



COMPLIANCE PLAN

In this document, "Molina" means the following entities together, Molina Healthcare, Inc., Molina Healthcare of Arizona, Inc., Molina Healthcare of California, Inc., Molina Healthcare of Florida, Inc., Molina Healthcare of Illinois, Inc., Molina Healthcare of Iowa, Inc., Molina Healthcare of Kentucky, Inc., Molina Healthcare of Michigan, Inc., Molina Healthcare of Mississippi, Inc., Molina Healthcare of Nebraska, Inc., Molina Healthcare of Nevada, Inc., Molina Healthcare of New Mexico, Inc., Molina Healthcare of New York, Inc., Molina Healthcare of Ohio, Inc., Molina Healthcare of Puerto Rico, Inc., Molina Healthcare of South Carolina, Inc., Molina Healthcare of Texas, Inc., Molina Healthcare of Texas Insurance Company, Molina Healthcare of Washington, Inc., Molina Healthcare of Wisconsin, Inc., Molina Healthcare of Utah, Inc., Molina Healthcare of Virginia, Inc., Central Health Plan of California, Inc., ConnectiCare, Inc., ConnectiCare Insurance Company, Inc., ConnectiCare Benefits, Inc., The Management Group, LLC, Senior Whole Health, LLC, Senior Whole Health of New York, Inc., Universal Care, Inc., Molina Care Connections, LLC, Molina Clinical Services, LLC.

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MESSAGE FROM MOLINA'S CHIEF COMPLIANCE OFFICER

As you know, Molina's mission is to distinguish ourselves as a valued, effective and reliable partner in government-sponsored care. We do this by executing on the promises we make — not only to our regulators, members and providers, but also to the communities we serve. I am proud to lead our team of compliance professionals, focused on operating an effective compliance program, and serving as trusted partners here to help as you work through issues that come your way. Our role is to support Molina's leaders and employees to ensure we keep the promises we've made — both ethically and in compliance with the many rules, laws, regulations and contract requirements that govern our business. While our team operates an effective compliance program, the responsibility for compliance and integrity in our day-to-day lies with each of you.

We work in one of the most dynamic and highly-regulated industries in the world. One of our company's values is **Integrity Always**. It is essential to Molina's success and mission that we always do the right thing. It is what is expected of us by our Board of Directors, members, providers, regulators, communities and other stakeholders.

Understanding and following the laws and regulations that direct our business is just the first step. What we do is complicated, and every role and situation is unique. We do not expect you to know every rule or law that governs our business, but, if you follow our Code of Business Conduct and Ethics, (The Code/ Code) and compliance policies, Molina will stay on a course for success.

Please use this Compliance Plan as a guide to help you understand how our compliance program operates. Your role and responsibilities are important parts of it.

You are our first line of defense against potential noncompliant issues, risks and wrongdoing. Molina counts on you to report and escalate compliance issues, participate in compliance trainings, assist in the correction of noncompliance and cooperate with

any corrective effort that results from incidents of non-compliant, unethical or illegal behavior or processes.

If you suspect noncompliance or wrongdoing, please do not hesitate to speak up. Take your concerns to your leadership. Molina's leaders must welcome discussion of compliance matters with an open door and mind. If you feel more comfortable speaking with someone else, Molina's compliance team is always here to help — please reach out. You can also use Molina's confidential and anonymous AlertLine, which is available for anyone's use 24 hours a day, 7 days a week. You can find the AlertLine's online or toll-free telephone contact information on our public website, in our or on Molina's intranet site, **The Hub**. All reports are investigated, addressed in a timely manner and are kept confidential to the extent permitted by law.

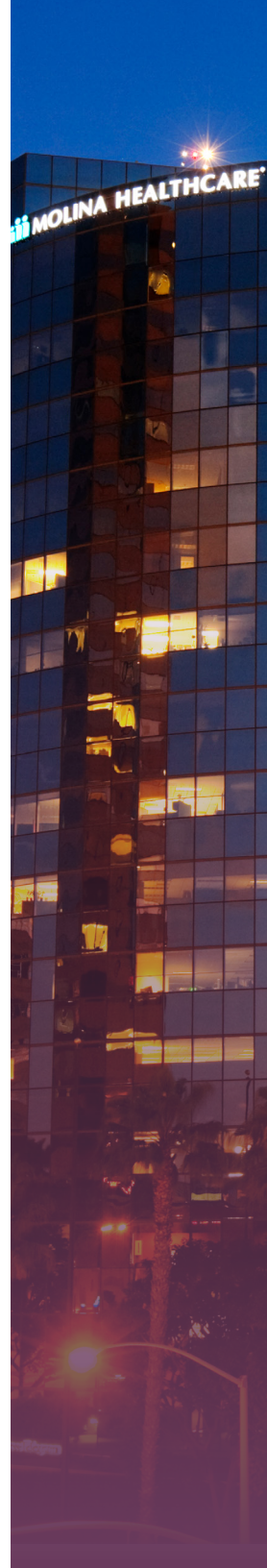
The strength of our compliance program depends on our partners across Molina's organization working hard, raising their hands when there is a problem and focusing on effectively fixing issues as they occur. It is everyone's job to report potential noncompliance, unethical behavior or other actions and cooperate in investigations. Molina enforces a strict non-retaliation policy that not only protects those who raise concerns from adverse action related to having made a good-faith report but also subjects those found to express retaliatory behavior to disciplinary action, up to and including termination.

Please don't hesitate to reach out to me directly with any questions or concerns. I can be reached at **(562) 506-9205** or Christopher.Mardesich@MolinaHealthcare.com.

Thank you for your support of our compliance program.

Chris Mardesich

Chief Compliance Officer
Molina Healthcare, Inc.





OVERVIEW

Molina's compliance program benefits not only our company and employees, payers, subcontractors and regulators, but also our members and the public. Our compliance program seeks to increase efficiency, detect and prevent fraud, reduce waste, minimize confusion and improve the quality of services we provide. At Molina, we consider our compliance program to be the embodiment of our commitment to abide by and uphold our internal policies, state and federal laws, regulations and contract requirements (together "federal and state requirements") that govern our business and activities. **Integrity Always** is one of our core values.

Molina's work is complex. To avoid the risk of noncompliance, we have controls in place to lessen the impact of noncompliance and risk on our operations, members, providers, regulators and communities. Molina's compliance program is a comprehensive system of proactive and integrated internal controls and activities — dedicated to operational excellence, compliance with requirements and risk mitigation.

This Compliance Plan serves as a program description. It considers industry best practices and meets necessary requirements to safeguard state and federal governments, and members, providers, taxpayers, local partners and communities against fraud, waste or abuse ("FWA") that could result in misconduct or noncompliance within our operations. Molina's compliance program operates with the full support and force of our subsidiary and parent company boards of directors, executives and senior management teams.





