



CIGNA

CODE OF ETHICS AND PRINCIPLES OF CONDUCT



Ethics and Compliance at CIGNA: Every Employee, Every Decision, Every Day

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Under limited circumstances, a waiver to a portion of our Code and Principles may be granted by the Global Chief Compliance and Ethics Officer. Any requests for a waiver to any provision included in this Code of Ethics and Principles of Conduct 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 of Ethics and Principles of Conduct from time to time, and Enterprise Compliance will communicate any significant changes.





Our Commitment to Integrity: CIGNA's Code of Ethics and Principles of Conduct

Every day, the CIGNA team changes our customers' lives for the better. This is a powerful statement, reflective of our work together to improve the health, well-being and sense of security of the people we serve around the world.

Delivering the highest-quality customer service on a global scale is no small task. Our customers expect this of us. The world is changing – customer needs are changing – and our industry is more competitive than ever. But CIGNA is up to the challenge. We have the capabilities, skills and passion – and, most importantly, the people – to fulfill our mission and help our customers live better lives.

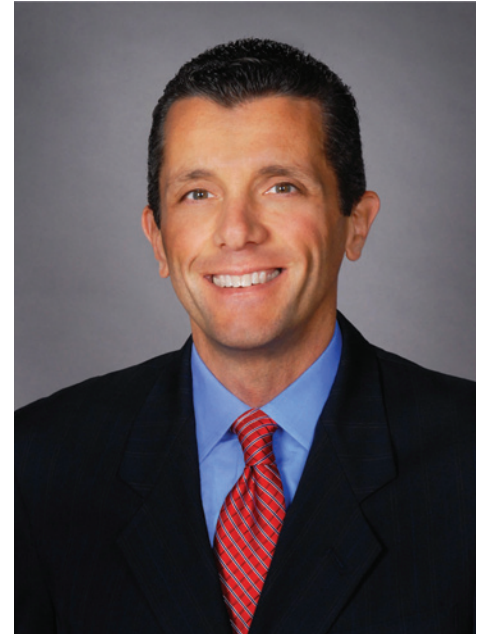
CIGNA's Code of Ethics and Principles of Conduct are the foundation for our unwavering commitment to integrity, legal compliance and ethical conduct. They are a "real-world guide" to the behaviors and principles of conduct we embody as a team committed to making life better for millions of people in all corners of the world. And, they apply to you – as a member of the CIGNA team – regardless of your role or location.

Ultimately, it's about serving our customers, stakeholders, communities and each other honestly, fairly and with absolute transparency. I am proud to work beside dedicated, conscientious professionals who value conducting business ethically and are passionate about serving above all else. That's the high standard we set for ourselves.

I encourage you to take a few moments to read the following pages, and become familiar with our Code of Ethics and Principles of Conduct. And, continue to act with integrity in all of your interactions – everyday. 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 around the globe.

David M. Cordani
President and CEO,
CIGNA Corporation

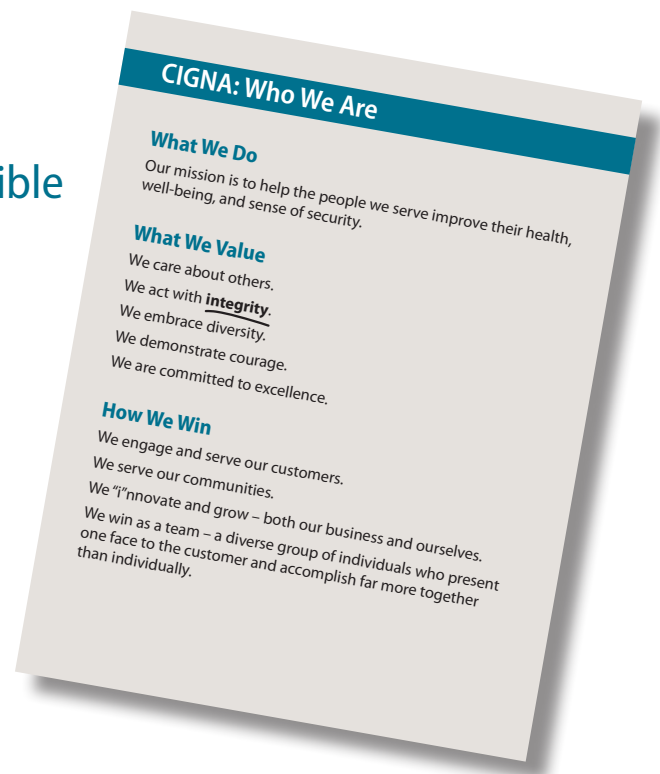


Our Code of Ethics



We Pledge to Honor:

- ✓ Integrity in the Workplace
- ✓ Integrity in Protecting Company Reputation and Goodwill
- ✓ Integrity in the Marketplace
- ✓ Integrity in the Public Sector
- ✓ Integrity as a Socially Responsible Corporate Citizen



Our Principles of Conduct

“We are a global health services 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

This Code of Ethics and Principles of Conduct (“Code and Principles”) outline important principles and guidance for adhering to the highest standards of integrity, legal compliance and ethical conduct at CIGNA.

