

Manual Section:	Corporate Policy and Procedures, HR, Associate Relations	
Policy Name:	Equal Employment Opportunity Policy	
Policy Number:	C2-EP-002	
Effective Date:	12/01/2001	Page 1 of 6
Lines of Business and Applicable State(s)	All	
<i>Electronic Approvals are located in C360</i>		

Purpose:

WellCare Health Plans, Inc., and its subsidiaries (“WellCare” or the “Company”) seek to establish a uniform policy to ensure appropriate use, dissemination and understanding of the Company’s Equal Employment Opportunity, Reasonable Accommodation and No Harassment Policy.

Scope:

WellCare is committed to a policy of equal employment opportunity, reasonable accommodation and no harassment or discrimination in all aspects of employment, including, but not limited to recruitment, hiring, compensation, benefits, training, promotion, demotion, transfer, layoff, termination and all other terms and conditions of employment. No person shall be discriminated against in employment because of race, color, religion, creed, age, sex, pregnancy, veteran status, marital status, sexual orientation, gender identity or expression, national origin, ancestry, disability, genetic information, childbirth or other legally protected basis protected by applicable federal or state law except where a bona fide occupational qualification applies.

The Company requires all associates to comply with all aspects of this Policy. All associates, regardless of position or title, will be subject to severe discipline, up to and including termination, should the Company determine that an associate is engaged in the unlawful discrimination, harassment, or retaliation of another individual or has otherwise failed to comply fully with this Policy.

WellCare Provides Reasonable Accommodations

It is WellCare's policy to provide reasonable accommodation to individuals with disabilities who are otherwise qualified to perform the essential functions of their position, with or without accommodation, and due to an individual's sincerely-held religious beliefs, unless such accommodations would impose an undue hardship on the Company.

A reasonable accommodation may be a change in the work environment or in the way a job is performed that enables a person with a disability or sincerely-held religious beliefs to enjoy equal employment opportunities.

Requests for reasonable accommodations should be made to the Leave Administrator. The Company may require documentation in order to confirm the nature of an associate's disability or religious beliefs and to help the Company identify the appropriate accommodation, including, but not limited to, medical certification when an accommodation is requested because of a disability. Although the Company will attempt to provide an associate's requested accommodation, the Company is not always able to do so. WellCare reserves the right to provide an alternative reasonable accommodation that is effective at removing the workplace barrier in question and to not provide accommodation when doing so would pose an undue hardship on the Company's business.

WellCare Will Not Tolerate Discrimination

WellCare will not tolerate discrimination, harassment or retaliation of its associates. Associates who believe they have been subjected to any form of harassment or discrimination are expected to immediately notify Human Resources. The Company strictly prohibits any acts of retaliation against associates who, in good faith, report or complain about discrimination or harassment in the workplace. Associates who knowingly make false or malicious claims against other associates will be subject to corrective action up to and including termination.

Harassment-Free Work Environment

WellCare is committed to providing a work environment that is free from harassment, including sexual harassment, and will not tolerate harassment of any kind. Harassment includes, but is not limited to any verbal, physical or visual harassment based on race, color, religion, creed, age, sex, pregnancy, veteran status, marital status, sexual orientation, gender identity or expression, national origin, veteran status, ancestry, disability, genetic information, childbirth or related medical condition or any other factor protected by law.

Our Harassment-Free Work Environment Policy applies to all associates, temporary employees, contractors, vendors or others who come in contact with Company associates in the course and scope of their duties. The company prohibits any type of unacceptable conduct.

Examples of unacceptable conduct include, but are not limited to:

- Threats or promises of benefits in exchange for sexual favors or implying that things will go smoothly in exchange for sexual favors
- Unwanted sexual jokes, flirtations, advances or propositions or obscene comments or gestures
- Unwanted or suggestive touching, impeding or blocking movements, leering or whistling

- The display, viewing or circulation in the workplace of derogatory phrases, jokes, objects, posters, cartoons or pictures (including through e-mail)
- Verbal commentary or abuse
- Negative stereotyping

These types of behaviors are unacceptable at all WellCare offices, in other work settings, such as business trips, at business-related social events and at non-business-related social events with associates in attendance. All Company associates, and particularly those in a managerial position, have a responsibility for keeping the environment free of any kind of harassment.