COMPLIANCE PROGRAM OVERSIGHT

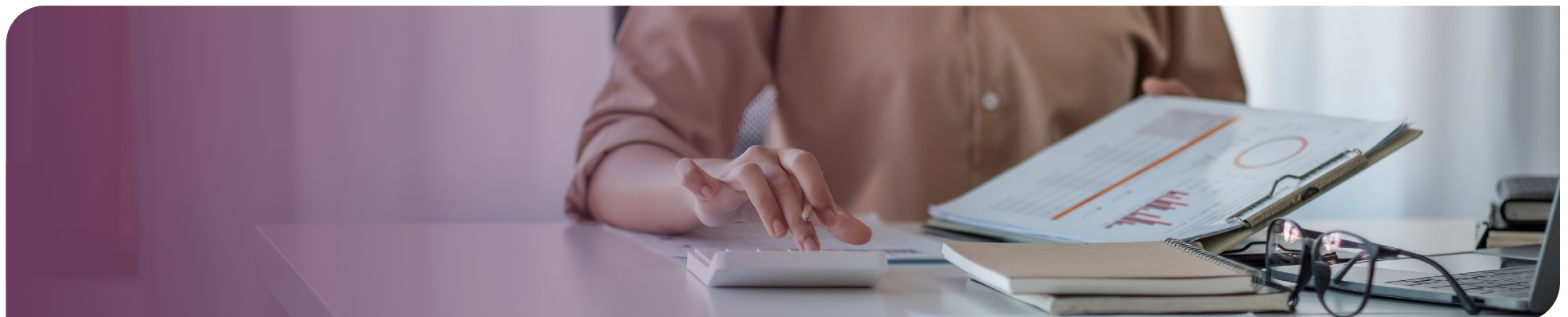
Molina's compliance program is designed to foster a culture where employees at all levels of our organization work with **Integrity Always**, prioritize ethical behavior and decision-making and comply with all applicable rules, laws, regulations, contract requirements and other regulatory guidance.

Molina's boards of directors are responsible for directing our actions and assessing our performance, including our management of risk and compliance with the laws, regulations and contractual obligations governing the activities of Molina and the government programs in which we work. Molina Healthcare, Inc. (MHI) and each of its subsidiaries have a board of directors. Molina's compliance program is directly accountable to each of the boards of directors. Each board receives regular reports and considers recommendations from their compliance officer concerning matters of compliance. Each board of directors may, at its discretion, issue directives concerning compliance to their compliance officer, who is responsible for carrying out such directives.

This Compliance Plan is the bedrock of our compliance program. It documents our approach to ensure effective compliance with federal and state requirements, our Code of Business Conduct and Ethics ("the Code"), policies and procedures and what we do when we suspect noncompliance or wrongdoing. Molina's Compliance Plan ("Compliance Plan") is supported by the MHI board of directors ("the Board").

The Code and federal and state requirements specific to the construction and operation of an effective compliance program, established by the Centers for Medicare and Medicaid ("CMS"), state Medicaid agencies and other regulatory bodies are incorporated into the Compliance Plan. The principles contained in the Code and Compliance Plan apply to our participation in Marketplace, Medicaid and Medicare Part C and D services, including Medicare Duals programs, and commercial business.

Another important part of our compliance program is its oversight committee structure. The Quality and Compliance Committee of the Board is charged with supporting the chief compliance officer in the review and oversight of our compliance program. This committee is accountable to senior management and the chief executive officer for reviewing the effectiveness of our compliance program's various components. The chief compliance officer is responsible for escalating risks and ongoing issues of noncompliance to executive leadership, the chief executive officer and the Board. Line of business and health plan compliance officers have their own "local" committees that focus on local compliance issues. Local compliance issues are escalated beyond the line of business or health plan by the entity's compliance officer and/or members of executive leadership.





COMPLIANCE PLAN

Molina's compliance program demonstrates our commitment to compliance with internal policies and procedures, and federal and state business requirements. Our compliance program is built around the seven elements of an effective compliance program described in the Department of Health and Human Services Office of Inspector General's (OIG) Compliance Program Guidance as well as the United States Federal Sentencing Commission's Federal Sentencing Guidelines to ensure that our work with Medicare, Medicaid, Marketplace and commercial programs is implemented correctly, and to ensure compliance with all state and federal requirements.

Molina's compliance program is supported through internal controls and compliance-focused processes that have been implemented and embedded within our operations. They ensure the integrity of our work and support our ongoing compliance with state and federal requirements by proactively detecting and preventing failures.

This Compliance Plan serves as a program description intended to explain our approach to effective compliance. The Plan is reviewed regularly, and updated with best practices, changes in the law or the health care marketplace, current events or trends and our evolution as a company. Molina continually enhances how compliance is operationalized by empowering business units to monitor their performance and ensure prompt detection, escalation and correction of noncompliance of any type.

Molina's Compliance Plan is made available to all parties to which it applies, including employees at all levels of Molina's organization and the Board, as well as contractors, subcontractors, vendors and first-tier, downstream and related (FDR) entities (also known as "suppliers").

The chief compliance officer updates the compliance program and/or Compliance Plan as needed to reflect changes to regulatory guidance, adopt industry best practices, implement interventions to improve program effectiveness or for any other reason at their discretion. The Compliance Plan is reviewed and updated as needed, but **no less than annually** at the discretion of the chief compliance officer. The MHI Board and subsidiary boards of directors are informed of updates as they occur.





COMPLIANCE PLAN ADDENDUMS AND WORK PLANS

This Compliance Plan is accompanied by addendums and work plans tailored to the risk and experience for our parent company and each of our lines of business (Medicare, Medicaid, and Marketplace/commercial) and health plans. The addendums and work plans are implemented by compliance officers assigned to manage compliance operations for our parent company, lines of business and individual health plans. An addendum includes more detailed information about Molina's execution of local compliance requirements for an entity, as applicable. A work plan documents the compliance interventions planned specifically to address local risk and improve efficiency and effectiveness of the compliance program for an entity throughout each year. Each work plan includes metrics used to monitor performance, the quality of compliance interventions and to determine the overall effectiveness of the compliance program. Compliance officers update these documents as needed and at their discretion to reflect changes to regulatory guidance, adopt industry best practices, implement interventions to improve program effectiveness or for any other reason at their discretion. The addendums and work plans are reviewed, approved and overseen by the relative compliance committee and board of directors, as required. These documents may also be reviewed and/or approved, as required, by applicable regulatory agencies.





GOALS AND COMPLIANCE PROGRAM EFFECTIVENESS

Molina's Compliance Plan is structured to address identified risk (both actual and potential), and protect our members, providers, state and federal regulators and communities from harm. Compliance is not the sole responsibility of the compliance department. Molina is accountable at **all levels** of our organization to operationalize compliance. Employees are trained on their responsibility to report suspected wrongdoing and/or FWA. Business units and leadership are responsible for self-monitoring their operations' performance and compliance with requirements.