Of course, no single document can anticipate and address every situation that you may face. In many cases, common sense and good judgment may be the best guide. In addition, there are policies related to our Code and Principles mentioned in the following pages that also provide important information to help you.

In some cases, you may want to consult with others – including, for example, your manager, Human Resources (“HR”) representative, compliance officer, a member of Enterprise Compliance or the Ethics Help Line.

Our Commitment to Integrity

Our words and actions reflect not only ourselves, but 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. This is a crucial time for CIGNA. 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. As such, conducting business ethically is critical to our success. It means more than just obeying laws and regulations; it means that consistent standards of integrity underlie everything we do at CIGNA. Whatever you do, remember: When you act on CIGNA’s behalf, CIGNA’s long-standing and valued reputation for integrity is in your hands.

Our Code and Principles apply to employees, officers and directors of the Company. 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 conflict with applicable law, the more restrictive provision will take precedence, unless it violates the law. You should consult with your compliance officer or local legal department about the laws that apply to you.

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?

Get Answers from Key Contacts

If you have any questions or concerns about the right decision or action to take, or if you observe or hear about questionable decisions or actions by others, you should seek assistance from a number of [Key Contacts](#). (See page 16)

Our Principles of Conduct

What Is Expected of All of Us: Comply with our Code and Principles, Related Policies and Applicable Law

- Learn our Code and Principles and participate in ethics and compliance training.
- Use our Code and Principles, the 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 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.
- Take opportunities to discuss our Code and Principles and reinforce the importance of ethics and compliance.
- Create an environment where employees feel comfortable raising concerns.
- Consider conduct in relation to our Code and Principles and other Company policies when evaluating employees' performance.
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with our Code and Principles or the law.
- Always act promptly to stop violations of our Code and Principles or the law.

Everyone's 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 the Code and Principles and other compliance issues to your manager, your compliance officer, a member of Enterprise Compliance or the Ethics Help Line.

Managers, compliance officers and members of the legal department must forward reports of possible 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, may result in disciplinary action up to, and including, termination.



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 private information contained in another coworker's employment file.
- Your manager fails to act when you raise a concern about suspected misconduct.
- As a manager, compliance officer or member of the legal department, you obtain a report of a possible violation of the Code and Principles, other CIGNA policies or the law.

Our Principles of Conduct

Confidentiality and Investigations of Reports

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 applicable legal requirements.

The General Auditor, General Counsel, and Global Chief Compliance and Ethics Officer and/or their designee investigate alleged violations of our Code of Ethics and Principles of Conduct. Violations may also be reported to public officials for investigation and/or prosecution.



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.



Our Pledge to Each Other: 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 every one."

John Murabito, Executive Vice President, Human Resources & Services

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.



Decision Point

No Retaliation

Q. Jessica, who had previously complained of discrimination on the basis of race, is now concerned that her manager is not giving her the same type of work that she had previously received. What should she do?

A. Jessica should promptly report her concern. If she is not comfortable talking to her manager, she should contact her compliance officer or the Ethics Help Line.

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.

Integrity in the Workplace

Policies* and Procedures

Equal Employment Opportunity
Communications and Fair Disclosure
Harassment Avoidance

*Other local policies may also apply.

[Key Contacts](#) (See page 16)

[FAQs](#)



Our Pledge to CIGNA: Integrity in Protecting Company Assets, Reputation and Goodwill

"We're committed to providing our investors and other stakeholders with accurate, timely information. This information can have a significant impact on our business results and reputation. That's why it's so important for every employee on the global CIGNA team to handle, maintain, and report on this information in compliance with all laws and regulations. The public expects this of us – plus, it's the right thing to do."

Ralph J. Nicoletti, Executive Vice President & Chief Financial Officer

Maintain Accurate Financial and Business Records

CIGNA is committed to providing its investors 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 ensuring that transactions 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 all legal, regulatory and business requirements,

and Company policy. You are required to follow the appropriate retention period for Company records, as governed by the Company's records retention schedules.

Avoid Conflicts of Interest

CIGNA's expectation of each of us regarding conflicts of interest is straightforward: never let your business dealings on behalf of CIGNA be improperly influenced – or even appear to be improperly influenced – by your personal interests. We must always conduct ourselves in ways that avoid actual or apparent conflicts of interest.

