



CIGNA Corporate Policy for Employees on Political Contributions/Government Contacts

Purpose and Scope

To comply with all U.S. and foreign laws and regulations surrounding **political contributions**, **government contacts** and **lobbying**, and to maximize the effectiveness of CIGNA's grassroots and employee advocacy efforts. This policy applies to all employees of CIGNA Corporation and its subsidiaries.

Policy

General - It is CIGNA's policy to obey all laws in promoting its positions to government authorities and making **political contributions**. CIGNA encourages employees to participate in the political process as private citizens by registering to vote and staying abreast of the issues.

Political Contributions - CIGNA's political action committee, CIGNA PAC, makes US political contributions on behalf of CIGNA's business interests. In rare circumstances, political contributions are made by CIGNA Corporation and/or its subsidiaries - exclusive of CIGNA PAC - with the prior approval of the General Counsel and the Chief Executive Officer. CIGNA PAC is funded by the voluntary contributions of eligible employees. Consistent with federal regulation, only eligible employees are asked to consider supporting CIGNA PAC.

Legislators or candidates for elective office may be invited to visit corporate facilities to meet employees only after the General Counsel or the General Counsel's designee has determined in advance that the visit complies with applicable law and CIGNA's policies and strategy.

Government Contacts and Lobbying - CIGNA Government Relations, which includes the Federal Affairs and State Government Affairs departments, in cooperation with CIGNA's Legal Department, is responsible for all **government contacts** on behalf of CIGNA. Such contacts include spoken and written comments presented on behalf of CIGNA, including personal conversation, letters, post cards, telephone calls and/or e-mails to any foreign or domestic government officials. This also specifically refers to the presentation of testimony and information, handling requests for assistance by government officials, and any form of advocacy or **lobbying** on industry or public issues of interest to CIGNA. Lobbying activities must comply with all federal and state laws and regulations. All government contacts must be reviewed in advance by CIGNA Government Relations.

Grassroots and Political Advocacy - CIGNA Government Relations may ask employees, customers and others to contact state or federal legislators regarding issues important to CIGNA. Such requests generally will include background information about the issue, its importance to the business and a suggested message to legislators, but any contacts are strictly voluntary.

Service as an Elected or Appointed Government Official - CIGNA will not ask an employee to seek or serve in an elected or appointed government position. However, an employee may serve in such a post where such service is permitted under the CIGNA's Conflicts of Interest policy.

Requirements

As an employee of a CIGNA Company you must be aware of the specific guidelines for interaction with government entities:

Political Contributions

- The term "**political contribution**" covers more than cash donations to candidates, political parties, and political action committees or funding related to a particular referendum or ballot initiative. The use of CIGNA equipment, supplies, time, facilities or other property in support of a candidate, political party or ballot issue, and participation in political events that normally require a contribution may be considered a political contribution.
- You should be aware that the assistance of CIGNA administrative or support personnel or the use of corporate facilities and telephones by candidates, political parties or political action committees (except CIGNA PAC), or in connection with a referendum or other ballot initiative is considered a political contribution, and is prohibited unless approved in advance by the General Counsel or the General Counsel's designee.
- You may not request or authorize a corporate check for any political contributions or authorize employee reimbursement for any expenses incurred in attending political events or for any political contributions.

- You may not provide gifts or entertainment to any government official or government employee without the approval of your Business/Function's Chief Counsel. See CIGNA's Gifts and Entertainment policy.
- You are permitted to suggest candidates as potential recipients of political contributions from CIGNA PAC. CIGNA PAC will make the determination based on its contribution criteria.

