



---

# CODE OF BUSINESS CONDUCT AND ETHICS



## A MESSAGE FROM JOE ZUBRETSKY

Molina Healthcare conducts its business with an unwavering commitment to sound ethical practices and conduct. This approach is not only foundational to our operations, but it is also a commitment that I personally make to our members, state partners, providers, employees and all other stakeholders of the Company.

On July 8, 2025, Molina Healthcare, Inc. amended its Code of Business Conduct and Ethics to conform with NYSE Listing rule 303A.10, and to make various other updates consistent with evolving best practices.

This amended Code of Business Conduct and Ethics provides a roadmap to that commitment. It helps direct our behavior and decisions—from our frontline employees to our most senior leadership. Each year, we require that all our employees and board members review it and acknowledge their commitment to the principles it contains. If anyone—employees, members, providers, contractors and subcontractors or directors—perceives a violation of the Code, they are required to report it. This constant vigilance allows us to build on the compliant and ethical conduct that is a hallmark of Molina Healthcare.

We must be mindful of the Code at all times in our work for the Company. By doing so, we will successfully meet our commitment to ensure that every interaction we have and every decision we make is both compliant and ethical.

Sincerely,

Joe Zubretsky  
President and CEO



# TABLE OF CONTENTS

## CONTENTS

### **4 Introduction**

- 5 Molina's mission, vision and values
- 6 Equal employment opportunity
- 6 Integrity and ethics
- 6 Accountability

### **7 Employee rights, responsibilities and duties**

- 7 Completion of mandatory training
- 7 Duty to report
- 7 Retaliation
- 8 Audits, investigations and court proceedings
- 8 Fair treatment

### **9 Responsibilities of executives and management**

### **10 Conflict of interest**

### **11 Gifts and bribes**

### **12 Antitrust and competition**

### **13 Financial controls**

- 13 The Foreign Corrupt Practices Act (FCPA)

### **14 Anti-money laundering**

### **15 Compliance and fraud, waste and abuse**

- 15 False Claims Act
- 16 Anti-kickback statutes
- 16 Items of value and marketing requirements
- 16 Privacy and security of information
- 17 Protecting confidential information
- 17 Emerging technologies and artificial intelligence
- 17 Insider trading
- 18 Protecting Molina's assets
- 19 Records and information management
- 19 Remote work
- 19 Compliance with laws governing our business