You should report potential conflicts of interest to your manager, who will work with your compliance officer, your HR representative, a member of Enterprise Compliance and/or the Ethics Help Line to best handle the situation.



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

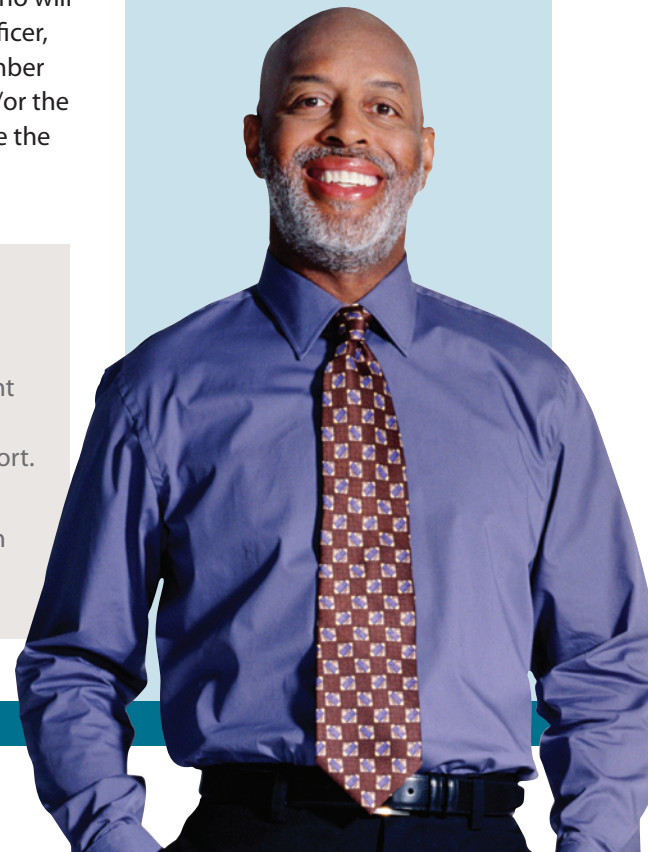
Policies* and Procedures

- CIGNA Assets
- CIGNA Brand Management
- CIGNA's Business Continuity Planning Standards and Guidelines
- Conflicts of Interest
- Control, Accounting and Reporting
- Enterprise Privacy Policies
- Information Protection
- Information Protection Standards
- Intellectual Property
- Legal Line Guidelines
- Records Management Policy
- Use of CIGNA Names and Logos

*Other local policies may also apply.

Key Contacts (See page 16)

FAQs



Our Pledge to CIGNA: Integrity in Protecting Company Assets, Reputation and Goodwill

“Relationships are critical to the way we conduct business – whether it’s building new relationships or sustaining relationships with our customers, clients and health care professionals around the globe. Regardless of whether they’re personal or professional, we must hold ourselves to the highest standard of compliance with all of our relationships.”

Matt Manders, President, U.S. Service, Clinical & Specialty



DECISION POINT

Avoid Conflicts of Interest

- Make decisions 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?

Corporate Opportunities : You must not take or direct someone 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 a potential conflict of interest. Conflicts of interest can arise when you, for example, work for another company; act as a partner or board member; contribute to a foundation, charity or non-profit organization; serve as a public official or run for elected office; or present or serve on a panel that includes being paid a fee for this service. To avoid even the appearance of any conflict with CIGNA's best interests, consult with your manager.

Giving and Accepting Gifts: Modest gifts can help you strengthen business relationships, but should be viewed as courtesies. Whether accepted or offered to you, a gift must never improperly influence, or appear to influence, business decisions.

The appropriateness of gift giving and receiving can often be dependent on specific circumstances. In general, you should 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. In addition, you must not offer or provide a gift to gain an unfair advantage with a business partner. You should always use good judgment before accepting or offering any business gift, and consult management with any questions.

Special care must be taken when you offer or receive gifts or entertainment to or from officials or employees of governments. You must consult your compliance officer before you offer gifts or entertainment to officials or employees of governments, or

anytime you have questions about our policies that govern gifts and entertainment.

Consult the Conflicts of Interest policy for additional guidance on giving and accepting gifts.

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

Business Entertainment: Entertainment can help to build and maintain business relationships. 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 does not improperly influence a business decision or create or appear to create a conflict of interest.

Our Pledge to CIGNA: 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



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 under the Conflicts of Interest

policy 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. Jill should consult the Conflicts of Interest policy for guidance in this situation.

Protect CIGNA Assets

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

Sensitive Information: Each of us must ensure that sensitive information regarding the Company's business, employees, customers, clients and/or business partners is handled carefully and is only disclosed 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. In general, this property is meant for CIGNA business.