Reporting Procedures and Associate Responsibilities

WellCare must be made aware of discrimination, harassment or retaliation before it can act to prevent or stop it. The Company cannot take corrective action unless it has knowledge that a problem exists. Any incident or situation that an associate believes violates the Harassment-Free Workplace Policy should immediately be brought to the attention of the Human Resources Department. It is also recommended, but not required, that the associate firmly and promptly notify the offender that his or her behavior is unwelcome. Reports of harassment, discrimination or retaliation will be investigated and the confidentiality of those involved will be maintained to the extent practical under the circumstances.

Associates at any level who violate the Harassment-Free Workplace Policy will be subject to disciplinary action, up to and including termination. Any manager who is aware of a violation of this policy and takes no action to report it will be subject to disciplinary action as well.

While this policy sets forth WellCare's standard for promoting a workplace that is free from discrimination and harassment, the Harassment-Free Workplace Policy does not limit WellCare's authority or ability to discipline or take any other remedial action for workplace conduct that the Company finds inappropriate, regardless of whether that conduct meets the legal definition of discrimination or harassment.

No Retaliation

No individual will be subject to, and it is WellCare's policy to strictly prohibit, any form of discipline or retaliation for reporting, in good faith, any incident or situation of discrimination or harassment.

Furthermore, any associate pursuing a claim of discrimination or harassment, participating or cooperating in any investigation of a complaint of discrimination or harassment should not be subject to retaliation. Retaliation is a serious violation of this policy and should immediately be reported to Human Resources. Any person found to have retaliated against another individual will be subject to disciplinary action, up to and including termination. Any individual who intentionally makes a false claim of discrimination or harassment may be subject to discipline, up to and including termination.

Questions

Questions about this Policy, or its application to any situation, should be directed to Human Resources.

Definitions:

Background:

Business Rules:

Supporting Guidance/Legal and Regulatory References:

Record Retention:

Wellcare must retain all records created in connection with this Policy. Associates should review, and must comply with, the Records and Information Management Policy (C13RIM.001), the Review and Maintenance of Records Retention Schedule (C13RIM.001.003-ST), and any applicable Document Hold Orders issued by the General Counsel or his/her designee.

Reporting Questions/Assistance:

If you are aware of a situation that you believe may violate this Policy, you must promptly contact an immediate supervisor, WellCare's Chief Compliance Officer, a member of the Corporate Compliance Department, the General Counsel, the Human Resources Department or the Chief Financial Officer or Audit Committee. Reports may also be submitted anonymously through the iCare Compliance Hotline at 1-866-364-1350 or through the iCare Compliance Webportal via WellCare Link, except where limited by law. See the policy on Reporting Compliance Issues to the Compliance Program-Confidentiality and Non-Retaliation (C13CP-003) and the policy on Reporting Compliance Issues and Non-Retaliation (C2ER-015). In addition, if you have any questions or concerns about this Policy, you may raise them with the individuals identified above, through the iCare Compliance Hotline or through the iCare Compliance Webportal.

Discipline:

Failure to comply with this Policy, and applicable laws or regulations, will result in the imposition of disciplinary measures in accordance with the policy on Corrective Action Process (C2ER-004).

Policy History:	Reviewed and revised Reviewed and revised: 10/09/2017 Reviewed and revised: 01/05/2016 Reviewed and revised: 11/05/2014 Reviewed and revised: 07/17/2013 Reviewed and revised: 06/22/2011 Reviewed and revised: 06/23/2010
Prior Policy Number(s):	C2EP 03-04
Related Procedures:	

State Specific Addenda:

Check all that applies			
<input type="checkbox"/> Arizona	<input type="checkbox"/> Hawaii	<input type="checkbox"/> New Jersey	<input type="checkbox"/> Missouri
<input type="checkbox"/> California	<input type="checkbox"/> Illinois	<input type="checkbox"/> New York	<input type="checkbox"/>
<input type="checkbox"/> Florida	<input type="checkbox"/> Kentucky	<input type="checkbox"/> South Carolina	
<input type="checkbox"/> Georgia	<input type="checkbox"/> Louisiana	<input type="checkbox"/> Texas	

Missouri Addenda:

Policy Name:	Equal Employment Opportunity and Non Discrimination
Policy Number:	MO 29 HR AR 001
State Approval Date:	06/29/2015

Addenda History:	N/A
-------------------------	-----