### **20 Speaking out**

### **21 Interacting with the media**

### **21 Social media**

### **22 Facilities, environment, health and safety**

### **23 Discrimination and harassment**

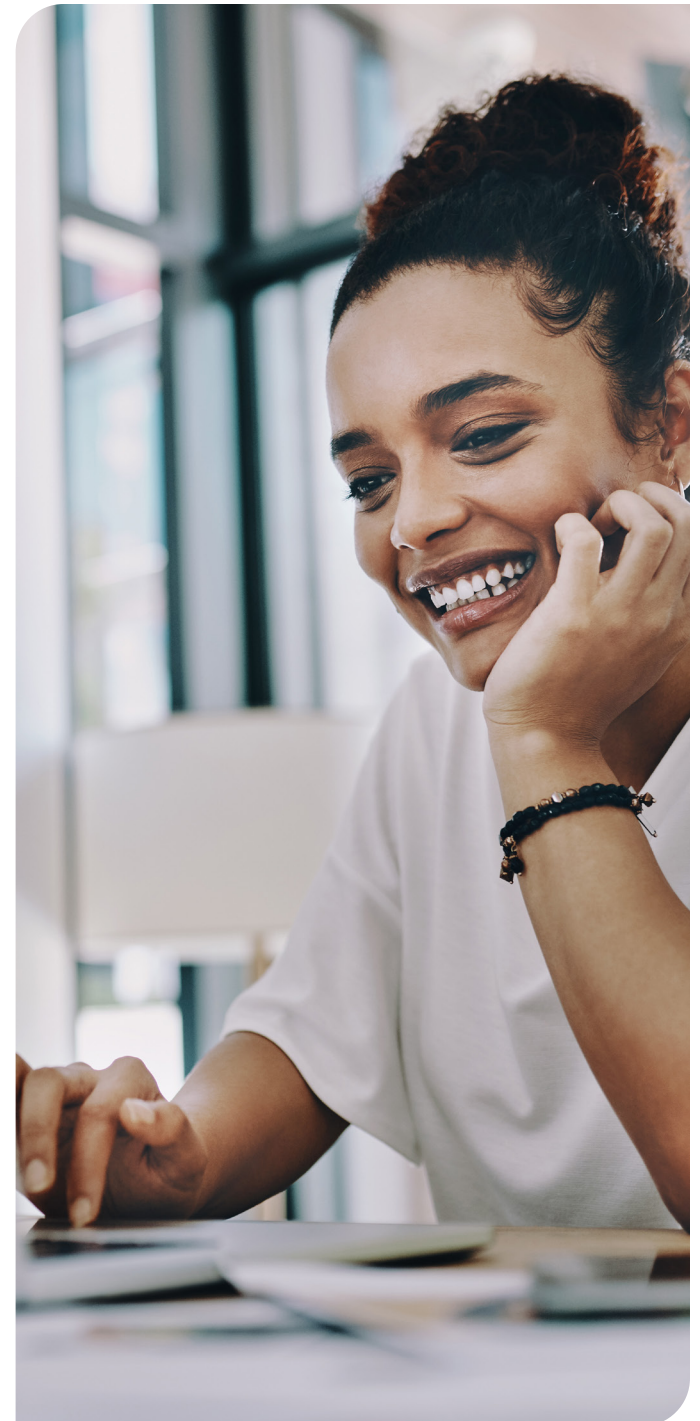
### **24 Human rights**

### **25 Investigations into an alleged violation of this code**

### **25 Waivers**

### **26 Conclusion**

### **26 Questions**





## INTRODUCTION

This Code of Business Conduct and Ethics (the “Code”) is applicable to all our employees, officers, directors, providers, contractors and subcontractors. Its purpose is to guide Molina’s affairs and detail the way we conduct our business. The Code has been approved by the Board of Directors of Molina. It is our expectation that we conduct our business in an ethical and professional manner and in accordance with applicable laws, rules and contract requirements. Whenever the Code mentions an “employee,” that usage should be interpreted as including an employee, officer or director of Molina. Furthermore, whenever the Code refers to a “subcontractor,” that usage should be interpreted as including a contractor, a subcontractor, a vendor, or any other Molina stakeholder.

As a condition of employment, all employees are required to acknowledge their receipt and understanding of this Code when they are hired and annually thereafter. Additionally, employees are required to complete a conflict of interest disclosure when they are hired, annually thereafter and at any time a potential conflict of interest arises. All employees and subcontractors must immediately report good-faith and reasonable suspicions related to a potential violation of any section of the Code.

Anyone, regardless of title or position, whom Molina determines has engaged in behavior that violates this Code, might be subject to disciplinary action, including termination. Additionally, violating this Code might result in civil liability and/or criminal prosecution. Any employee who authorizes or knowingly permits another employee to engage in a violation of this Code might also be subject to disciplinary action, including termination.

Molina’s Code is reviewed at least annually and updated as necessary to reflect alignment with state and federal requirements; key compliance, privacy and security issues, emerging risks and/or best practices; and employee relations and environmental, social and governance matters.

Molina is committed to ethical practices and compliance with applicable laws and regulations that govern all areas of our operations, including business functions executed or supported by subcontractors. These business partners must match the expectations set forth here and in our separate Supplier/ Third-Party Code of Conduct, which is accessible on [Molina’s public website](#).

Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.





## Molina's Mission, Vision and Values

The principles contained in our Code help ensure that each of our actions and decisions are compliant and ethical. In addition, the principles in our Code help to support successful alignment with Molina's Mission, Vision and Values.



### Our Mission

We seek to improve the health and lives of our members by delivering high-quality health care.



### Our Vision

We will distinguish ourselves as the low-cost, most effective and reliable health plan delivering government-sponsored care.



### Our Values

- Integrity always
- Absolute accountability
- Supportive teamwork
- Honest and open communication
- Member- and community-focused





## Equal employment opportunity

Molina is committed to cultivating a workforce that supports fairness and belonging and strives to embed these values into our culture and overall work environment.

We embrace and celebrate the unique experiences, perspectives and backgrounds that each employee brings to our workplace because it makes us a stronger and better organization. Molina employees are expected to always treat others with dignity and respect and not to exclude others on the basis of their beliefs or other personal characteristics.

Molina is an equal opportunity employer and makes employment decisions on the basis of merit, qualifications, ability and quality of performance. Molina does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, disability, service in the military or any other characteristic protected by applicable federal, state or local laws and ordinances. This policy applies in all employment decisions, including but not limited to, recruitment, hiring, placement, compensation, training, promotion, upgrading, demotion, downgrading, transfer, leave of absence, layoff, recall and termination, as well as all other terms and conditions of employment as provided by law. Molina firmly believes in equal opportunity for all, and our commitment is in compliance with the spirit as well as the letter of all applicable laws and regulations.

Employees who have witnessed or experienced behavior that conflicts with Molina's Equal Employment and Anti-Discrimination policy should promptly contact their supervisor or Human Resources.

## Integrity and ethics

Our success depends on our ability to serve our customers—members, providers, state partners, regulators, elected officials, community organizations, coworkers and other stakeholders—in an ethical and compliant manner. This requires that all Molina employees and subcontractors work with the highest degree of integrity, follow the applicable rules and always do the right thing. This Code can be used as an ethical compass. Employees have an obligation to behave professionally and not engage in any disruptive behavior. Additionally, employees have an obligation to submit accurate records related to their job responsibilities.

Our ethical principles are the values that set the ground rules for the way we perform our jobs. Employees and subcontractors are expected to be honest, respectful, fair and compassionate. Not only must we follow all legal requirements, but we must also adhere to ethical principles when performing work on behalf of Molina.

## Accountability

Every employee and subcontractor must comply with the business processes, policies and standards established in this Code. Employees and subcontractors are expected to always follow the Code. Any perceived violation, misconduct, and/or non-compliance with Molina business processes, policies, and standards, including fraud, waste and abuse, must be reported immediately to a manager, compliance officer, or via the Alertline by calling **(866) 606-3889**, or by filing a report online at [MolinaHealthcare.Alertline.com](https://MolinaHealthcare.Alertline.com).