Molina's compliance officers use their custom-built, dynamic work plans to manage the different activities summarized here, selected to address challenges and enhance the compliance program for their entity. In doing so, the compliance officers use key metrics associated with compliance activities to determine the effectiveness of their compliance activities and adjust as necessary.

Data points on the following topics may be used for this ongoing assessment: Noncompliance actions issued by relevant regulators, internal and external corrective action plan completion, audit findings, especially those that are recurring due to incomplete remediation, compliance training completion rates, validation of newly implemented requirements, AlertLine report trends and monitoring of business unit-focused key performance indicators. These metrics are also tracked in each entity's operating plan (a plan that details how the entity will achieve its and Molina's goals for the year). Results are reported to the compliance committee, regulatory compliance committee, boards of directors and Molina enterprise executive leadership, as appropriate.





ELEMENTS OF MOLINA'S COMPLIANCE PROGRAM

At Molina, compliance is everyone's responsibility. Compliance is a priority, and it's built into every level of our business. Our compliance program focuses on honesty, integrity and making professional and ethical decisions while providing quality service to our members, providers, regulators, and other business partners.

Because noncompliance could cause member or provider harm or be costly to the federal and state health programs we support, Molina works to build three lines of "compliance defense" into every level of our business operations — to proactively prevent, detect and address issues as they occur.

Molina's Three Lines of Compliance Defense

In following the Three Lines of Compliance Defense model, Molina employees serve as our foundational and most significant first line of defense against compliance failures because they are our "feet on the street" — responsible for leading and participating in compliance activities like self-monitoring, self-auditing, internal controls and training and education of compliance standards. These efforts help each business unit engage in proactive compliance activities, thereby identifying and correcting any compliance risks before they fall out of compliance. By ensuring all employees understand and embrace their compliance responsibilities at the business unit level, our proactive, "first-level" compliance program acts as an early warning system to identify any potential contract compliance issues.

Molina's compliance program, as described in this document, is our second line of defense. The professionals in our compliance department implement and maintain our effective compliance program, constructed to prevent, detect and correct FWA and/or noncompliance with federal and state requirements within our operations.

Molina's Three Lines of Compliance Defense



The Molina board of directors is our third and final line of defense. They are the ultimate escalation point, and ensure all federal and state requirements are met, and, as necessary, corrected if not optimally compliant. The board of directors provides oversight of our compliance program. They are well-informed of any compliance matters and issues so they can provide objective and independent assurance that the first and second lines of compliance defense are operating effectively. This helps assure regulators and outside auditors that the control culture in Molina is a well-designed, effective defense against our highest level of compliance oversight within our business requirements.

Because Molina works in federal and state health care programs, our compliance program is based on the seven elements of an effective compliance program described by the United States Department of Health and Human Services OIG's Compliance Program Guidance and United States Federal Sentencing Commission's Federal Sentencing Guidelines.

The next section provides a high-level summary of Molina's adoption of the elements of an effective compliance program, which is our second line of defense. Molina's compliance policies and procedures provide more detailed information on our compliance department's operational processes.



WRITTEN STANDARDS

At a minimum, we maintain the following written standards that explain and confirm our commitment to compliance with federal and state requirements:

Code of Business Conduct and Ethics

The Code serves as the primary resource that communicates our culture of compliance and the expectations we have for our employees, directors, officers, subcontractors, vendors and other stakeholders. The Code is our set of compliance and ethical guardrails. It is disseminated to all employees upon hire and annually thereafter, and is available on the Hub and our public-facing website.

Molina's compliance program is the custodian of the Code, which complements this Compliance Plan. The Code is reviewed at least annually and updated as needed to reflect alignment with our compliance program and priorities, state and federal requirements, key compliance, privacy and security issues, emerging risks and/or best practices, employee relations and environmental, social and governance matters, including diversity, equity and inclusion. This review is conducted by a collaborative, multidisciplinary team selected by the chief compliance officer. The Code is reviewed and approved annually by the Board.

Any changes made to the Code are communicated, as necessary. All Molina employees and the board of directors of our parent entity **must** read and attest to their understanding of the Code annually.

Third-Party/ Supplier Code of Conduct

Compliance with this Code and a third-party Supplier Code of Conduct ("Supplier Code") are contractual requirements of various suppliers with whom Molina does business. The Supplier Code can be found on our public website. It is also 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, employee relations and environmental, social and governance matters, including diversity, equity and inclusion. This review is conducted by a collaborative, multidisciplinary team selected by the chief compliance officer. The Supplier Code is reviewed and approved annually by the MHI Board. Any changes made to the Supplier Code are communicated, as necessary.

Policies and procedures

In addition to the crucial tone-setting documents detailed above, our business units maintain policies and procedures, workflows (or standard operating procedures), desk or quick reference guides and other employee materials that provide more technical details about the procedures and processes that **must** be followed to remain compliant. These written standards are **extremely** important because they are the means through which Molina articulates how we commit to compliance and adhere to all applicable federal and state laws, rules, regulations, guidelines, standards and contract requirements, and the prevention, detection, reduction and reporting potential FWA suspected of members, providers, subcontractors or Molina. Human resources maintain policies and supplemental business unit policies and procedures that set the tone for behavior in our workplace.

Policies and procedures are managed in accordance with a standardized process, which requires all policies and procedures be reviewed no less than annually and updated more often, as necessitated by change in law, regulation or contract requirements. All written policies and procedures are maintained on standard Molina templates. This ensures consistency in the format and style. Policy and procedure-supporting documents (workflows, trainings, diagrams, resource libraries, etc.) are updated as necessary. Molina's policies and procedures are accessible to all employees at any time in Compliance Central, Molina's web-based compliance governance system. The policy and procedure module in Compliance Central includes search functionality and has the ability to track which documents are accessed most frequently. Workflows and other job aids are maintained within each business unit.

The compliance program implements, maintains and updates policies and procedures regarding the organization, operations and other important components of our compliance program. These documents also explain in more detail how our compliance program works, and how Molina complies with the laws that govern our business, such as those that prohibit false claims, bribery, money laundering or public corruption, or those that protect the privacy and security of the information we use to do our jobs.



GOVERNANCE, COMPLIANCE OFFICERS AND COMPLIANCE COMMITTEES

The effectiveness of Molina’s compliance program depends on thoughtful, proactive oversight at all levels of our operations, including, but not limited to, the roles and responsibilities held by the Board, the chief compliance officer, the Compliance Committee structure and senior management.

Chief compliance officer

The Board entrusts the oversight and operation of Molina’s compliance program to the chief compliance officer — a Molina Healthcare, Inc. executive-level leader — responsible for the oversight of compliance for Molina as a whole.

