



## Code of Ethics and Principles of Conduct

Compliance matters.  
Every decision. Every day.

**Together, all the way.®**



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# Our commitment to integrity

## Cigna's Code of Ethics and Principles of Conduct

Every day, we ask our customers and clients for their trust – trust in our ability to meet their needs, provide excellent service and keep their information safe. To me, earning their trust means we must act ethically in everything we do.

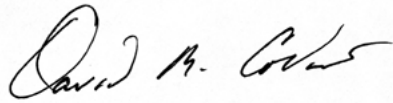
Delivering the highest-quality customer service on a global scale is no small task. The world is changing – customer needs are changing, and our industry is more competitive than ever. Cigna is up to the challenge. We have the capabilities, skills, passion – and, most important, the people – to help our customers live better lives.

Cigna's Code of Ethics and Principles of Conduct are the foundation for our unwavering commitment to integrity, legal compliance and ethical conduct. They are a “real-world guide” to the behaviors and Principles of Conduct we embody as a team that is committed to improving the health, well-being and sense of security of millions of people around the world. And, they apply to you – as a member of the Cigna team – regardless of your role or location.

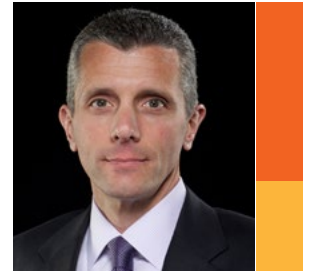
Ultimately, we must serve our customers, stakeholders, communities and each other honestly, fairly and with absolute transparency. I am proud to work beside dedicated professionals who are committed to conducting business ethically. That's the high standard we set for ourselves.

My ask is that you continue to act with integrity in all of your interactions – every day. Remember, when we do that, we win – and so do our customers.

Thank you for your unwavering commitment to doing the right thing for yourself, for Cigna and for our millions of customers, clients and partners.



David M. Cordani  
President and CEO, Cigna Corporation



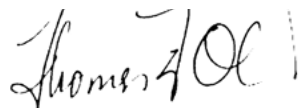
Being ethical, acting with integrity, and doing the right thing are at the core of being a customer-centric organization. Our mission and brand promise are commitments to our customers, clients and regulators, and these critical relationships are built on trust.

Each of us is responsible for helping to shape Cigna's culture by acting in accordance with our mission as well as our Code of Ethics and Principles of Conduct, ensuring that Cigna fulfills its mission in a compliant and ethical manner. This is a responsibility in which we all take pride, as it is a critical aspect of our efforts to keep our customers' needs at the heart of all we do.

The Code is built on our mission and core values, and affirms the principles and professional standards that already exist within our organization. While each of us is engaged daily in meeting competitive challenges and embracing opportunities to move our company forward, the pressure to succeed can never be an excuse to compromise our values. Our shareholders and those we serve expect and deserve nothing less than the highest levels of service and ethical behavior.

I am personally committed, as is every member of Cigna's leadership team, to ensuring that Cigna remains firmly rooted in the values reflected in our Code.

Compliance matters to us. In every decision we make, *every single day*.



Tom O'Neil  
Global Compliance Officer, Cigna Corporation  
Thomas.O'Neil@Cigna.com



# Our Code of Ethics and Principles of Conduct

## We pledge to honor:

- › Integrity in protecting company assets, reputation and goodwill.
- › Integrity in the marketplace.
- › Integrity in the public sector.
- › Integrity as a socially responsible corporate citizen.
- › Integrity in the workplace.

## Cigna's policy of no retaliation

When you, in good faith, report Code of Ethics and Principles of Conduct or other compliance concerns, or participate in an investigation of these matters, you will not be subject to retaliation. Any Cigna employee who engages in retaliation is subject to disciplinary action up to, and including, termination of employment.



# Our Code of Ethics and Principles of Conduct

*“We are a global health service company with offices and employees around the world. In this very complex environment, we must comply with the laws in every country where we operate – and adhere to the highest ethical standards.”*

Nicole Jones, Executive Vice President, General Counsel

## **Our Code and Principles**

Cigna’s Code of Ethics and Principles of Conduct (“Code and Principles”) provide us with the guidance and principles to adhere to the highest standards of integrity, legal compliance and ethical conduct.

Our Code and Principles are adopted and approved by the Board of Directors. Cigna is developing a new Code and Principles that will be informed by the Codes that Cigna and Express Scripts have used for a number of years. The Board of Directors of the new, combined organization will review the Code in its first quarterly meeting. Once approved, the new Code and Principles will be disseminated to all employees. In the meantime, however, Cigna’s Code of Ethics and Principles of Conduct apply to ALL employees in the combined organization, regardless of role or location. In addition, Express Scripts and eviCore’s Codes of Conduct will continue to apply to their respective employees and employees of their subsidiaries and affiliates. The core values reflected in these Codes are consistent and they are the foundation for our unwavering commitment to integrity, legal compliance and ethical conduct.