If there is ever any doubt about how this Code applies or to whom it may apply, employees are encouraged to contact their immediate supervisor, manager, human resources, local compliance officer, or our legal department. Subcontractors should reach out to their designated Molina contact.

Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.



# EMPLOYEE RIGHTS, RESPONSIBILITIES AND DUTIES

## Completion of mandatory training

We expect our employees to deliver high-quality services to our many stakeholders and follow all the rules and regulations that govern our business. Our employees are provided with training on several important topics upon hire, including but not limited to this Code, our Compliance Program and its policies and procedures, and fraud, waste and abuse. Our employees must complete refresher training annually thereafter. From time to time, additional or updated information must be provided to our employees in real-time, often as the result of rule or law changes, developments within our organization or current events. In these instances, training is created or updated and rolled out to our team as soon as possible. Employees who fail to complete their required trainings on time may be subject to disciplinary action, up to and including termination.

## Duty to report

Our employees and subcontractors are the first line of defense in addressing any suspected wrongdoing. This means that it is our duty to report suspected non-compliance with this Code for investigation and correction. Violations of this Code, regardless of whether they are observed during or outside of regular work hours, must be reported as soon as is practical to an immediate supervisor, manager, human resources, compliance officer or our legal department. The employee or subcontractor can also report violations to another member of Molina's leadership team, chief compliance officer or the board of directors. Employees and subcontractors must not allow non-compliant or risky issues or behavior to persist without reporting their concerns.

It is the right of every employee or subcontractor to report or make an inquiry regarding possible Code violations without being subjected to retaliation or risk of losing job or contractor status.

Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.

## Retaliation

Molina's Equal Employment and Anti-Discrimination Policy explains that retaliation is an improper and adverse action an employer might take, such as acts motivated by revenge, reprisal, retribution or "getting back" at someone for engaging in a protected activity, such as the reporting of observed or perceived misconduct or noncompliance; opposing an unlawful practice; or participating in a lawful investigation or proceeding. Our employees and subcontractors have a duty to make good-faith reports of suspected wrongdoing and/or non-compliance and cooperate with investigations.

Good-faith reports are those that are made to the best of a person's ability and knowledge and relate to facts that are believed by the person to be true. Good-faith reports are made without ill will or personal benefit. Molina makes a reasonable effort to protect the identity of the reporter or any inquiry or report we receive. However, a reporter's identity may need to be disclosed if, for example, the matter becomes part of a legal proceeding or if law enforcement is involved.

Retaliation could include being fired, demoted or laid off due to the report; receiving a change in salary or scheduled hours; a change in job responsibilities or assignment, relocation or being transferred; forced or "suggested" resignation; injury to reputation, property or person; being left out of decision-making and/or meetings; abuse, harassment, discrimination and/or humiliation from supervisors and/or co-workers; promotion restrictions; negative or targeted coaching; or evaluations and heavy-handed monitoring that peers do not experience without just cause.

Retaliation can occur in many ways, none of which are tolerated by Molina. It is everyone's job to report potential non-compliance, unethical dealings or other actions and cooperate in investigations. We do not retaliate against anyone for doing their job.



## Audits, investigations and court proceedings

All employees and subcontractors must be honest and forthright in their work and interactions with their coworkers and our stakeholders. All employees and subcontractors will fully cooperate with any internal or external audit, review, or investigation. All employees and subcontractors must provide all information requested by Molina's internal and external auditors, legal representatives, human resources partners and/or compliance officers and staff.

Employees must notify our legal department if they receive any of the following: a request to appear or testify before a grand jury, regulatory body or government agency; notification that a regulatory body or government agency has started a Molina-related investigation; notification of an inspection or interview by a regulatory body or government agency; or notification from a regulatory body or government agency threatening fines, penalties or other punitive actions.

### Fair treatment

Workforce members (employees, subcontractors, temporary staff, trainees and interns) must be respectful to our employees, members, providers, regulators, community partners and competitors. Disrespectful behavior such as taking unfair advantage of anyone through manipulation, suppression of information, abuse of access to privileged information for personal gain, misrepresentation of relevant facts or any other unfair or unethical dealing or practice must be reported. Failing to meet this standard might result in disciplinary action, including termination.





## RESPONSIBILITIES OF EXECUTIVES AND MANAGEMENT

Molina has high expectations of its leaders. As a Molina leader, you must set a personal example of high ethical standards in your daily work. These requirements apply to all executive and management teams, including the board of directors, chief executive officer and other senior leaders and executives.

Like all employees, Molina's executive and management teams are required to observe the highest standards of ethical business conduct, which means a strict adherence to this Code, the letter and spirit of the following statement:

*Each executive and member of management will always act honestly and ethically, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. "Actual or apparent conflict of interest" is broadly construed and includes, for example: direct, indirect, potential or apparent conflicts, and any other personal, business or professional relationship or dealing that has a reasonable possibility of creating the appearance of impropriety or a conflict of interest.*

Each executive should make every effort, within his or her areas of responsibility, to provide full, accurate, timely and understandable disclosure in reports and documents that the Company files with or submits to regulatory agencies. Additionally, each executive is expected to provide full, accurate and understandable information whenever communicating with Molina's stockholders or the general public.