While Molina’s chief compliance officer is ultimately accountable to the Board, they report directly to a member of our executive team and provide independent reports to the Board’s Quality and Compliance Committee regarding the work and implementation of our compliance program, and our compliance with state and federal requirements.

The chief compliance officer reports to the Quality and Compliance Committee quarterly and is empowered to report matters directly to the Board at any time without prior approval of members of executive management.

The chief compliance officer works with executive and management leaders across Molina to foster and protect our culture of compliance and assures that compliance programs throughout the organization are effective and efficient in managing risk and identifying, preventing, detecting and correcting noncompliance with Molina’s policies or the federal and state requirements that govern Molina’s activities and the government programs in which we work. The chief compliance officer also interacts with the Board, chief executive officer, suppliers, legal, state and federal representatives and others as necessary to ensure compliance.

The chief compliance officer is supported by several teams staffed with compliance professionals responsible for implementing and operating our compliance program. The core teams reporting up to the chief compliance officer include:

- Compliance liaisons
- Compliance operations
- Delegation oversight
- Health plan compliance officers
- Medicaid compliance
- Medicare compliance
- Marketplace compliance
- Privacy official
- Chief information security officer (CISO) and security governance:
 - Record information management
 - Physical security
 - Business continuity

The chief compliance officer is also responsible for cooperating with internal departments in support of Molina’s compliance program, such as partnering with human resources on the application of Molina’s disciplinary standards.

Performance reviews of the chief compliance officer shall be based on the chief compliance officer’s job description, which shall include a description of duties and responsibilities, as well as a written statement of performance expectations.



MHI Quality and Compliance Committee

Molina's compliance program receives formal, high-level oversight by the Board and its Quality and Compliance Committee. This committee is the governing body that approves, implements and oversees our compliance program in its guidance and oversight of our work, and oversees Molina's FWA program. The Quality and Compliance Committee meets no less than quarterly.

Segment and health plan compliance officers

To ensure our Compliance Program has a strong presence in every area of our operations, each of Molina's business segments (Medicare, Medicaid and Marketplace/commercial) and health plans install compliance officers who serve as independent, executive-level leaders responsible for implementing this Compliance Plan as well as an addendum and work plan that documents associated compliance activities in support of the entity for which they are accountable. The compliance officers are the principal, local contact in addressing compliance questions and issues, conducting risk assessments, coordinating audits of business operations, performing investigations or assessments of suspected noncompliance, misconduct or compliance risk, facilitating corrective action, conducting training as needed on an ongoing basis, selecting an internal compliance audit work plan and monitoring FWA work conducted by the Special Investigations Unit (SIU).

Molina's compliance officers report directly to their entity's board of directors at least quarterly through formal or informal reports. The compliance officers directly contact members of the board of directors at their discretion. For purposes of day-to-day matters, performance assessments and other reviews, the compliance officers shall report to the chief compliance officer or their designee. Performance reviews of the compliance officer shall be based on the compliance officer job description, which shall include a summary of duties and responsibilities, as well as a written statement of performance expectations. Input from the board of directors and key management personnel with whom the compliance officer works shall be used in assessing and reviewing their performance.

Our compliance officers interact with regulators, external auditors, Medicaid Fraud Control Units and other law enforcement agencies, FDRs and other suppliers, employees and members of management at every level of our organization. They are local subject matter experts and champions charged with ensuring all Molina employees are engaged and confident in our compliance program and their responsibility to support it.



Compliance liaison

Molina has a compliance liaison serving as a subject matter expert who counsels and advises business units as they enhance their first line of compliance processes. The compliance liaison drives compliance efforts, initiatives and returns for business units on an ongoing basis to support the first level compliance defense.

The liaison and their support team function as an operational “hub” to ensure coordination, communication and effective relationships between business units as well as between compliance resources across the lines of business and health plans who rely on these departments to execute their business responsibilities. Additionally, the liaison team analyzes root cause of issues, initiates effective corrective action and supports the business units as they enhance their first line of defense to mitigate repeat occurrences of noncompliance or risk.

Regulatory Compliance Committee

The Regulatory Compliance Committee is a subcommittee of the subsidiary boards of directors, responsible for oversight of the compliance program and compliance with federal and state requirements. Members of the subsidiary boards of directors and senior leadership make up this committee’s membership. Assigned legal counsel attends only in an advisory role. The board chair is also the chairperson of the Regulatory Compliance Committee and has final decision-making authority. The Regulatory Compliance Committee meets as needed, but no less than quarterly.