No single document can anticipate and address every situation that you may face. In many cases, common sense and good judgment are the best guides. There are policies related to our Code and Principles in the following pages that also provide important information to assist you.

If you are unsure about a situation, consult with others, including your manager, human resources (HR) representative, compliance officer, or a colleague in the legal department.

In addition, you may always call the Ethics Help Line to report your concern.

## **Our commitment to integrity**

Our words and actions reflect the commitments and values of Cigna Corporation and its wholly owned or controlled subsidiaries (collectively “Cigna” or “Company”). While business practices may change over time, our commitment to our customers and the highest standards of integrity remain constant.

Conducting business ethically is critical to our success. As a leading global health service company, we must remain focused on our customers – and offer innovative products and services to help them improve their health, well-being and sense of security.

Conducting business ethically means more than just obeying laws and regulations; it means that consistent standards of integrity underlie everything we do at Cigna. Remember: When you act on Cigna’s behalf, Cigna’s long-standing and valued reputation for integrity is in your hands.

The Code and Principles apply to Cigna’s workforce members, a group which includes employees (whether full- or part-time), consultants, suppliers, volunteers and trainees. Certain Company business partners, such as agents, affiliates and consultants, are expected to adhere to the spirit of our Code and Principles, and to any contractual provisions, while working on behalf of the Company.

As a global company, we are subject to the laws of many countries and jurisdictions around the world. If a provision of our Code and Principles conflicts with applicable law, the more restrictive provision will take precedence, unless it violates the law. Consult with your compliance officer or local legal department about the laws and regulations that apply to you.



# Our Code of Ethics and Principles of Conduct

## Resolving ethical dilemmas

There will be times when our Code and Principles won't address the specifics of your situation. When this occurs, consider the following questions to help you work through the issue and decide what to do.



### *Analyze the situation*

- › What are the possible outcomes?
- › Who could be hurt and who could be helped by my decision?
- › Of the choices identified, which do the most to reduce harm; which do the most to provide help; which are most aligned with our Code and Principles?

### *Ask yourself*

- › Would my action be legal, ethical and consistent with our Code and Principles?
- › Would I be comfortable testifying about my decision in a court of law?
- › How would I feel if my decision were made public through newspapers, television or the Internet?

## What is expected: Comply with our Code and Principles, related policies and applicable laws

- › Learn our Code and Principles and complete required training timely, including ethics, privacy, information protection and compliance training.
- › Use our Code and Principles, and the related policies and procedures that apply to your work, and the law, as your guide wherever you do business.
- › Exercise good judgment and avoid even the appearance of improper behavior.
- › Seek advice when you have questions about our Code and Principles, applicable law or questionable situations.
- › Speak up about possible violations of our Code and Principles, Company policy or the law, as well as other compliance issues or concerns.

## What is expected of managers: Promote a culture of ethics and compliance

- › Be an example of appropriate conduct.
- › Ensure that the people you supervise understand their responsibilities under our Code and Principles and other Company policies.
- › Discuss our Code and Principles and reinforce the importance of ethics and compliance.
- › Create an environment where employees feel comfortable raising concerns.
- › When evaluating an employee's performance, consider their adherence to our Code and Principles.
- › Never encourage or direct employees to achieve business results at the expense of ethical conduct.
- › Act promptly to prevent violations of our Code and Principles or the law.



# Our Code of Ethics and Principles of Conduct

## **Everyone has a duty to report known or suspected violations of our Code and Principles**

If you know of, or reasonably suspect, a violation of our Code and Principles, it is your responsibility to promptly report it. By doing so, you are helping to protect the Company's business, clients, customers and partners, as well as your coworkers – and yourself. You may report known or suspected violations of our Code and Principles and other compliance issues to your manager, compliance officer, human resources representative, members of the Corporate Audit Department or the Ethics Help Line.

Managers, compliance officers, human resources representatives and members of the Corporate Audit Department, must promptly forward reports of known or suspected violations to the Ethics Help Line.

Violations of our Code and Principles, including your failure to promptly report a known violation of our Code and Principles, or making a false report of a Code violation, may result in disciplinary action up to, and including, termination of employment.

## **Confidential reporting and investigations**

When you report a possible violation of our Code and Principles, Company policy or applicable law through the Ethics Help Line, you are encouraged to identify yourself to facilitate communication. You may request to remain anonymous. Reports are treated confidentially to the extent possible, and information is shared on a need-to-know basis, consistent with conducting a thorough and fair investigation and meeting applicable legal requirements.

The General Auditor, General Counsel, and Global Compliance Officer and/or their designees investigate alleged violations of our Code and Principles. Cigna may also report violations to public officials for investigation and/or prosecution.

### **DECISION POINT** – Examples of reportable activities

- › You observe harassment.
- › Your manager directs you to make an incorrect statement in a business record.
- › You overhear coworkers discussing the private information contained in another workforce member's file.
- › Your manager fails to act when you raise a concern about suspected misconduct.
- › You obtain a report of a possible violation of our Code and Principles, other Cigna policies or the law.