# CONFLICT OF INTEREST



Molina's Conflict of Interest policy explains that a conflict of interest exists when:

- An employee's duty to act in the Company's best interests is or can be compromised by actual, potential, or perceived benefit to that employee from another source; or
- An employee uses their position with Molina for personal financial gain or an employee's decision-making is, or could reasonably be, influenced by the promise of, or potential for, personal gain.

Conflicts of interest arise when loyalty is divided between Molina's best interest and our own personal interests. While there is nothing wrong with having multiple interests, an issue might arise when there are ethical complications that cause us to act based on our own personal interest, rather than in Molina's best interest. Every employee and subcontractor has a duty to avoid business, financial or other direct or indirect interests or relationships that conflict with Molina's interests, or where such conflicts do arise, to fully disclose and monitor them. Examples of a conflict of interest might include certain personal relationships; outside employment; involvement in community organizations with which Molina collaborates; financial interests in competitors; or acceptance of gifts, hospitality, or

rewards from contractors, suppliers, organizations, or individuals who create obligations that are hard to manage.

Because it is impossible to describe every actual, potential or perceived conflict of interest, Molina relies on the commitment of its employees to exercise good judgment, seek advice from compliance, human resources or our legal department when appropriate, and to adhere to the highest ethical standards in carrying out their job responsibilities on behalf of the Company.

If an employee or a subcontractor wishes to engage in a transaction or activity that could potentially be in conflict with Molina's interest, the employee or subcontractor must disclose this information in writing as outlined in our Conflict of Interest policy. The disclosure will be reviewed, and a determination and/or recommendation for addressing the conflict will be made.

All employees, officers and directors owe a duty to Molina to advance its legitimate interests when the opportunity to do so arises and are prohibited from directly or indirectly: taking personally for themselves opportunities that are discovered through the use of Molina property, information, or positions; using Molina property, information or positions for personal gain; or competing with Molina.



## GIFTS AND BRIBES

Gifts or rewards must be accepted with discretion, without affecting one's judgment or decision-making. It is our policy to exercise discretion in offering gifts or hospitality to members, suppliers or any other party and in full compliance with our contractual, statutory and regulatory requirements. Employees and subcontractors can request guidance from Molina's legal department when presented with any gift or reward (e.g., goods, food, beverages, event invitations, tickets) that exceeds permissible values set forth in any Molina policy (e.g., Conflict of Interest Policy).



## ANTITRUST AND COMPETITION

Antitrust laws are complex and cover a broad range of conduct that might be illegal. In general, antitrust laws prohibit making agreements or sharing information with competitors on items, including product plans, pricing, marketing strategies, or profit/profit margins. Molina complies with all applicable antitrust laws and requires that its employees do the same. If an employee intends to participate in a trade association or serve on a standard-setting body related to our industry, the employee must avoid sharing any confidential or sensitive pricing or other non-public information with our competitors.

If an employee has any questions, they should consult our legal or compliance department prior to sharing information or communicating with competitors, regulatory agencies or other third parties, including any non-Molina attorneys. Molina requires that employees and subcontractors report to the best of their knowledge any suspected antitrust violation.





## FINANCIAL CONTROLS

Molina maintains strict standards of internal accounting controls. Our chief financial officer ensures that these internal controls remain effective and comply with state and federal laws and the highest industry standards, when applicable.

Employees commit to keeping complete and accurate company records. Employees cannot create false or artificial accounting records. To ensure all records are correct, requests for payment must be accompanied by supporting documentation.

All Molina funds, payments, and transactions must be recorded in accordance with United States (U.S.) Generally Accepted Accounting Principles (GAAP). Our records must be complete, accurate, and fully reflect our financial activities and transactions, including claim payments, medical billing documentation, expenses, purchases, account receivables, and sales. This information is required to be reported to governmental agencies and shareholders, so it is imperative that we follow GAAP and other applicable laws.

Although intracompany transactions, such as loans to employees from financial institutions that do business with Molina, are permissible, these transactions must be priced at a “fair market value.” If that market pricing is unavailable, prices will be based on cost and reasonable profit data.

### **The Foreign Corrupt Practices Act (FCPA)**

The Foreign Corrupt Practices Act (FCPA) prohibits bribery of a foreign official and requires U.S. companies to maintain internal accounting controls and keep books and records that accurately reflect all transactions. The FCPA makes it a crime for Molina or its directors, officers, employees or agents to directly or indirectly offer or pay a bribe or “anything of value” to a foreign official, regardless of rank or position. The FCPA forbids not only monetary bribes but bribes of anything of value, such as stock, entertainment, gifts, discounts on products and services not readily available to the public, offer of employment, assumption or forgiveness of debt, payment of travel expenses, or personal favors. Molina is committed to complying with all restrictions imposed by the FCPA. Employees and subcontractors must report in all good faith reasonable suspicions related to activities in potential violation of the FCPA.





## ANTI-MONEY LAUNDERING

Money laundering involves the concealment of the origins of money gained through illegal activity, including drug transactions, bribery, terrorism or fraud and is a crime that can result in fines and/or imprisonment. Molina fully complies with all anti-money laundering laws and regulations.

