

**UNITEDHEALTH GROUP  
POLITICAL CONTRIBUTIONS POLICY  
(November 3, 2011)**

**Overview**

The Company's mission is to help people live healthier lives. Public policy affects our ability to fulfill that mission, meet customer needs and provide shareholder value. Our nation is currently engaged in a significant and critical debate over how to provide every citizen with better health care. The Company has engaged and will continue to engage in public policy activities, including political contributions that have the potential to improve the delivery of health care and affect our business, employees and communities in which we operate. The Company's Board of Directors has adopted this Political Contributions Policy to ensure that any such contributions are made in a manner consistent with the Company's mission and/or shareholder interests.

*Federal Level*

Federal election laws limit the Company's ability to provide monetary or in-kind contributions to federal candidates, political parties, political committees, or any other entity in a federal election. The Company expects all employees to comply with federal election laws. Political contributions to federal candidates, political parties, and political committees are, however, lawfully made by one or more bipartisan political action committees ("PACs") sponsored by the Company. The Company-sponsored PAC is voluntarily funded with employees' personal money only. Only eligible employees are asked to consider supporting any Company-sponsored PAC.

*State/Local Level and Other Political Organizations*

Some state and local jurisdictions permit companies to contribute to state and local candidates, political parties, political committees, referenda and ballot initiatives. Political contributions at the state and local level may be made directly by the Company or by PACs organized by the Company under state election law. Any PAC established in a particular jurisdiction shall be funded in accordance with applicable state law. In addition, under certain circumstances, the Company or its PACs may contribute to other political organizations and make other political expenditures permitted by law. Generally, the Company contributes to those candidates or initiatives that are consistent with our long-term legislative and regulatory goals, and to those who represent the communities served by our Company.

**Definitions**

For purposes of this policy:

The "Company" includes UnitedHealth Group Incorporated and its majority-owned subsidiaries.

"Policy" means this Political Contributions Policy.

A “political contribution” is any gift, loan, advance or deposit of money or anything of value, made: (a) for the purpose of influencing any election for federal, country, state or local office or a ballot initiative; or (b) to pay debt incurred in connection with any such election or ballot initiative.

### **Scope**

This policy applies to political contributions made by the Company and its Political Action Committees.

### **Oversight**

The Public Policy Strategies and Responsibility Committee (the “Committee”) of the Board of Directors monitors compliance with this policy. Management will report at least semi-annually to the Committee regarding political contributions made by the Company and its PACs pursuant to this Policy, including the purpose and benefit of the political contributions.

### **Policies and Procedures**

All political contributions made by the Company must (1) comply with all applicable laws and regulations in the jurisdictions in which the contributions are made (including the United States Foreign Corrupt Practices Act); and (2) adhere to this policy and the UnitedHealth Group Code of Conduct: Our Principles of Ethics & Integrity. Any political contribution made by the Company must be approved in advance by the Company’s office of the Senior Vice President for Government Affairs and the Corporate Legal Department. In addition to these approvals, political contributions in excess of \$200,000 to a single candidate, party, committee, referendum, or ballot initiative in a calendar year must also be approved in advance by the Senior Executive responsible for Government Affairs. The Committee may, by resolution, establish an annual aggregate spending limit for political contributions made by the Company.

All political contributions must reflect the Company’s interests and not those of its individual officers or directors. No contribution will be given in anticipation of, in recognition of, or in return for an official act.

The Company will not reimburse employees in any way for personal political contributions. Furthermore, the Company will not pressure or coerce employees to make personal political contributions, will not favor those employees who do make personal political contributions, and will not take retaliatory action against employees who do not make political contributions.

### **Disclosure**

To demonstrate transparency, the Company will publish a semi-annual disclosure report on its website, disclosing the following political contributions made in the United States:

- corporate contributions to state candidates;
- corporate contributions to state party committees;

- corporate contributions to state ballot initiatives;
- federal PAC contributions to candidates;
- federal PAC contributions to party committees;
- federal PAC contributions to leadership PACs;
- state PAC contributions to candidates;
- state PAC contributions to party committees; and
- state PAC contributions to leadership PACs.

The Company will request trade associations that received dues from the Company totaling \$50,000 or more in a given year to report the portion of the Company's dues used for contributions that if made directly by the Company would not be deductible under Section 162(e)(1)(B) of the Internal Revenue Code. The information received from these trade associations will be included in the semi-annual disclosure report published on the Company's website.

Prior to the semi-annual disclosure report's publication on the Company's website, the report will be presented to the Committee for review.