# Integrity in protecting company assets, reputation and goodwill

*“Information powers our business. Our clients, customers and other stakeholders count on us and trust us to take care of their information. This is essential for protecting Cigna’s brand and reputation. Likewise, we’re all accountable for using Cigna’s assets in accordance with our policies.”*

Mark Boxer, Executive Vice President & Chief Information Officer

## Related policies and procedures

- › Business Gifts and Entertainment
- › Cigna Assets
- › Business Continuity Planning – Standards and Guidelines
- › Conflict of Interest
- › Control, Accounting and Reporting
- › Information Protection and Standards
- › Intellectual Property
- › Legal Lines
- › Privacy
- › Records Management
- › Use of Cigna names and logos

*Other local policies may also apply. To view any of the policies referenced in the Code, please visit [Cigna’s Workplace Policies](#) page.*



## Protect Cigna assets

To best represent Cigna and those we serve, we must demonstrate proper care and use of Cigna assets.

**Highly sensitive and restricted information:** Each of us must ensure that highly sensitive and restricted information regarding the Company’s business, employees, customers, clients and/or business partners is handled carefully and is disclosed only to authorized persons on a need-to-know basis.

**Cigna’s physical property:** Cigna property, including real estate, equipment and supplies, must be protected from misuse, damage, theft or other improper handling. This property belongs to Cigna and is meant for Cigna business.

**Information technology systems:** Cigna’s systems include computers, networking resources, email systems, voice systems and other computer-processed information. Each of us has a responsibility to protect these systems and the information on them from improper access, damage or theft.

Subject to local laws, Cigna may have the right to review all email and other electronic information to determine compliance with our Code and Principles and Company policy.

**Intellectual property:** Cigna intellectual property includes innovations, trademarks, copyrights and trade secrets developed on Cigna time or using Cigna resources, as well as any business ideas or information that the Company owns, such as unique products and business methodologies. Each of us must protect and keep confidential Cigna’s intellectual property. Any work product or intellectual property that you develop while employed by Cigna remains the property of Cigna. If you terminate employment with Cigna your obligation of confidentiality continues. In addition, you must respect the intellectual property of other entities. For example, you must not use the intellectual property of former employers in your role at Cigna or share this information with Cigna.

**Funds:** Cigna funds are to be used responsibly and solely for Cigna business purposes. Each of us must protect the Company’s funds from misuse or theft and ensure that Cigna receives good value when spending Cigna’s money. Reimbursement is only permitted for actual, reasonable and authorized business expenses.



# Integrity in protecting company assets, reputation and goodwill

*“A steadfast commitment to exemplary ethics is a smart business decision. Customers and clients want to do business with ethical companies. And the basis of our relationship with all of our stakeholders – whether the customers who rely on us in times of need, shareholders who invest in us, or partners who work with us – is trust. Our employees seek to maintain that trust each and every day by making the right decisions and holding themselves to the highest level of ethical standards.”*

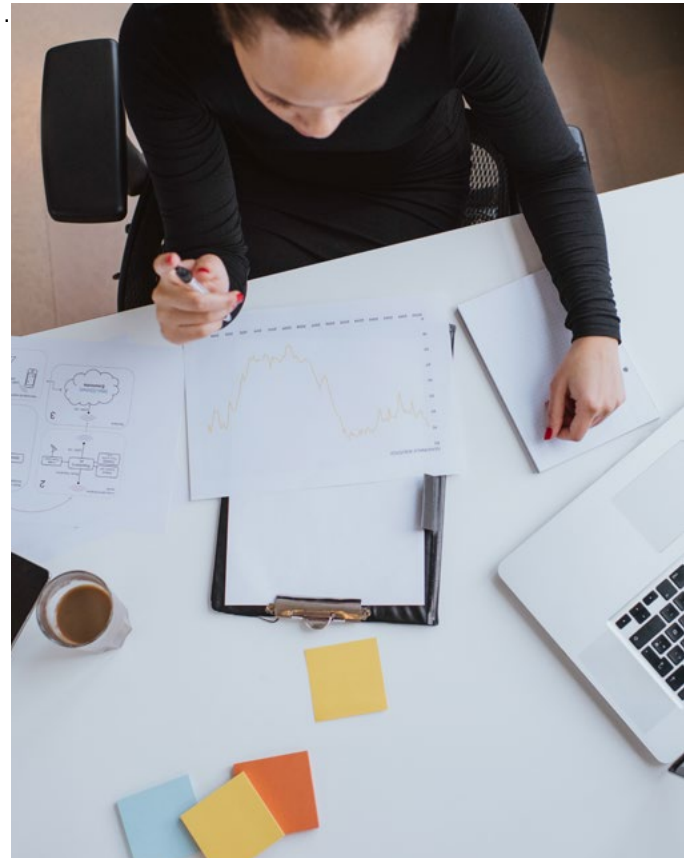
Eric Palmer, Executive Vice President & Chief Financial Officer

## Maintain accurate financial and business records

Cigna is committed to providing its investors, regulators and other stakeholders with accurate, complete and timely reports regarding Cigna’s financial condition and results of operations. The way this information is handled, maintained and reported can have a significant impact on Cigna’s reputation and management’s ability to make sound decisions. For this reason, we are committed to transactions that are recorded completely, accurately and on a timely basis. Additionally, internal and external reports and communications must be full, fair, timely, accurate and understandable.