Molina's reputation can be severely damaged by failing to detect transactions or relationships that put the Company and our members at risk. Employees and subcontractors are expected to be familiar with our programs to detect, prevent and report suspected money laundering activities, including evidence of criminal activity by a member or counterparty, transaction structures or forms of payment that lack commercial justification or other suspicious activity. Employees and subcontractors must report all good-faith and reasonable money laundering suspicions and activities.





# COMPLIANCE AND FRAUD, WASTE AND ABUSE

Molina understands the importance of protecting and strengthening our members' health care resources. As such, we are dedicated to detecting and preventing fraud, waste and abuse (FWA) in government programs and our industry. Molina operates compliance and FWA programs that are designed to detect, prevent and reduce FWA among its members, providers, employees, and subcontractors.

## False Claims Act

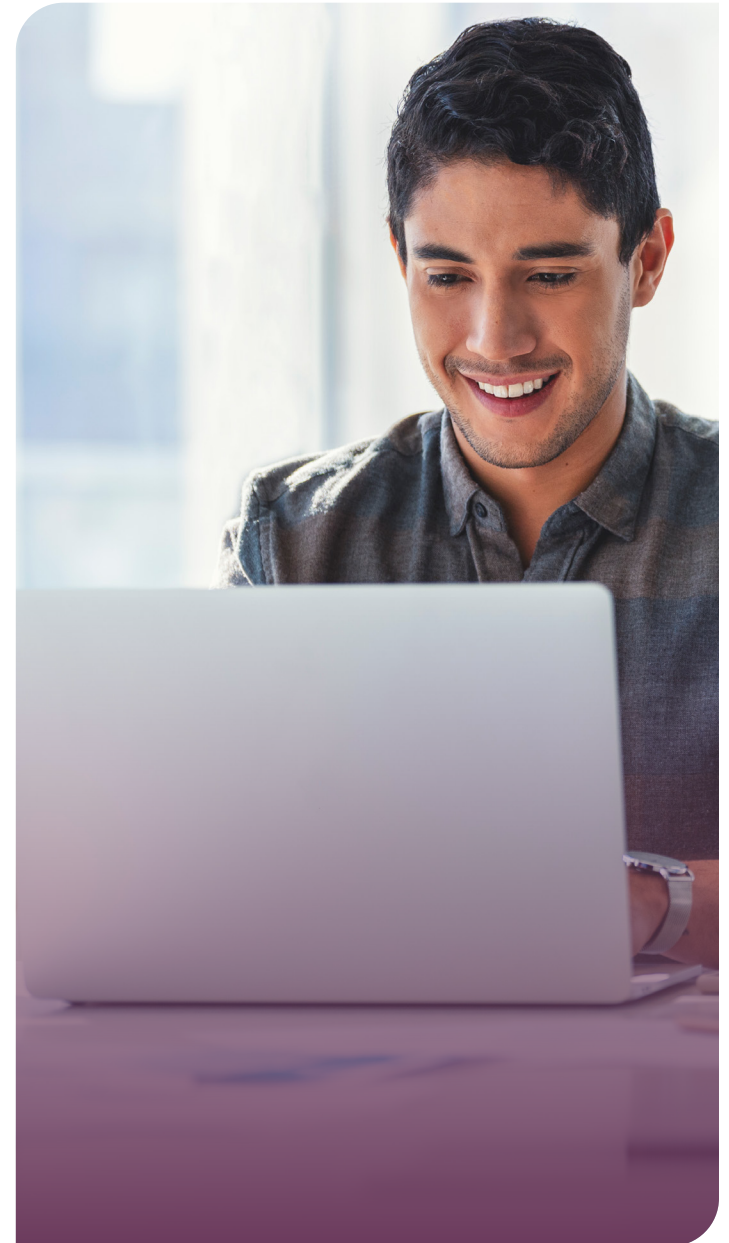
Under the False Claims Act (FCA), people and entities cannot knowingly submit a false or fraudulent claim for payment of U.S. government funds. In addition to what's considered traditional provider or member fraud, the FCA applies to claims made for payment to Medicaid, Medicare and other government-sponsored health care programs by health care companies like Molina. Potential fines for violating the FCA include:

- Up to three times the amount of the payment made on each false claim;
- Additional civil penalties for each false claim; and
- Payment of the cost of the civil action by the entity or person that submitted the false claim.

If found liable under the FCA, the Company or person may also be excluded or suspended from participating in all federal health care programs. They may also be required to serve time in jail.

We are stewards of public funds. Employees and subcontractors are required to report all actual or suspected violations of the FCA, and all suspected, actual misuse or illegal use of government funds. To encourage its employees to come forward and report incidents of false claims, Molina reminds all employees of their "whistleblower" protections under the FCA, which prohibit retaliation:

*"Any employee who is discharged, demoted, suspended, threatened, harassed or in any other manner discriminated against in the terms and conditions of employment by his or her employer because of lawful acts done by the employee on behalf of his employer or others in furtherance of an action under this section, including investigation for, initiation of, testimony for or assistance in an action filed or to be filed under this section, shall be entitled to all relief necessary to make the employee whole." (31 U.S.C. Sec. 3730(h))*





## Anti-kickback statutes

Molina conducts all business in compliance with federal and state anti-kickback (AKB) statutes and regulations and all federal and state marketing regulations.

