

Policy Regarding Inside Information and Confidentiality

Important federal legislation exists prohibiting insider trading and "tipping" inside information, subjecting employers of those who engage in such illegal acts to potential sanctions. As a result, the Company wishes to remind all personnel of its policies regarding inside information and confidentiality. Any violation of these policies may result in immediate dismissal and may subject the individual involved to both civil and criminal penalties. This is an extremely important matter and we urge you to read the following with care.

Prohibitions Against Trading on or Tipping Inside Information

Federal securities laws generally prohibit the use of material inside information by any person in purchasing or selling securities, as well as the communication of such information to any other person for such use. Material information is any information that a reasonable investor would consider important in determining whether to buy, sell or hold securities. Inside information is information that has not been effectively disseminated to the investing public.

It is the policy of the Company that material inside information concerning the Company, as well as any other corporation or business about which personnel of the Company obtain material inside information, may not, directly or indirectly, be used by Company personnel in purchasing or selling any securities (including a stock plan transaction such as an option exercise, gift, loan or pledge or hedge, contribution to a trust, or any other transfer). It is also the Company's policy that all inside information concerning the Company--or, for that matter, any other corporation or business--which is obtained by Company personnel in

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the course of their employment may not be communicated to any other person (including relatives, friends or business associates, and regardless of the purpose for which such communication may be made), except to the extent necessary to perform work for the Company.

A determination as to whether information is material or is inside information depends on all of the related facts and circumstances. Information you should consider material includes but is not limited to earnings estimates, changes in previously released earnings estimates, significant merger, acquisition or divestiture proposals or agreements, major litigation, significant product news, dividend changes and extraordinary management developments. In addition, it should be emphasized that material information does not have to relate to a company's business; information about the content of a forthcoming publication in the financial press which is expected to affect the market price of a security could well be material.

Confidentiality

All internal information concerning the Company, and any other corporation or business about which Company personnel obtain information in the course of their employment, must be kept strictly confidential and should not be discussed with any other person inside or outside of the Company, except to the extent necessary to perform work for the Company, nor should such information be discussed with any person within the Company under circumstances where it could be overheard. Written information should be appropriately safeguarded and should not be left where it may be seen by persons not entitled to that information. The unauthorized disclosure of such information could result in serious consequences to the Company, whether or not such disclosure is made for the purpose of facilitating improper trading in securities of the Company or such other corporation or business.

In addition to other circumstances in which it may be applicable, this confidentiality policy must be strictly adhered to in responding to inquiries about the Company made by the press, financial analysts or other members of the financial community. It is important that responses to any such inquiries be made on behalf of the Company by a duly designated officer. Accordingly, Company personnel should not respond to such inquiries unless expressly authorized to do so.

We expect all Company personnel to abide by the foregoing policies and procedures. Again, it should be emphasized that any violation may result in serious legal difficulties and may constitute grounds for disciplinary action, including termination of employment. Any questions concerning the policies and procedures set forth herein should be directed to the Company's Law Department and any inquiries made about the Company by persons outside the Company should be directed to the Company's Investor Relations Department. You should not try to resolve any uncertainties on your own.

Humana Inc.

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