate and PAC activities.

6. Political Contributions and Government Contracts

Some jurisdictions have imposed additional restrictions on entities that contract with governmental entities to provide services. Additionally, states may impose prohibitions on companies seeking to do business with the state during the course of the bidding process. Under these so-called “pay-to-play” laws, contributions to public officials, particularly those with responsibility for awarding government contracts, may result in the cancellation of existing contracts and the prohibition on receiving new contracts. WellCare is committed to complying with all applicable laws and regulations that limit or prohibit such contributions.

C. Political Communications

In addition to contributions to candidates and committees, the Company may, where permissible, engage in other political activities in support of the Company’s government affairs objectives.

WellCare may communicate with its directors, officers and associates, with its shareholders, with its insured beneficiaries, and with the general public on political and policy matters, only as permitted by federal, state, or local law. In certain instances, the content of such communications may be limited by the intended audience and may mandate the inclusion of required disclaimers or statements.

No political communication may be made on behalf of WellCare without the prior authorization of the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees.

D. Use of Resources and Facilities

WellCare’s use of its resources and facilities for political purposes may be considered in-kind contributions to

candidates or political committees and may be subject to limits and restrictions under federal, state or local law. Such use may include the provision of a meeting room for a fundraiser or other campaign event, travel expenses in connection with campaign activities, food or beverages for campaign events, and promotional items provided to a candidate or campaign.

The use of WellCare resources and facilities for political purposes requires prior approval by the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees.

E. Personal Political Activities

The Company respects the rights of its directors, officers and associates to support candidates and issues and to seek elected and appointed office. WellCare personnel are encouraged to participate in political activities on their own time, in accordance with their individual desires and political preferences; however, individuals may not use WellCare resources in the course of doing so.

1. General Requirements

Directors, officers and associates who engage in personal political activities must be clear at all times that such participation is as an individual and not as a representative of the Company. This is particularly true of corporate leaders such as the Chief Executive Officer, Executive and Senior Vice Presidents, Division Presidents, Regional Presidents, and Market Chief Operating Officers.

When engaging in personal political activity, directors, officers and associates shall refrain from using the Company's name in a way that could be interpreted as sponsorship or endorsement by WellCare. Further, directors, officers, and associates are prohibited from directing other WellCare personnel to assist or participate in personal political activities.

2. Political Contributions

Political contributions by individual directors, officers and associates are personal and voluntary. WellCare will not recognize, reimburse, or in any way compensate an individual for his or her personal political contributions. Moreover, directors, officers and associates may not use their position within the Company to coerce or improperly pressure other WellCare personnel, or appear to coerce or improperly pressure other Company personnel, to make political contributions or to support or oppose political candidates or elections.

In some cases, WellCare's status as a government contractor may trigger a jurisdiction's "pay to play" law. Accordingly, directors, officers and associates are required to seek prior approval from the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees, before making political contributions to state or local candidates and officials in certain jurisdictions. As of the date of this Policy, those jurisdictions are California, Connecticut, Hawaii, Maryland, New Jersey, New Mexico and Rhode Island. These restrictions and respective reporting requirements are discussed separately in Procedure GOV18 GVR-001-PR-001.

3. Seeking Political Office

A director, officer or associate considering becoming a candidate for an elected public office shall advise the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees, to ensure that all applicable laws that impact the Company are followed in the course of the individual's candidacy.

F. Policy Exceptions

A WellCare associate may request, in writing, exceptions or modifications to this Policy by contacting his or her supervisor, who will refer the request to the Chief Public Affairs Officer and the Vice President of Public Policy and Government Affairs, or their designees.

G. 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.

H. 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:

- Federal Election Campaign Act of 1971, as amended (52 U.S.C. § 30101 et seq.)
- Internal Revenue Code section 501(c)(4)

State Addenda:	
Policy Name:	
Policy Number:	
State Approval Date:	
Last Reviewed or Revised Date:	

State Addenda 2:	
Policy Name:	
Policy Number:	
State Approval Date:	
Last Reviewed or Revised Date:	