AKB statutes and regulations prohibit paying or receiving anything of value to induce or reward patient referrals or the generation of business involving any item or service payable by federal and state health care programs. The phrase “anything of value” includes cash, discounts, gifts, excessive compensation, contracts not at fair market value, etc. Examples of prohibited AKB actions include a health care provider who is compensated based on patient volume or a provider who offers remuneration to patients to influence them to use their services.

## Items of value and marketing requirements

Under Molina’s policies, we cannot offer, solicit an offer or provide or receive items of value of any kind that are intended to induce referrals of federal health care program business. The scope of this prohibition is far-reaching and can include things such as self-referrals by members in exchange for incentives, referrals to enroll in any of our products receiving federal or state funding and incentives to encourage providers to steer members to us. This rule covers many of our relationships with vendors, providers, brokers and, potentially, even our members. The prohibition extends to money, gifts, entertainment, services, promises or anything else of value. Under our policies, we cannot give, offer, solicit or receive anything of value to induce or attempt to induce referrals or as a reward for referring a person to any person or entity to receive items or services paid for by a health care program (e.g., Medicare Advantage, state Medicaid and CHIP programs). The legal department should be consulted before offering, giving, soliciting or receiving anything of value that is not a bona fide fair market value payment for actual services or items provided. We must not directly or indirectly make or offer items of value to any third party for the purposes

of obtaining, retaining or directing our business. This includes giving favors, preferential hiring or anything of value to any government official.

Each of our health plans must conduct all marketing activities in accordance with the relevant contractual requirements and marketing statutes and regulations—both state and federal—that apply to the products offered in their state. Restricted marketing activities vary by state, but generally relate to the types and forms of communication that health plans, providers and others can have with members and prospective members. Examples of such communications include those related to enrolling members, member outreach and other types of communications. All marketing activities must be reviewed and approved according to Molina’s policies and procedures to ensure they meet all our compliance requirements.

## Privacy and security of information

Employees and subcontractors must protect the privacy and security of our confidential information and information about our members and follow all applicable state, federal privacy and cybersecurity laws and regulations, including those associated with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), as amended. Employees and subcontractors are required to follow our privacy and security policies and standards and to report any instances of non-compliance, including:

- Any unauthorized use or disclosure of protected health information. This must be immediately reported to Molina’s privacy official by calling **(866) 665-4629** or emailing [HIPAAMailbox@MolinaHealthcare.com](mailto:HIPAAMailbox@MolinaHealthcare.com).
- Any cybersecurity event, such as an act or attempt, successful or unsuccessful, to gain unauthorized access to, disrupt or misuse Molina’s information systems or confidential information, including protected health information or personally identifying information, must be immediately reported to our chief information security officer by calling **(844) 821-1942** or emailing [CyberIncidentReporting@MolinaHealthcare.com](mailto:CyberIncidentReporting@MolinaHealthcare.com).



## Protecting confidential information

All employees and subcontractors are expected to protect Molina’s confidential information, including trade secrets. Our confidential and proprietary information includes business plans, financial reports, marketing plans, know-how and processes, personnel and salary information, member information and various materials associated with our services.

Employees must keep our proprietary information confidential, unless they’re authorized to disclose such details. Employees must also refrain from disclosing any competitors’ proprietary information. Employees should refer to our confidentiality policy for more information.

## Emerging technologies and artificial intelligence

Molina believes that technology, including artificial intelligence (AI), can be used to advance the well-being of our members, to improve the member experience, and to optimize our business processes and operations. We use these tools to support our mission of improving the health and lives of our members by ensuring the delivery of high-quality health care. At the same time, we strongly believe that our implementation of these practices must be done in a manner consistent with applicable law and align with the business and ethical principles detailed in this Code. More specifically, Molina has adopted a set of risk-informed principles that govern its use of artificial intelligence, requiring that any such use be: accountable and compliant; reliable, accurate and safe; transparent; fair, non-discriminatory and inclusive; and private and secure. Every current or prospective use of artificial intelligence must adhere to these principles.

Employees and subcontractors must report all good faith suspicions of failures to adhere to Molina’s AI principles or this Code, as explained in the “duty to report” section and Molina’s Effective Lines of Communication Procedure.

## Insider trading

Molina employees and subcontractors cannot use or disclose non-public or inside information for personal financial benefit or the financial benefit of family, friends or others. Each employee is subject to our insider trading policy, which explains the laws and policies respecting transactions involving Molina’s securities and the securities of other companies.





## Protecting Molina's assets

Molina has a variety of assets, and many of them are very valuable. They include physical items as well as proprietary or private information that can also include intellectual property and confidential data. Protecting all these assets against loss, theft and misuse is very important. Examples of our assets include:

- Credit cards, cash and checks
- Buildings and fixtures
- Computers, hardware and software
- Office supplies
- Fax and copy machines
- Sensitive documents, information, data and records
- Telephones and voicemail systems
- Email, intranet and internet access

Each employee or subcontractor is responsible for protecting the Molina property assigned to them and for helping protect our assets in general. Upon termination of employment or contractual relationship with Molina, employees and subcontractors must immediately return any Company assets assigned to them.