Each of us is responsible for creating, retaining and disposing of Company records in accordance with regulatory and business requirements, and Company policies. You are required to follow the appropriate retention period for Company records, as governed by the Company’s records retention schedules, and, if applicable, any legal hold.

For further guidance, please see Cigna’s Records Management Policy.



### DECISION POINT – Maintain accurate financial and business records

- Q.** John has been working on an important transaction and the client assures him she will sign the contract soon. The quarter is closing today and John wants to include the transaction in his quarterly report. Should he?
- A. No.** Transactions must be recorded completely, accurately and on a timely basis. The deal isn’t done and cannot be included in a company report until the contract is signed.

# Integrity in protecting company assets, reputation and goodwill

*“Our continued success in the marketplace starts with conducting ourselves ethically and with integrity. This means much more than simply complying with laws and regulations. It’s about doing the right thing, every day.”*

Brian Evanko, President, Government Business Segment

## Avoid conflicts of interest

Never let your business dealings on behalf of Cigna be improperly influenced – or even appear to be improperly influenced – by your personal interests. Workforce members must always conduct themselves in ways that avoid actual or perceived conflicts of interest.

**Corporate opportunities:** You must not take or direct anyone else to a business opportunity that is discovered through the use of Cigna’s property, information or your position with the Company. In addition, you must not use Cigna’s property, information or position for any other type of purely personal gain or to compete with Cigna. If you are a director or officer of Cigna, you cannot participate in a personal transaction with Cigna or one of its subsidiaries without first notifying and obtaining the approval of the General Counsel.

## Employment and other activities outside of Cigna:

Outside employment activities can create actual or potential conflicts of interest. Conflicts of interest can arise when you, for example, work for another company; act as a partner or board member; serve as a public official or run for elected office; or present or serve on an industry panel. To avoid even the appearance of a conflict of interest, consult with your manager and the Ethics Office.

**Family relationships:** Your immediate family members, significant others and individuals in your household must never improperly influence your business decisions. These relationships require extra sensitivity to conflicts of interest and confidentiality. To the extent not prohibited by applicable law, you must report family relationships to your manager and the Ethics Office whenever that relationship creates an actual or apparent conflict of interest.



## DECISION POINT

### Avoid conflicts of interest

- › Make decisions that are in the best interests of Cigna.
- › Avoid situations that improperly influence, or appear to improperly influence, your business decisions.
- › If you are not sure, ask for help.

### Ask yourself:

- › Would my personal interests or the interests of my family compromise my ability to make objective business decisions, hinder me from effectively performing my job, or cause me to misuse Cigna assets? or
- › Could it appear that way to others?

# Integrity in protecting company assets, reputation and goodwill

## **Giving and accepting business gifts and entertainment:**

Modest gifts and reasonable business entertainment can help to strengthen business relationships. Whether provided by you or offered to you, gifts or entertainment must never improperly influence, or appear to influence, business decisions. The appropriateness of giving and receiving gifts or entertainment can often be dependent on specific circumstances.

In general, you must not offer or provide a gift to gain an unfair advantage with a business partner. In addition, you must not seek or accept a gift of greater than nominal value from anyone soliciting business from or doing business with the Company – or from any person or entity in competition with Cigna.

You may give and accept meals or other modest forms of entertainment that are reasonable and appropriate to the occasion – as long as you are accompanied by the business partner, and the entertainment is appropriate and does not improperly influence a business decision or create, or appear to create, a conflict of interest.

Always use good judgment before accepting or offering any business gift or entertainment, and consult management, compliance, or the Ethics Office with any questions.

Special care must be taken when you consider offering a gift or entertainment to officials or employees of governments or government-owned enterprises. You must consult with your compliance officer before you offer gifts or entertainment to officials or employees of governments or government-owned enterprises. Consult the Business Gifts and Entertainment policy for additional guidance on giving and accepting gifts and entertainment.



## **DECISION POINT**

### **Business entertainment**

- Q.** A business partner offers Jill tickets to a golf tournament. Should Jill accept them?
- A.** It depends. If the business partner will be attending the tournament with Jill, this may be considered business entertainment and would be acceptable if the applicable business entertainment guidelines are met. If the business partner will not be attending

with her, the tickets are a gift. She can accept them only if the applicable gift guidelines, including any limitations on cost of the tickets, are met. If Jill is unsure about what to do, she must review the Business Gifts and Entertainment policy and any business specific policy for guidance in this situation.

# Integrity in the marketplace

## Related policies and procedures

Anti-Corruption Compliance  
Antitrust and Fair Competition  
Communications and Social Media  
Economic Sanctions and Trade Restrictions  
Information Protection and Standards  
Privacy  
Securities Transactions and Insider Trading  
Supply Chain Management  
Trade Practices

To view any of the policies referenced here, please visit [Cigna's Workplace Policies](#) page.