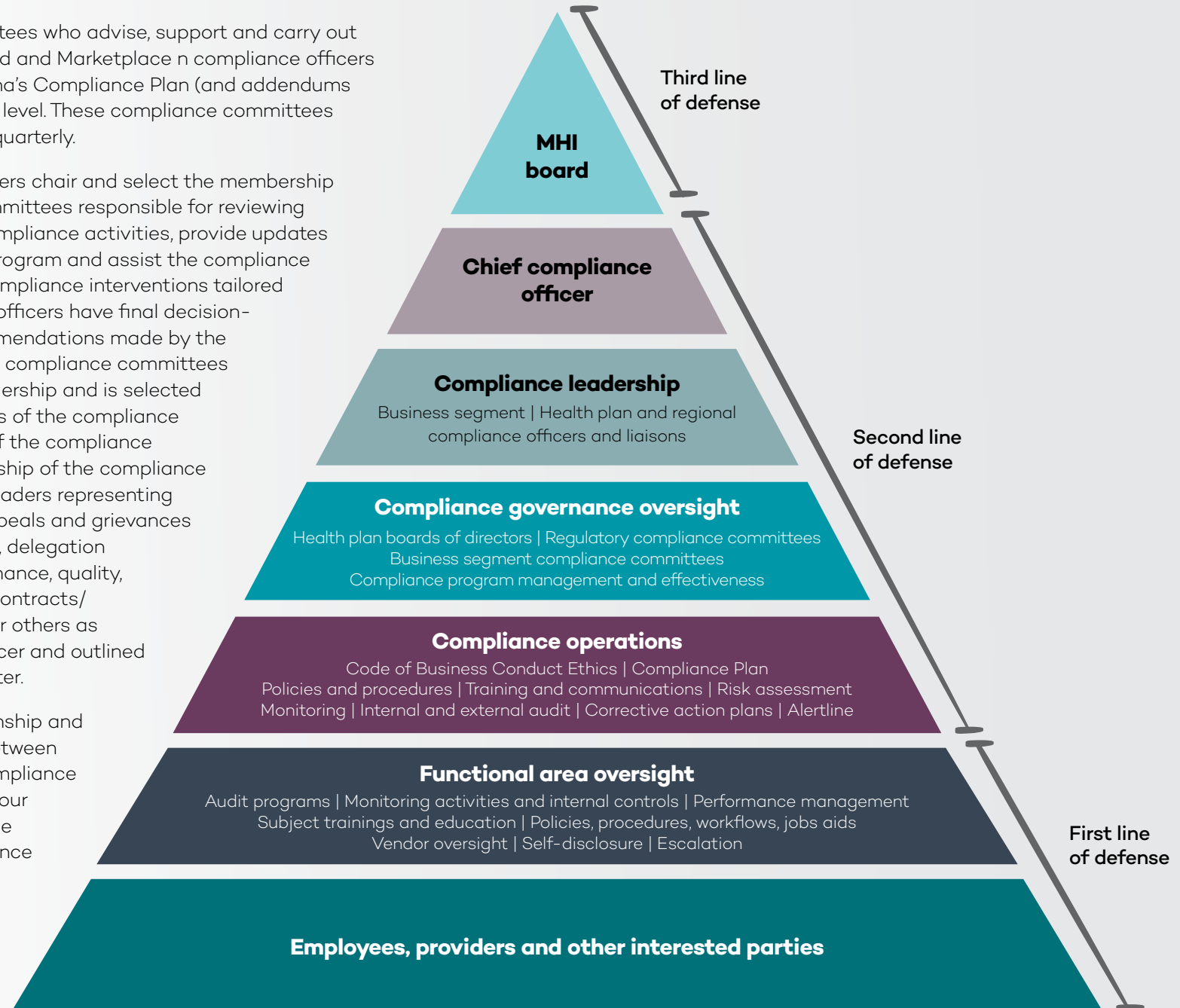


Segment Compliance Committees

There are also compliance committees who advise, support and carry out directives of our Medicare, Medicaid and Marketplace n compliance officers with respect to implementing Molina's Compliance Plan (and addendums and work plans) on a local, tactical level. These compliance committees meet as needed, but no less than quarterly.

Molina's segment compliance officers chair and select the membership of their regulatory compliance committees responsible for reviewing the status and effectiveness of compliance activities, provide updates on their own work to support the Program and assist the compliance officer in identifying meaningful compliance interventions tailored to specific needs. The compliance officers have final decision-making authority related to recommendations made by the committee. The membership of the compliance committees consists of members of senior leadership and is selected by the compliance officer. Members of the compliance committee serve at the pleasure of the compliance officer. At a minimum, the membership of the compliance committee consists of executive leaders representing operations (e.g., contact center, appeals and grievances and claims), network management, delegation oversight, member engagement, finance, quality, health care services, government contracts/regulatory affairs, medical affairs or others as determined by the compliance officer and outlined in the compliance committee charter.

This diagram illustrates the relationship and bidirectional flow of information between and through our Three Lines of Compliance Defense — from our employees to our compliance officers, the compliance committee structure chief compliance officer and the Board.





Compliance program resources

Molina's compliance program is supported by centralized compliance operations teams powered by compliance professionals specializing in compliance risk assessment and internal audits, external audits, corrective action and risk management, performance monitoring and reporting. This centralized model not only provides adequate resources to support the compliance officers in the implementation of our Compliance Plan but also leverages local input to proactively identify risk and noncompliance potentially affecting Molina as a whole, increasing the compliance program's effectiveness.

Compliance officers rely on these teams, and have access to any information, records, system, employee or other source of information necessary to fulfill their responsibilities.





EDUCATION AND TRAINING

Molina provides effective compliance training and education to our employees, so they are aware of our expectations and policies as well as their own responsibilities.

Education, training and retraining concerning compliance, program integrity matters, and program requirements or job responsibilities are regular, routine and required aspects of Molina's work activities. Education and training sessions are mandatory for all employees. Molina's training and education program relies on a combination of web-based and live trainings.

All new employees receive a copy of the Code on their first day of employment, and attest they have received, read, understood and will abide by the Code. All new employees must complete the compliance training curriculum within 30 days of their start date. New employees also receive live compliance orientation conducted by the appropriate compliance officer or their designee. After hire, all Molina employees must complete an annual compliance training curriculum. Board members are required to complete required compliance trainings within 30 days of appointment and annually thereafter. It is Molina's policy to consider timely completion of or attendance at compliance trainings as part of employee performance evaluations.

The compliance training curriculum is reviewed and updated as necessary, but at least annually. It covers, at a minimum, the following topics:

- The Code of Business Conduct and Ethics
- The Compliance Plan
- FWA, especially the False Claims Act
 - Administrative remedies for false claims and statements
 - Applicable state law
- Whistleblower protections
- Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Health Information Technology for Economic and Clinical Health (HITECH)
- The responsibility to report instances of suspected noncompliance and the alternative means of making such reports
- The importance of compliance and consequences of noncompliance (enforcement and discipline up to and including termination, as appropriate)

- The three lines of compliance defense
- Examples of employee wrong-doing and its consequences
- Current risks and how to mitigate them
- New laws, court decisions, or industry best practices
- Clarification on policies, processes or other compliance content generating frequent questions, as needed

Live trainings or trainings in alternative formats can be provided by the compliance officer or their designee, as necessary.

In addition to compliance-focused training, it is Molina's expectation that all employees be trained on program requirements and policies and procedures governing their job responsibilities at the time of hire, and when necessitated by a change in law, rule, requirement or Molina process. These trainings are provided by members of management or subject matter experts within the applicable business unit with support from the compliance officers, as necessary.

Compliance officers and department staff receive and are encouraged to individually seek out ongoing training on industry best practices and current events from internal and external sources not only as part of their professional development, but to further enhance the effectiveness of our compliance program.

Completion of required compliance trainings is tracked in Molina's learning management system and reported to compliance officers, management, and the various boards of directors on a monthly and quarterly basis, respectively. All employees who fail to meet training deadlines, along with their immediate supervisor, are referred by Compliance to the Human Resources department for performance management, which can include negative impact to performance evaluations up to and including termination, as appropriate.



MONITORING AND AUDITING

Molina's compliance program includes monitoring and auditing activities to assess compliance with state and federal requirements, proactively detect process issues or deficiencies noncompliance and validate effectiveness of remediation of noncompliance within our operations. This oversight is part of the compliance work plans that are implemented by our compliance officers.

The compliance department facilitates a centralized key performance indicator (KPI) reporting structure that is used by business areas across Molina to monitor compliance with internal and external performance targets. Business areas use these metrics to self-monitor their performance and address failures at the ground level. The compliance department uses the same metrics as an added layer of oversight and accountability, monitoring for performance trends in need of correction. This review occurs for the entire Molina enterprise, within each business segment and health plan. The chief compliance officer and executive leaders across the organization meet monthly to review KPIs that are not compliant and discuss plans to correct course. KPI results are reported to the regulatory compliance committees, business segment compliance committees and parent company and subsidiary boards of directors.