Government Contacts and Lobbying

- You should consult a Federal Affairs officer and/or your State Government Affairs officer before:
 - contacting any federal, state or local legislative or judicial official or staff member, or member of a foreign government, on behalf of CIGNA. This applies to contacts made in conjunction with, or at the request of, the state and federal trade associations and professional organizations to which CIGNA or any of its subsidiaries belong.
 - contacting federal or state regulatory officials, except for routine compliance contacts undertaken in the normal course of business.
 - responding to a legislative inquiry regarding a CIGNA customer or member claim, or any other matter.
- If you are authorized by Government Relations to engage in **political activity** on CIGNA's behalf, you must comply fully with all applicable federal, state or local laws, or laws of a foreign country in which CIGNA operates. Such laws may require you to register as a lobbyist and/or report **lobbying** activity. If you have questions, contact a Federal Affairs officer or your State Government Affairs officer.
- Before commenting publicly on any issue in circumstances in which your comments could be associated with CIGNA, you must first secure authorization by the appropriate Communications/PR representative. See CIGNA's policy on External Communications.
- You should not register as a state or federal lobbyist, or engage in state or federal **lobbying** activities on CIGNA's behalf, without the prior approval of the General Counsel or designee. You may not engage in lobbying without being registered to do so, if state or federal law requires registration. If you are unsure whether any of your planned activities constitute "lobbying" with respect to which registration is required, you should consult a Federal Affairs officer or your State Government Affairs officer.
- If your job responsibilities include **lobbying**, you must submit copies of compliance documents to a Federal Affairs Officer or your state Government Affairs Officer.
- You should consult a Federal Affairs officer or your State Government Affairs officer before engaging in any **lobbying** activities for CIGNA's state and federal trade associations and professional organizations. You should also consult the appropriate Government Affairs officer if you are not sure whether any of your planned activities constitute lobbying.
- You should not retain an **outside lobbyist** or law firm for the purpose of lobbying. The General Counsel has sole responsibility for retaining outside lobbyists and/or law firms for the lobbying purpose.

Grassroots & Employee Advocacy

- CIGNA may ask you to contact state or federal legislators as a constituent regarding important issues to the company. Your participation in the advocacy process is encouraged, but not required.
- You may use the CIGNA intranet site to contact legislators regarding CIGNA business issues only.
- You should feel free to participate in political activity as a private citizen, if the involvement does not interfere with satisfactory work performance or create the impression that you are speaking or acting on CIGNA's behalf. See CIGNA's policy on External Communications.

Responsibilities

All CIGNA employees are responsible for complying with this policy.

The Vice President of Federal Affairs and the Vice President of State Government Affairs are responsible for government contacts, testimony and advocacy at the federal and state levels, and all Federal Elections Commission compliance requirements, requests and/or procedures.

The General Counsel is ultimately responsible for the development, interpretation and enforcement of this policy.

Reporting Policy Violations

Ethics Help Line 1-800-472-8348

Definitions

Government contacts - Refers to all oral and written remarks, including personal contact, letters, post cards, telephone calls and e-mails to any federal, state or local legislative or judicial official, or member of a foreign government, made on behalf of CIGNA. This also specifically includes the presentation of testimony and information, handling of assistance requests and any form of advocacy or lobbying on industry or public issues of interest to CIGNA. "Government contacts" does not include routine compliance contact with regulatory officials in the normal course of business.

Lobbying - As defined by law of the relevant jurisdiction, generally involves multiple contacts with members of state and/or federal legislatures, legislative staff, or executive branch officials or staff members. Each state and the federal government has its own lobby laws which impose lobby registration and reporting requirements on persons who contact certain public officials for the purpose of influencing certain governmental decisions or actions.

Outside lobbyists - Refers to persons, law firms, companies and other organizations which contact foreign, federal, state or local executive or legislative bodies on behalf of CIGNA with the intent to influence the decisions of those agencies. "Outside lobbyists" include trade association lobbyists when lobbying on behalf of CIGNA. "Outside lobbyists" do not include trade association lobbyists when lobbying on behalf of the trade association. Law firms representing CIGNA before federal agencies such as the Internal Revenue Service, Department of Labor, or the Securities and Exchange Commission on CIGNA business are not considered outside lobbyists. Consult with Federal or State Government Affairs for guidance on whether a firm is engaged in lobbying.

Political contributions - Include, but are not limited to, the following in connection with any candidate for office, political party or political action committee: (i) cash or other donations, such as use of CIGNA equipment, supplies, time, or other property, (ii) participation in political events at the federal, state or local level, at which attendance is often predicated upon a political contribution, (iii) contributions to support or oppose ballot initiatives, and (iv) the use of corporate facilities and/or telephones in support of a candidate or issue.

Political activity - Includes, but is not limited to volunteering or staffing a political campaign; attending fundraisers or other political events or rallies.