## Respect fair business practices and competition

Cigna looks for competitive advantages through legal and ethical business practices. We must conduct business – selling and marketing products, contracting with health care providers and suppliers, paying claims and answering customer inquiries or complaints – in a fair manner. Taking advantage of anyone through, for example, manipulation or misrepresentation of information, is not acceptable or tolerated.

Cigna competes strongly, and fairly, around the world. We seek to maintain and grow our business through superior products and services – not through any improper or anticompetitive business practices. So each of us must strive to understand and comply with global competition and antitrust laws. These laws are very complex. If you are unsure of appropriate business practices, consult with your compliance officer or local legal counsel.



## DECISION POINT

### Fair business practice dos and don'ts

**Do:** Rely on public sources of information.

**Don't:** Obtain pricing information or key cost information directly from competitors.

**Do:** Consult with your local legal or compliance department before obtaining information from nonpublic sources or before engaging a consultant to obtain competitor information.

**Don't:** Seek confidential information about competitors from prospective employees during interviews.

**Do:** Document sources for all information obtained about competitors.

**Don't:** Use the intellectual property of another company.

# Integrity in the marketplace

## **Engage in open, fair and accurate business communications**

Cigna's relationships with customers and business partners depend on the exchange of accurate information – through appropriate channels. We encourage various methods of communication to promote our business and manage relationships, including social media (blogs, chat rooms and wiki sites).

We cannot misstate facts about our business, or conceal information necessary to fairly operate our business. You may only speak on behalf of Cigna if you have prior authorization and approval from Corporate or International Communications, and you must adhere to approved scripting. You must direct all media inquiries to Corporate Communications. In addition, you must never give the impression that you are speaking on behalf of Cigna in any personal communications.

## **Protect customer, employee and client privacy and confidentiality**

Our customers, employees and clients expect us to protect their personal and business information. You must never compromise their trust by collecting, using or disclosing private or sensitive information other than as communicated in Cigna's privacy notices and in compliance with Cigna's privacy and information protection policies.

Many employees routinely come into contact with patients' personal information and/or that of company employees. Federal regulations, known collectively as HIPAA, are designed to protect the privacy of "protected health information" (PHI). Personal information may be considered PHI if it relates to a patient's physical or mental condition, or the provision of or payment for health care.

It's important for employees to be thoroughly familiar with HIPAA regulations and our company's related privacy policies and procedures. If you have access to PHI, you're responsible for protecting that information

from improper use and disclosure. You must not access, use or disclose any PHI unless you have a legitimate business or patient-care purpose, as defined by HIPAA and company policy, and you may not use PHI for your personal benefit. State law also plays an important role in protecting patient information. In addition to HIPAA, state laws provide extra protection to especially sensitive information, and many states have their own requirements regarding notice to individuals if there is a breach of their personal information and/or PHI. Federal and state laws in this area are complex and always changing; that's why training on these topics is especially important. Various federal and state laws and regulations protect personally identifiable information (PII) even if it's not related to health care. PII includes any name or number that may be used to identify a person; examples include an individual's name, Social Security number, date of birth and driver's license number. We're all responsible for protecting PII from identity theft.

You're encouraged to contact your supervisor or our Privacy Officer if you have any HIPAA or privacy-related issues.

Outside of the United States, many countries maintain and enforce their own privacy laws. In many cases, international privacy laws are more onerous or have a broader application than those found in the United States. For questions involving laws outside of the United States, including, but not limited to, the General Data Protection Regulation (GDPR) in effect in the European Union, please contact the International Privacy Officer.

Classifications of personal information or business data might differ by country, state or municipality. You are responsible for knowing and complying with all information protection and privacy laws that apply to your role at Cigna.





# Integrity in the marketplace



## DECISION POINT

### Social media

**Q.** What must I keep in mind if I'm on a social media site?

**A.** You must not disclose confidential information or sensitive information. Harassing, discriminatory or profane language must not be used. Think carefully about how you or your friends or family would feel if your comments were publicized on the front page of your local newspaper. Please consult the Communications and Social Media policy for additional guidance.

### Information protection dos and don'ts

**Do:** Understand the different categories of information – highly sensitive, restricted, proprietary and public – and the safeguards needed to protect them.

**Don't:** Install or use any non-Cigna approved hardware or software.

**Do:** Retrieve confidential documents at the printer or fax immediately.

**Don't:** Email Cigna information to your personal email account (e.g., gmail) or save Cigna information to non-Cigna equipment, such as a home PC, tablet or smartphone.

### Report disclosures of personally identifiable information (PII)

**Q.** Who do I report the inappropriate disclosure of personally identifiable information to?

**A.** Report, without delay, the inappropriate disclosure of an individual's PII to the Enterprise Privacy Office. Report any international privacy issues to your local legal department or compliance officer.