Molina also deploys proactive, targeted and regular efforts to prevent, detect and address FWA issues. This work is detailed in the FWA work plan implemented by the SIU. The delegation oversight team is responsible for oversight, monitoring and auditing of certain FDR-related entities. This can result in corrective action, enforcement of performance guarantees or termination of business relationships.

Molina's compliance committee structure is responsible for the oversight of our monitoring and auditing efforts.





Risk assessment

To ensure that Molina's compliance program and the activities that support it are effective, our compliance officers facilitate an annual compliance risk assessment of our functional and operational areas. The compliance risk assessment takes into consideration the type, implication, probability, impact, and severity of risk presented by each area to the Medicare, Medicaid and Marketplace/commercial programs, as well as to Molina and our members, providers and regulators. The risk assessment contemplates performance on internal controls and key performance indicators, internal or external threats, results of internal and external audits, initiated corrective action, compliance reports, incidents or notices of noncompliance, trends noted in ongoing monitoring and known risks or anticipated program requirement amendments for each functional area.

The results of the risk assessment are used to inform compliance internal audit work plans that include the type and schedule of audits of functional areas planned for the year. The compliance internal audit work plan is executed by the internal compliance audit department at the discretion of the compliance officers. The risk assessment results are also used by our compliance officers to structure compliance work plans that outline compliance activities for the year, like department-specific trainings, new corrective action or remediation plans, new or updated internal controls to monitor risk development or remediation, enhancing communication with employees or reports shared with leadership. The compliance internal audit work plan is part of the compliance work plan.

Compliance officers are responsible for implementing work plans and reporting on their status within the compliance committee structure. Compliance officers disclose noncompliance or illegal conduct to regulators or law enforcement agencies, as required.

Auditing and monitoring activities

Molina uses auditing and monitoring to proactively identify areas of compliance deficiency, respond to reports of suspected noncompliance, and assess continued compliance and the effectiveness of corrective measures implemented to address deficiencies. Molina conducts these activities for each functional area as well as the Medicare, Medicaid and Marketplace/commercial business segments.

Auditing and monitoring might be performed on a formal or informal basis at the discretion of the compliance officer. These activities can be completed through several methods, including, but not limited to:

- Desk audits
- Surveys
- Interviews
- Document audits
- Phantom member claims or inquiries
- Phantom provider claims or inquiries
- Audits of business unit audit methodologies and field work and
- KPIs

The compliance officers have the discretion to initiate auditing and monitoring in all areas involving compliance, including, but not limited to:

- Claims payment timeliness and accuracy
- Utilization management
- Care coordination
- Customer service
- Appeals and grievances
- Sales agent activities
- Implementation of new program requirements
- Risk adjustment
- Quality reporting on the overutilization or underutilization of services

The results of Molina's auditing, monitoring or investigational activities are maintained by the compliance program and shared with the associated board of directors, compliance committees and management, as appropriate.





Screening for excluded, suspended or terminated individuals and entities

Employees, board members, third-party employees and contractors

Molina is committed to hiring qualified individuals and maintaining our culture of compliance. Molina completes pre-employment background checks on **all** applicants prior to employment and does not hire individuals who have been found guilty of a health care-related crime, or individuals who are suspended, excluded or debarred from participation in state and federal health care programs. This includes a check of suspension and exclusion lists maintained by the United States DHHS OIG General Services Administration (GSA) the CMS Preclusion List as well as every suspension and exclusion list maintained by state Medicaid agencies to determine if any applicant, employee, board member, owner, provider, or contractor is ineligible to participate in state and/or federal health care programs.

Once hired, all employees, board members, third-party employees and contractors are screened against all exclusion lists monthly. Human resources report the results of these screens monthly.

Molina reviews any issues that are flagged in the report and takes appropriate action should an issue be identified and/or deemed unresolvable, which could result in appropriate action including termination, removal from position or suspension pending investigation and resolution of the matter.

Employees **must immediately** disclose to human resources and their supervisor any debarment, exclusion or other event that makes them ineligible to perform work related directly or indirectly to federal or state health care programs. Failure to do so could result in corrective action up to and including termination.

Providers, subcontractors and FDR entities

Molina conducts these same screenings during the process of engaging the services of new vendors, network providers and subcontractors, including agents, and at least monthly thereafter. It's our policy not to engage or pay for the services of an individual or entity that is debarred, suspended or excluded from participation in state and federal health care programs. Molina's credentialing, procurement, sales and operations teams are responsible for monitoring the exclusion lists as part of their day-to-day functions. If we find that inappropriate payment has been made to an ineligible individual or entity, steps are taken to prevent similar payments from being made, recover those funds and disclose the payment, as required.

Clinical licensure and scope of practice

Molina employs many clinicians who play crucial roles in our operations. To make sure we have qualified individuals serving our members and providers, we also monitor the licensure status of our clinical staff to ensure these key team members are working within their scope of practice and with a license in good standing with its governing body. Failure to renew the necessary license, certification or registration prior to the expiration date could result in termination of employment.



Conflicts of interest

Molina expects **all** employees to make decisions objectively and act in our best interests. A conflict of interest exists when:

- An employee's duty to act in Molina's best interests is or can be compromised by actual, potential or perceived benefit to that employee (other than a nominal one) 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.

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

Employees are expected to avoid situations where personal or other professional interests could conflict with those of the Company and must report any perceived or actual conflict. Failure to disclose a conflict promptly, accurately, and completely could result in corrective action up to and including termination.

More specifically, **all** employees have a duty to report and disclose **all** relevant information related to an actual, potential or perceived conflict of interest by completing Molina's Conflict of Interest Form. This reporting **must** be made upon hire, as an annual update and ongoing basis as an employee's circumstances create the potential for a conflict of interest. In addition, **all** employees must attest, at least annually, to the requirements and obligations in this policy through the annual Molina compliance training and attestation process.

If an actual, potential or perceived conflict exists, the human resources and/or compliance department(s) works with the involved employee and, when necessary, with the employee's immediate supervisor and/or other member(s) of Molina's management to ensure timely and effective resolution to avoid or mitigate the conflict of interest. Any necessary research is performed and, where appropriate, a plan for resolution and/or mitigation as well as a timeline are developed. To the extent practicable, confidentiality shall be maintained by Molina's human resources and compliance departments, management and any other employee(s) whose assistance is sought in achieving effective resolution of a potential or actual conflict of interest. Molina is committed to taking appropriate action to address conflicts, which could include soliciting written representation of agreement from employees about the plan for resolution or mitigation, prohibiting certain arrangements or behavior, issuing corrective action or terminating employment. For more information, please review Molina's Conflicts of Interest policy.





