

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 Human Resources. 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.

Roles and Responsibilities:

N/A

References:

N/A