### Report disclosures of highly sensitive and restricted information

**Q.** Who do I report the inappropriate disclosure of highly sensitive and restricted information to?

**A.** Report all inappropriate disclosures of highly sensitive or restricted information to Cigna Legal.



# Integrity in the marketplace

## **Trade securities legally**

There are strict laws and regulations that prohibit insider trading. Insider trading refers to the illegal practice of trading securities while you are aware of material nonpublic information (also known as “inside information”) about a company. You must not buy, sell or trade Cigna securities – or the securities of other companies – until that information becomes public. Information is considered public when it has been publicly released by a company (for example, by means of a press release) and enough time has elapsed to permit the investment market to absorb and evaluate the information.

Inside information can take many forms, but generally means information that there is a likelihood a reasonable investor would consider important in making an investment decision to buy, sell or hold a company’s securities. It may involve information affecting a company other than Cigna that you learn about as a Cigna employee. Common examples are financial information, new contracts, products or business growth plans and major organizational changes.

Handle inside information just like you would handle other Cigna confidential information: Don’t discuss it with family, friends or anyone else; don’t talk about it in public places; don’t fax it to unattended machines; don’t email it to general information email addresses; and don’t tell others at Cigna unless they must know for business reasons to perform their responsibilities.

# Integrity in the marketplace

*“As a leading global health service company, we must continue to respond to the ever-changing dynamics of markets and regulatory jurisdictions around the world. It’s essential that we maintain an awareness of the variety and complexity of laws that affect how we conduct our businesses. Each of the countries and jurisdictions where we do business has their own laws and regulatory frameworks, and we must continue to actively work to ensure we comply with all local legal requirements.”*

Jason Sadler, President, International Markets

## Honor economic sanctions and trade restrictions

In order to comply with the United States and other applicable sanctions programs, we cannot do business in certain countries or with certain governments, individuals and entities – such as suspected terrorists or terrorist governments, or suspected narcotics traffickers. If you have questions or concerns about whether a government, individual or entity is subject to these restrictions, consult with your compliance officer.

We are also prohibited from participating in any boycott of a particular country unless sanctioned by the United States Government. If you are asked to participate in, or provide information about support of, a boycott, report this to your compliance officer before taking any action.

We work for a global company. This means countries’ laws and regulations may differ or even conflict with these restrictions. As such, it is important that you consult with your compliance officer if you have any questions.

## Manage suppliers and contractors diligently

We expect that our suppliers and contractors will conduct their activities on behalf of the Company consistent with our Code and Principles and in accordance with their contracts with Cigna. We must

be diligent in assuring that these parties live up to their obligations. Business partners may not create incentives for anyone at Cigna to violate our Code and Principles, Company policies or the law.

## Take a stand against bribery and corruption

We must never use improper means to influence another party’s business judgment. This means that no Cigna workforce member may offer or provide bribes or other improper benefits to someone in order to obtain or retain business or an unfair business advantage that involves Cigna, our customers or employees.

It is especially important that we never make payments or promises or offer something of value to a government official or employee to obtain or retain business or secure an unfair business advantage. Something of value is not limited to cash payments to the government official, for example agreeing to make a payment to a charity at the request of a government official would constitute something of value.

In order to comply with various anti-corruption laws and regulations around the world, Cigna maintains robust controls over Company assets and accounting practices to assure that books and records are honest and accurate. If you know of or suspect a violation of any of these laws, you must report it promptly to your compliance officer.

## DECISION POINT

### Who is a government official?

The definition of government official is broad and may include officers or employees of any wholly or partially government-owned or -controlled entity such as a state or federal health plan or prescription drug plan client, public hospital, candidates for political office, or officers or employees of international government organizations.



# Integrity in the public sector

## Related policies and procedures

Anti-Corruption Compliance

False Claims

Government Contracts/Anti-Kickbacks

Political Contributions/Government Contacts

To view any of the policies referenced here, please visit [Cigna's Workplace Policies](#) page.

## Submit true and correct claims to the government

If we participate in submitting claims to a government or governmental agency for payment, such as Medicare or Medicaid in the United States, we must make sure that they are true and accurate; if not, both Cigna and individual employees can be held liable. You must promptly report any violations of this type if you know or suspect that fraud or abuse has been committed.

## Contact government officials responsibly

Communications with government officials or employees must always contain complete, factual and accurate information. We are permitted to have contact with government officials or employees (such as regulators) in order to conduct Cigna's routine business, if it is part of our job responsibility. All other contacts with government officials or employees (such as seeking new business from a

government agency or seeking to influence the development of laws, regulations or policy) must be initiated through:

- › Cigna's Public Policy and Government Affairs Department for contact with United States Congress or federal agencies
- › The Regulatory and State Government Affairs Department for contact with states or state agencies
- › Your local legal department for contact with governments or agencies outside the United States

## Abide by government contracting rules

When Cigna's products or services are paid for (even partially) by a government program, we may be subject to additional legal requirements that pertain to government contracting. If we work in a business that operates under government contract, we are expected to comply with all applicable rules and regulations. That includes, for example, specific rules that prohibit intentionally requesting or receiving any compensation (including free or below-cost services) in return for recommending or arranging for the purchase of goods, items or services reimbursable by the government.