EFFECTIVE LINES OF COMMUNICATION

In order for Molina to be able to respond quickly, effectively and thoroughly to any potential compliance and/or fraud, waste, or abuse issues, it is essential to establish and maintain effective lines of communication, ensuring confidentiality between the compliance officer and their designee and employees, members, and first tier, downstream, and related entities, agents, directors, the applicable compliance committee, Molina leadership and the Board. Molina's employees are our first line of defense against noncompliance and unethical behavior. All employees are made aware of their responsibility to promptly report any suspected noncompliance, privacy or security violations, potential misconduct and allegations of potential FWA and to raise any issues, questions or concerns so that those matters can be investigated and acted upon as necessary. We understand that raising concerns like this might be difficult, but **it is absolutely necessary**. We **cannot** address issues that are not reported.

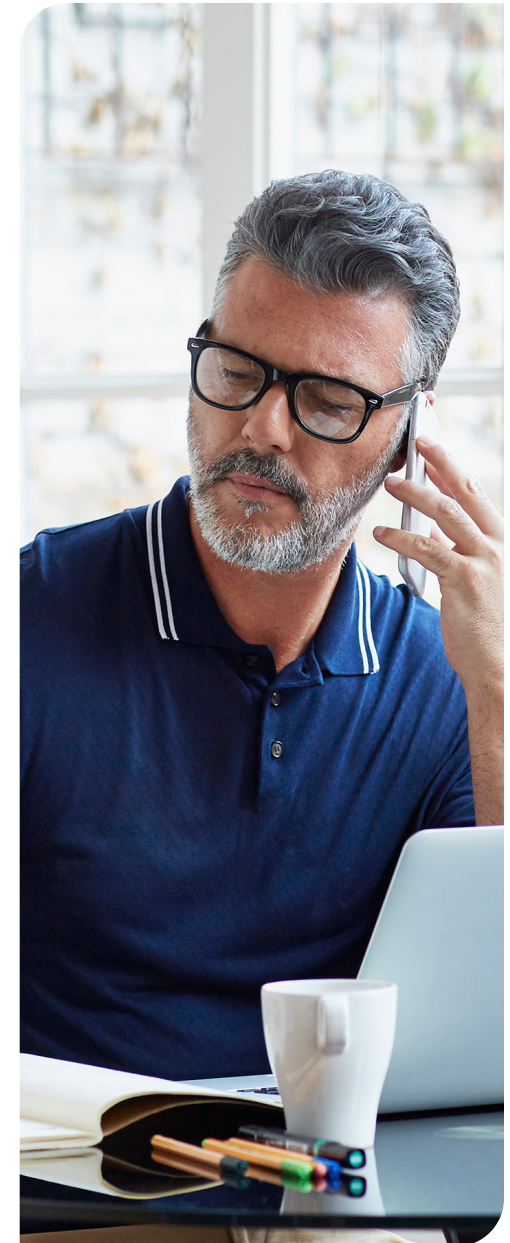
Molina expects its leaders to operate with an open-door policy, and welcome reports, questions and concerns with an open mind. We accept and respond to every report. To that end, we provide our employees with many reporting methods, including, but not limited to our confidential and anonymous AlertLine — where reports can be made to a toll-free phone line or publicly accessible website. We also have dedicated compliance, privacy, security and payment integrity teams and an open-door policy of both corporate and plan-level compliance personnel for more personal reporting.

Our Code of Conduct and Business Ethics establishes the responsibility of each employee to **immediately** escalate any suspected incidents of noncompliance or violations. Individuals failing to report a suspected violation will be subject to Molina's disciplinary standards, up to and including termination.

Reports related to suspected compliance, privacy, security or FWA issues can be made:

- Directly to the compliance officer:
 - By phone
 - Teams meeting or message
 - Email
- Using Molina's 24/7 third-party compliance reporting system, AlertLine, which allows the caller options to provide their name or report anonymously or confidentially
 - To report by phone, call **(866) 606-3889** toll free
 - To report online:
MolinaHealthcare.Alertline.com
- To any member of the compliance committee, human resources, legal or any member of management
- To our privacy or security officials
- Using contact information for state or federal government agencies responsible for investigating suspected FWA
 - Contact information for local FWA contacts can be found in the relevant Compliance Plan Addendum and relevant human resources policies

Because Molina's AlertLine is publicly accessible, it can be used by **anyone** who suspects compliance issues, unethical behavior or FWA — including employees, members, providers, subcontractors, and other interested parties. Molina's provider network is trained on the use of the AlertLine. This information can be found in provider training materials, provider handbooks and on our website.





Equal employment and anti-discrimination

Molina **does not** tolerate intimidation or retaliation for reports made in good faith, including bringing perceived inappropriate conduct to Molina's attention, attempting to prevent unlawful conduct or for participating in an investigation by Molina, a state agency, or the United States Equal Opportunity Commission (EEOC). This may include, but is not limited to, reporting potential issues, investigating issues, conducting self-evaluations, audits, and remedial actions, and reporting to appropriate officials. Employees are encouraged and expected to report perceived retaliatory behavior to their management team and/or human resources. Any person who is found to have engaged in retaliatory behavior will be subject to disciplinary or corrective action, up to and including termination. Molina's policy also protects members or providers who have made reports of suspected wrong-doing from retaliation and intimidation.



PROMPT RESPONSE TO COMPLIANCE ISSUES



It's Molina's policy that our compliance officers conduct timely and reasonable investigations of potential compliance matters to determine whether a violation of policy, applicable law, regulation, contractual requirement or the compliance program has occurred and ensure the organization has taken **all** appropriate steps to correct any wrongdoing. Molina investigates any potential misconduct, noncompliance or fraud, waste, or abuse, including matters related to payment or delivery of items or services.

Reporting suspected noncompliance is **everyone's** job. Compliance can be alerted to potential noncompliance by many sources, including, but not limited to, a leader's self-disclosure of an issue or a report from another department, a complaint from a member or provider, internal or external audit findings, results of monitoring activities like KPI reporting, AlertLine allegations or a communication or noncompliance action from a regulator. Compliance officers, with the support of compliance operations, are responsible for the initiation of corrective action plans to minimize the risk of reoccurrence of any deficiency, no matter how it has been discovered.

Molina does not consider corrective action plans to be punitive. Rather, we use them to document our detection of a deficiency and how we proactively took appropriate action to ensure its remedy. All our corrective action plans are recorded in Compliance Central. Owners of corrective

action are assigned in Compliance Central where they document their root cause analysis and results, plan different remediation steps, establish deadlines for each step, and provide evidence that the corrective action plan has been completed and is effective in fixing the issue. The executive leader of the department in which the noncompliance occurred is ultimately responsible for developing and executing a corrective action plan that is appropriate for the circumstances and the structure of the business unit(s) involved. Once a corrective action plan is complete, compliance monitors its effectiveness before it closes. Depending on the deficiency, compliance might conduct a thorough validation review to ensure the issue is completely remediated.

