

CODE OF CONDUCT

The Universal American Code of Conduct contains the company's expectations of each employee to ensure his or her job is done in an honest, ethical and lawful way.

Each of us must:

- **Avoid Conflicts of Interest**

Even if there is just the appearance of a conflict of interest, it may harm the reputation of the company.

- **Guard Confidential Information**

We must take extra steps to safeguard our members' private information. Do not discuss private information with co-workers. Do not store private information on portable devices.

- **Direct Inquiries from the Public to the Right Person**

Employees are not allowed to answer questions from the media, analysts, investors or other members of the public. If you receive such a question, record the name and contact data and provide it immediately to your supervisor.

- **Meet All of Our Regulatory and Compliance Responsibilities**

If you have any ethical, regulatory or legal questions, consult an appropriate supervisor or your compliance officer.

The Company will not tolerate any retaliatory actions against those who report potential non-compliance.

Fraud/Waste/Abuse & Ethics Hotline

1-800-388-1563

To file a report online, go to: www.tnwgrc.com/UniversalAmerican
For Universal American's complete Code of Conduct, visit the Compliance page of the UAM Intranet at: portal.UniversalAmerican.com/compliance