Employees and subcontractors must also report all good-faith and reasonable suspicions related to potential instances where Molina's assets are vulnerable or misused. If you see any situation that could lead to the loss, misuse or theft of our assets, you must report this immediately to your supervisor, manager, another member of the leadership team, local compliance officer or the chief compliance officer. Employees should refer to the Use of Company Assets Policy for more information.

## *What is the difference between proprietary information and confidential information?*

Proprietary information is any information that has been created by Molina or for Molina's use and gives us a competitive advantage. Our policies, standards and procedures, as well as operational processes, are examples of proprietary information. Confidential information is meant to be kept secret or held within a small number of specific people. Protected health information (PHI); personally identifiable information (PII); employee personal information; provider tax identification (ID) numbers; provider credentialing records and proprietary information are examples of confidential information.

Proprietary information is usually confidential. This is information that isn't shared with people outside of Molina. It includes business, financial and marketing plans associated with our services, know-hows and processes, business plans, personnel and salary information, patient information and copyright material connected with our services.

Employees and subcontractors must not use nor disclose our proprietary information, except as approved by Molina. Similarly, employees and subcontractors are prohibited from stealing the confidential or proprietary information of our competitors.

Unintended disclosure of proprietary or confidential information by employees and subcontractors can also harm our interests. Employees and subcontractors should not discuss confidential information, even with approved people within Molina, when in the general presence of others (e.g., at a trade show, reception or in an airplane). Please keep in mind that harmful disclosure can start with the smallest leak, since bits of information might be pieced together with fragments from other sources to form a complete picture. Additionally, this information should not be discussed with people within Molina who are not approved to receive such information.

If questioned by someone outside the Company about our confidential information, employees and subcontractors must not answer unless they have received approval to do so. People without approval to disclose such information must refer the inquiring party to the appropriate Molina compliance officer.

If a person retires or leaves the Company, they cannot disclose or misuse any of our confidential information. They must also return any such information to Molina. Furthermore, our ownership of intellectual property created by that person while an employee continues after they have left Molina.

The requirements to not share confidential and proprietary information includes posting this sort of information on social media.



## Records and information management

We create, receive and use records during our day-to-day work. These records are corporate assets since they reflect and possess some value to our business and decisions, actions and agreements. They maintain evidence of our work and provide an audit trail of transactions and accountability for our work, allowing a user later in time to potentially replicate an activity or show how decisions were made. Regardless of format, our records must be maintained in an appropriate manner to comply with legal and regulatory requirements that govern our retention of records. Employees are responsible for adhering to our Record and Information Management Program, which has been designed to ensure that Molina's records are treated in accordance with all applicable laws and regulations. For more information, see Molina's Records and Information Management Policy.

## Remote work

Molina recognizes the importance of workplace flexibility. Because most of our employees now work outside of a traditional office setting, we have established remote work requirements to make sure we continue delivering high-quality services to our many stakeholders. Our remote work policy requires that employees maintain a remote workspace free from distractions and interruptions which can impact performance and the experience of other employees, members, providers, regulators or other stakeholders, among other requirements. Remote work environments must also allow for adherence to our privacy, security, records retention and compliance policies.

## Compliance with laws governing our business

We are part of a highly regulated industry. Therefore, laws, regulations and contractual obligations govern nearly every aspect of our business. All employees and subcontractors are held accountable to our compliance plan with respect to laws and regulations governing our business. It is imperative that we comply with the standards of this Code and immediately report any perceived violations. Employees and subcontractors must immediately report all good-faith and reasonable suspicions related to a potential violation of any laws, regulations or contractual obligations related to our business.

If an employee or subcontractor has any questions pertaining to this Code, the compliance plan, policies and procedures and/or applicable federal and state laws, they are encouraged to contact the following:

- Employees must contact the compliance department/chief compliance officer or legal department/chief legal officer, call the Alertline at **(866) 606-3889** or file a report online at [MolinaHealthcare.Alertline.com](https://www.molinahealthcare.com/alertline), and must act in accordance with the guidance and/or advice they receive.
- Subcontractors are encouraged to contact their designated Molina contact or relevant compliance officer or chief compliance officer.
- Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.





## SPEAKING OUT

Because our work involves government programs, our Company is very selective when taking positions on matters of public interest. Only a select group of people are authorized to share Molina's position publicly. Employees and subcontractors should ensure that any opinion or position they share as a person or entity does not give the appearance of speaking nor acting on Molina's behalf, unless specifically approved by the Company to do so in advance and in writing. The responsibility of speaking on behalf of the Company is reserved for Molina's chief executive officer and colleagues in our corporate communications or investor relations departments. Unauthorized employees shall not provide information on behalf of the Company or act as spokespersons for Molina.

Persons with knowledge of an unauthorized employee potentially speaking on behalf of Molina should report this information with all applicable details to the Alertline by calling **(866) 606-3889** or filing a report online at [MolinaHealthcare.Alertline.com](https://www.molinahealthcare.com/alertline).

Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.



## INTERACTING WITH THE MEDIA

Molina employees cannot speak to the media on the Company's behalf without first coordinating with our communications team. Molina will respond to the news media only through its designated spokespersons.

## SOCIAL MEDIA

Social media means technology, tools, websites and other online applications that provide users the opportunity to create and share content of their choosing or to participate in social networking. Social media platforms include blogs and websites or applications such as Instagram, Facebook, Twitter, Snapchat, LinkedIn, YouTube, TikTok, etc.