Information on the development, execution and timeliness of corrective action is reported to executive leadership, the appropriate compliance committee, board of directors and/or Regulatory Compliance Committee. Compliance officers must also make reports, as necessary, to the appropriate regulatory entities. These reports can include self-disclosure of noncompliance, or repayment of funds, depending on the issue.

Where appropriate, individuals with specific investigative expertise in the management of fraud investigations are utilized to investigate instances of suspected fraud. Compliance officers may designate or maintain standing contracts with such individuals for that purpose.



ENFORCEMENT AND DISCIPLINE

Molina has high expectations for all our employees, which at a minimum include following the Code and complying with federal and state requirements as well as Molina policies. These expectations, including the responsibility to report suspected compliance issues and participate in their correction, are established in our compliance disciplinary standards and human resources policies and procedures. All employees have access to these documents via the Hub.

Corrective action is not required in instances of noncompliance only. Molina's disciplinary standards apply to every employee at every level of our organization. It's our policy to apply our disciplinary standards and corresponding corrective action fairly and consistently to employees whose conduct or performance conflicts with our Code and/or deviates from company rules, program requirements and other standards, including, but not limited to regulatory contract requirements and federal, state and local laws, rules and regulations.

In the event a Molina employee's actions result in noncompliance, they could be subject to corrective disciplinary action, up to and including termination. In addition, the violation of certain laws and/or regulations might require Molina to report the violation to a regulatory or law enforcement agency or their designee, and/or could subject the employee to criminal prosecution as well as civil penalties that involve substantial monetary fines.

Partnering with human resources

Disciplinary action, if any, is reviewed by human resources for appropriateness, consistent with the Molina human resources corrective action policy and documented in the involved employee(s) personnel file(s). Human resources and compliance regularly collaborate to improve adherence to compliance standards and ensure that disciplinary actions related to compliance matters imposed on employees are applied in a fair, consistent and appropriate manner. The collaboration includes, at a minimum, strategic joint initiatives, a review of trends in disciplinary actions and case review of disciplinary actions related to compliance, privacy and cybersecurity issues.





PRIVACY AND SECURITY

Molina's business is based on the trust of our members, regulators and industry health partners. We are trusted to handle the most sensitive and private information in a secure and professional manner. Molina is committed to satisfying federal and state requirements that protect the privacy and confidentiality of our members' and providers' information, and to continuously enhancing and strengthening our technology and security protocols.

Molina's privacy official implements and oversees our privacy Compliance Plan, which includes policies concerning our approach to maintaining the confidentiality and privacy of protected health information (PHI), personally identifying information (PII) and other sensitive information used by Molina in accordance with federal and state laws, regulations and contractual obligations to conduct our business, as well as protecting any records, documents or information containing PHI or PII from improper use and unauthorized disclosure.

Any unauthorized use or disclosure of PHI must be immediately reported to Molina's privacy official at **(866) 665-4629** or HIPAAMailbox@MolinaHealthcare.com.

Molina's security official implements and oversees policies to ensure that electronic PHI is secured during storage and use, and to safeguard our data from being compromised by bad actors.

Any cybersecurity event, such as any act or attempt — successful or unsuccessful — to gain unauthorized access to, disrupt or misuse Molina's information systems or confidential information, including PHI or PII, must be immediately reported to Molina's chief information security officer at **(844) 821-1942** or CyberIncidentReporting@MolinaHealthcare.com.





THIRD-PARTY OVERSIGHT

Molina conducts its business with an unwavering commitment to compliant and ethical conduct. The Code provides a detailed roadmap to that commitment, and it applies to subcontractors, vendors and other stakeholders. It's our absolute expectation that we conduct business in accordance with federal and state requirements, as well as ethical and professional business practices. We hold our suppliers to the same standards.

Molina's delegation and vendor oversight programs are responsible for determining a potential business partner's readiness to handle business functions on our behalf. Once third-party relationships are established, Molina strives for operational excellence. Regular communication occurs to ensure high levels of performance, address identified concerns, and resolve opportunities for improvement. Vendor performance is monitored through regular assessments based on predefined KPIs and service level agreements (SLAs) to ensure agreed-upon standards are met. Failure to meet those standards are addressed appropriately, through corrective action, up to and including termination of the business relationship.

FRAUD, WASTE AND ABUSE

Molina plays a crucial role in programs funded by state and federal governments. Therefore, we have a duty to assist regulators and law enforcement agencies charged with protecting communities and taxpayers from FWA that can occur in our health care system. Molina's FWA plan and annual fraud audit work plan include a specialized assembly of administrative, management, training and data-driven strategies managed by our SIU, and are focused on preventing, detecting and correcting provider and member FWA in support of Molina's initiatives to deliver high-quality health care to our members. Molina's payment integrity and FWA plan captures claims payment controls as well as FWA detection, investigation and prevention practices. The FWA plan and annual fraud audit work plan complement the Compliance Plan.

The SIU reports on the status and outcome of their work to the compliance officers, who are the accountable points of contact for program integrity and relay this information to senior leadership, compliance committees and regulators as required.

Allegations of suspected FWA can be reported to Molina's compliance officers and SIU for review and investigation via the AlertLine, which can be accessed by phone toll free at **(866) 606-3889** or online at MolinaHealthcare.Alertline.com.



COMPLIANCE OVERSIGHT AND GOVERNANCE TOOL

To ensure efficient and effective compliance program implementation, administration and governance, Molina operates a compliance oversight and governance tool — Compliance Central. Compliance Central is a cloud-based platform used by the Molina compliance department and other stakeholders to manage day-to-day compliance activities, such as audits and corrective action plans. It also serves as a platform for employees to view key compliance documents, such as state contracts or policies and procedures. Key modules available in Compliance Central include:

- Government contracts library
- Policy and procedure library
- Internal audits
- External audits
- Issue management
- Corrective action plans
- Regulatory library
- Reports filing tracker

In Compliance Central, our compliance officers and other Molina leaders can oversee and view compliance matters and incidents and monitor many aspects of compliance incidents in real time.





CONCLUSION

Our Compliance Plan is intended to help promote an understanding of how Molina's Compliance Program works and why our employees' role as our first line of defense is so important. Our Compliance Program cannot succeed with our employees' dedication to working with **Integrity Always**.

QUESTIONS

Any questions or concerns pertaining to the Code, the Compliance Plan, or any of Molina's policies and procedures and/or federal or state requirements should be directed to the compliance department or chief compliance officer, or legal department or chief legal officer. Questions and concerns can be submitted through the AlertLine by calling **(866) 606-3889** toll free or visiting MolinaHealthcare.Alertline.com.

Employees seeking assistance must act in accordance with the guidance and advice they receive.

Thank you!



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