## DECISION POINT

### Contacting government officials responsibly – dos and don'ts

**Do:** Contact the Public Policy and Government Affairs Department or your local legal department if a government official or employee requests information and you are not authorized to respond to such requests.

**Don't:** Contact a government official or employee to seek new business before you contact the Public Policy and Government Affairs Department or your local legal department, as appropriate.

**Do:** Provide complete and accurate responses, if you are authorized to respond to government inquiries.

**Don't:** Conceal records or documents from government officials or employees.



# Integrity as a socially responsible corporate citizen

## Related policies and procedures

Charitable Contributions

Political Contributions/Government Contacts

To view any of the policies referenced here, please visit [Cigna's Workplace Policies](#) page.

## Participate in the political process with care

Cigna encourages its employees, officers and directors to participate in the political process as private citizens. However, when you make political contributions or engage in political activities on a personal basis, care must be taken to clearly distinguish personal political views from those of the Company. Any use of Cigna equipment, supplies, time, facilities, phones or administrative support in connection with any sort of political activity would be a misuse of company assets, but could also be considered a “political contribution” in violation of laws and Cigna’s policies that apply to corporate contributions. In some cases, even personal giving may be prohibited. In certain cases, employees or even spouses may be prohibited from giving.

## Make donations consistent with company giving

Cigna provides charitable donations, sponsorships and contributions to nonprofit organizations whose work supports the health, well-being and sense of security of individuals and communities around the globe. We are proud of our history of giving back to the communities we serve and of being a socially responsible corporation. Nonetheless, all charitable contributions must be transparent and paid to nonprofit organizations whose charitable goals are compatible with Cigna’s policies.

Before you use Cigna funds to make a monetary or in-kind charitable contribution; provide sponsorship support to benefit a charitable organization; or otherwise donate or allow the use of Cigna assets by or for such an organization from any business line budget, you must obtain written approval from the Director of Civic Affairs or his or her designee. To receive written approval from the Director of Civic Affairs, you must submit the request via the locally approved Charitable Contributions Request Form. The Cigna Foundation is a separate entity, making charitable grants primarily to health-related nonprofit projects. Requests for funding of any kind from the Cigna Foundation process must be submitted through the Foundation’s application and be approved by the Foundation’s Executive Director.

## DECISION POINT

### Company giving

- Q.** I have my manager’s support for Cigna to participate in a small local charity event. Why do I also need approval from Cigna Civic Affairs?
- A.** Every contribution of Cigna funds and assets support Cigna’s reputation as a good corporate citizen. Every contribution has legal significance, as well. The Civic Affairs Department has the responsibility of making sure that our corporate charitable contributions comply with all applicable laws and New York Stock Exchange listing standards. Civic Affairs also tracks contribution information for use in Cigna’s corporate Annual Report and yearly Contributions Report, and for communications and information requests from governmental entities, nonprofit organizations and potential customers.



# Integrity in the workplace

*“We have long had a passionate commitment to diversity and equal opportunity at Cigna. We’re committed to treating all employees fairly, and our workplace policies expressly prohibit discrimination or harassment in any form. More importantly, we expect all employees to uphold Cigna’s values every day, in every interaction, with everyone.”*

John Murabito, Executive Vice President & Chief Human Resources Officer

## Related policies and procedures

Communications and Social Media  
Equal Employment Opportunity  
Harassment Avoidance

To view any of the policies referenced here, please visit [Cigna’s Workplace Policies](#) page.

Cigna believes that fair, equitable treatment of employees, patients and all persons is critical to fulfilling our mission.

## Nondiscrimination with respect to customers and patients

It is Cigna’s policy to enroll and serve clients, members, patients and customers without regard to race, color, religion, sex, ethnic origin, age, disability, status with regard to public assistance, genetic information or any classification protected under applicable law.

## Promote equal employment opportunity

Cigna promotes diversity and equal opportunity in employment. Each of us is responsible for maintaining a positive work environment and ensuring that all individuals are treated with respect and dignity. Our employment-related decisions must be based upon an individual’s skills, qualifications and job performance. We do not allow decisions to be based on any factors that are discriminatory and prohibited by law – including, in the United States for example, race, color, sex (including pregnancy), age, disability, veteran status, religion, national origin, ancestry, sexual orientation, gender identity, marital status, domestic partner status, genetic information or citizenship status.

## Prevent harassment

Cigna does not tolerate any form of harassment, which includes any type of verbal or physical behavior that is intimidating, threatening or demeaning (examples include racist, sexist or ethnic comments or jokes). Harassment is not only unacceptable in Cigna’s offices, but also in any other Cigna work setting, at any Cigna-sponsored event or when using Cigna’s electronic assets (e.g., email, voicemail and Internet access). Each of us must avoid engaging in any of this conduct and, if we observe it, report it to management or human resources.