Only designated staff within Molina's social media teams are permitted to create or post content on Molina social media platforms.

Molina's Social Media Policy doesn't prohibit employees or subcontractors from using social media in their personal lives if the content being shared doesn't conflict with the expectations set forth in this Code. Employees should be aware and cautious of mixing their personal and professional lives when using social media for personal purposes. Employees must remember that all rules regarding member and provider privacy and security, as well as other confidential proprietary information discussed in this Code, apply to social media, even within personal profiles. Employees are encouraged to refer to our social media policy or contact their compliance officer or the human resources department for further guidance.

Employees and subcontractors shall always protect the privacy and security, including cybersecurity, of our members and follow all applicable HIPAA rules and regulations.

Employees and subcontractors must immediately report all good-faith and reasonable suspicions related to a potential violation of this section of the Code.

- Employees must contact the compliance department/chief compliance officer or legal department/chief legal officer, call the Alertline at **(866) 606-3889** or file a report online at [MolinaHealthcare.Alertline.com](https://www.molinahealthcare.com/alertline).
- Subcontractors are encouraged to contact their designated Molina contact or relevant compliance officer or chief compliance officer.
- Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.



## FACILITIES, ENVIRONMENT, HEALTH AND SAFETY

Employees have the right to a safe and clean work environment. Each employee is responsible for maintaining a workplace that is free of drugs, alcohol, and other harmful materials. This includes explosives, illegal firearms and weapons of any sort. Furthermore, threatened, or actual violence will not be tolerated.

Employees and subcontractors shall not possess, distribute, sell, use or be under the influence of, or impaired by, alcoholic beverages, illegal or legal drugs while on Company property, while on duty or while operating a vehicle or potentially dangerous equipment leased or owned by Molina. Additionally, employees are prohibited from any unauthorized removal of Molina property. For further guidance, please review our housekeeping and other facilities policies.





## DISCRIMINATION AND HARASSMENT

Molina's Equal Employment and Anti-Discrimination Policy prohibits any kind of discrimination and harassment in the workplace. Molina forbids discriminatory harassment with respect to race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information or any other status or condition protected by federal, state or local laws.

Any kind of sexual harassment, including quid pro quo sexual harassment or unwelcome sexual advances, including verbal, visual, or physical requests for favors and other verbal or physical conduct of a sexual or gender-based nature, is prohibited.

Any employee who believes they are being, or has been, harassed, discriminated or retaliated against should report the issue to their supervisor, manager, department leader or, if preferred, human resources partner immediately.

Employees and subcontractors must immediately report all good-faith and reasonable suspicions related to a potential violation of this section of the Code.





## HUMAN RIGHTS

Molina recognizes the importance of maintaining and promoting the fundamental human rights of employees and subcontractors by operating under programs and policies that:

- Promote a workplace free of discrimination and harassment;
- Prohibit child labor, forced labor and human trafficking;
- Provide fair and equitable wages and benefits in accordance with local laws;
- Provide safe working conditions; and
- Recognize employees' rights to freedom of association.

Molina has zero tolerance for human rights violations.



## INVESTIGATIONS INTO AN ALLEGED VIOLATION OF THIS CODE

Once a report of an alleged violation of this Code is received, members of Molina's team best experienced to address the allegation will conduct a prompt, fair and thorough investigation of the alleged violation. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed based on the context of each situation. All employees and subcontractors must cooperate with all investigations and/or audits conducted as a result of this Code.

Molina will determine whether there has been a violation of this Code based on reasonable evaluation of the information gathered, as well as the credibility of witnesses. Upon completion of the investigation, Molina will consider appropriate options for resolution, and will take any determined corrective measures against any party who has engaged in conduct that is in violation of this Code if Molina determines such measures are necessary.

## WAIVERS

Any waiver of this Code for our executive officers or directors may be made only by our board of directors and will be disclosed to the public as required by law or the rules of the New York Stock Exchange, when applicable. Waivers of this Code for other employees may be made only by Molina's chief executive officer or chief legal officer and will be reported to our Corporate Governance and Nominating Committee.





## CONCLUSION

This Code helps direct the behavior and decisions of Molina's workforce. If anyone—employees, members, providers, subcontractors, directors, or others—has a good-faith belief that a violation of this Code has occurred, or will occur, they are required to report it and cooperate with our investigation. This vigilance allows us to build on the compliant and ethical conduct that is a Molina hallmark.

## QUESTIONS

If an employee or subcontractor has any questions pertaining to this Code, the compliance plan, any of Molina's policies and procedures and/or applicable federal and state laws, they are encouraged to contact the following:

- Employees must contact the compliance department/chief compliance officer or legal department/chief legal officer, call the Alertline at **(866) 606-3889** or file a report online at [MolinaHealthcare.Alertline.com](https://www.molinahealthcare.com/alertline) and must act in accordance with the guidance or advice they receive.
- Subcontractors are encouraged to contact their designated Molina contact or relevant compliance officer or chief compliance officer.
- Nothing in this Code prevents you from communicating directly with relevant government authorities about potential violations of law.



[MolinaHealthcare.com](http://MolinaHealthcare.com)