## Communicate openly, respectfully and honestly

Open communication means we give one another accurate and timely information about business issues. Differing opinions and expressions of concern are welcome; while we may disagree with one another, healthy debate is important. Our communication with each other is always professional and courteous. Being rude or abusive is never acceptable. Open communication is an expression of respect for each other.

## DECISION POINT

### No retaliation

- Q.** Jessica recently witnessed several employees referring to one of her colleagues in a derogatory, racist manner. What should she do?
- A.** Jessica should promptly report her concern to her manager or human resources. If she is not comfortable talking to her manager, she should contact her employee relations representative, compliance officer or the Ethics Help Line.

# Key contacts

**Cigna has many options to help you with questions, and to report concerns.**

## Your Manager

**Purpose:** Your best contact for workplace issues

## Human Resources Generalist

Your Cigna Life Service Center:

**Call toll-free:** +1.800.551.3539\*

Your local Employee Relations Representative:  
+1.215.761.1900 (international/domestic)

**Purpose:** Employment concerns

## Cigna Information Protection

**Email:** [CignaInformationProtection@Cigna.com](mailto:CignaInformationProtection@Cigna.com)

**Purpose:** Help with information protection issues

## Global Security and Aviation

24-hour emergency numbers

**Call toll-free:** +1.800.222.0852\* or

+1.215.761.6279 (international/domestic)

**Purpose:** Report thefts of Cigna physical property

## Enterprise Compliance

For Workforce Members: On *Iris*, under Enterprise > Our Business Units > Cigna Legal > Ethics and Compliance

**Purpose:** Advice and interpretation of our Code and Principles and supporting policies

## Enterprise Privacy Office

**Email:** [PrivacyOffice@Cigna.com](mailto:PrivacyOffice@Cigna.com) or [CignaHealthCarePrivacyOffice@Cigna.com](mailto:CignaHealthCarePrivacyOffice@Cigna.com)

**Purpose:** Advice and policy interpretation on domestic privacy issues or incidents

## Ethics Help Line\*\*

**Call toll-free:** +1.800.472.8348\*

Toll-free calls, from outside the United States, can be made using the [Access Codes](#)

**Email:** [Ethics@Cigna.com](mailto:Ethics@Cigna.com)

## Websites:

For U.S. and Non-European workforce members and individuals:

[CignaEthicsHelpline.Alertline.com](http://CignaEthicsHelpline.Alertline.com)

European workforce members:

[CignaEUethicsHelpline.Alertline.com](http://CignaEUethicsHelpline.Alertline.com)

**Purpose:** Advice and interpretation of our Code and Principles, and to report concerns

## Legal Department

For workforce members: On *Iris*, under Enterprise > Our Business Units > Cigna Legal

**Purpose:** Advice and interpretation of laws and regulations

## Corporate Audit Department

**Email:** [GeneralAuditor@Cigna.com](mailto:GeneralAuditor@Cigna.com)

**Purpose:** Report known or suspected violations of our Code

## International Privacy Office

**Email:** [InternationalPrivacyMailbox@Cigna.com](mailto:InternationalPrivacyMailbox@Cigna.com)

**Purpose:** Advice and policy interpretation on international privacy issues

# Cigna's policy of no retaliation

When you, in good faith, report Code and Principles or other compliance concerns, or participate in an investigation of these matters, you will not be subject to retaliation. Any Cigna employee who engages in retaliation is subject to disciplinary action up to, and including, termination of employment.

Under limited circumstances, a waiver to a portion of our Code and Principles may be granted by the Chief Compliance Officer or their designee. Any requests for a waiver to any provision included in this Code and Principles must be in writing. Cigna's Board of Directors must authorize any waivers for executive officers and directors. Waivers will be promptly disclosed when required by applicable law.

Cigna may update our Code and Principles from time to time, and Enterprise Compliance will communicate any significant changes.

Cigna's Code and Principles is not a contract of employment and does not create any contractual rights between Cigna and those people covered by our Code and Principles.

\* Note: If you are calling from outside of the United States, and you would like the call to be free, dial: Access Code + 800.472.8348. If you are not aware of the access code, it can be located by [clicking here](#).

\*\* The Ethics Help Line is managed by the Compliance Department, an independent function reporting to Cigna's Board of Directors. The +1.800 number is staffed 24 hours a day/seven days a week, and calls can be handled in multiple languages.

This Code is intended to comply with all applicable laws and regulations. Nothing in this Code is intended to restrict or otherwise discourage employees from engaging in protected concerted activity for mutual aid or protection as described in Section 7 of the National Labor Relations Act.

All Cigna products and services are provided exclusively by or through operating subsidiaries of Cigna Corporation, including Cigna Health and Life Insurance Company, Connecticut General Life Insurance Company, Cigna Behavioral Health, Inc., and HMO or service company subsidiaries of Cigna Health Corporation. The Cigna name, logo, and other Cigna marks are owned by Cigna Intellectual Property, Inc. All pictures are used for illustrative purposes only.

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