CIGNA's Information Technology (IT)

Systems: CIGNA's IT 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.

CIGNA Intellectual Property:

CIGNA intellectual property consists of any business ideas or information that the Company owns, such as unique products and business methodologies. Each of us must protect confidential information and trade secrets belonging to CIGNA.

CIGNA's Funds: CIGNA funds are to be used responsibly and solely for CIGNA business. 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. We should only seek reimbursement for actual, reasonable and authorized business expenses.

Our Pledge to Our Customers, Clients and Business Partners Across the Globe: Integrity in the Marketplace

“Our customers – the millions of individuals we serve around the world – are at the center of everything we do at CIGNA. This focus includes how we behave and interact with our customers, and with each other. We need to hold ourselves to the highest standards of ethics and integrity when it comes to business transactions.”

Bert Scott, President, U.S. Commercial Markets

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 professionals and vendors, paying claims, 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, but 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, though, are very complex. If you are unsure of appropriate business practices, you should consult with your compliance officer or local legal counsel.



DECISION POINT

Fair Business Practice Do's 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 department before obtaining information from non-public 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.

Integrity in the Marketplace

Policies* and Procedures

Anti-corruption Compliance
Antitrust and Fair Competition
Antitrust Compliance Guidelines
Communications and Fair Disclosure
Economic Sanctions and Trade Restrictions
Enterprise Privacy Policies
Information Protection
Information Protection Standards
Securities Transactions & Insider Trading
Supply Chain Management Policy
Trade Practices Policy

**Other local policies may also apply.*

Key Contacts (See page 16)

FAQs



Our Pledge to Our Customers, Clients and Business Partners Across the Globe: Integrity in the Marketplace

Engage in Open, Fair and Accurate Business Communications

CIGNA's relationships with customers and business partners depend on appropriate channels for full discussion and providing accurate information. The Company recognizes and encourages various ways we can communicate to promote our business and manage working relationships, such as social networking media (blogs, chat rooms, and wiki sites).

We cannot misstate facts about our business, or conceal information necessary to fairly operate our business. You should only speak on behalf of CIGNA if you have permission – and any information you provide must be complete, fair, accurate, timely and understandable. You should direct all media inquires to Corporate Communications. In addition, you should never give the impression that you are speaking on behalf of CIGNA in any personal communication.



Decision Point

Social Networking

Q. What should I keep in mind if I'm on a social networking site?

A. You must not disclose confidential information or sensitive information. Harassing, discriminatory, or profane language should not be used. And, give very careful thought before expressing religious or political views or introducing potentially controversial topics. Please consult the Communications and Fair Disclosure policy for additional guidance.



Decision Point

Information Protection

Do's and Don'ts

Do: Know that CIGNA has four categories of information: public, proprietary, restricted and highly sensitive. Understand how to handle each securely.

Don't: Install unapproved desktop modems, analog lines or wireless services.

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

Don't: Email or save CIGNA work to your home computer.

Manage Suppliers and Contractors Diligently

We expect that our suppliers and contractors will conduct all activities on behalf of the Company consistent with our Code and Principles and related policies, and according to their contracts with CIGNA. We must be diligent in assuring that these parties live up to their obligations. Business partners are also expected not to create incentives for anyone at CIGNA to violate our Code and Principles, Company policy or the law.

Protect Customer and Employee Privacy, and Client Confidentiality

Our customers, employees and clients expect us to carefully handle and protect the personal and business information they share with us – including individually identifiable health information. You should never compromise their trust by disclosing private or sensitive information, other than to someone who legitimately needs to know.

Classifications of personal information or business data might differ by country, state or municipality. You are responsible for knowing and complying with all information privacy and security laws that apply to your role at CIGNA. Information privacy and security requirements are complicated. If you have any questions about information privacy or security requirements, contact your manager, compliance officer or the Enterprise Privacy Office.



Decision Point

Report Disclosures of Sensitive or Non-Public Information

Q. What if I accidentally disclose information that is sensitive or not public?

A. If you believe that an unintentional disclosure of sensitive or non-public information may have occurred, you should immediately contact CIGNA Legal and Public Affairs (for International, contact your local legal department or compliance officer).

Our Pledge to Our Customers, Clients and Business Partners Across the Globe: Integrity in the Marketplace

“As a leading global health service company, we must continue to meet 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. We must also recognize that we’re dealing with individual countries and governments that each have unique laws and regulatory frameworks.”

Bill Atwell, President, CIGNA International

Honor Economic Sanctions and Trade Restrictions

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

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

We work for a global company. This means different 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.

Take a Stand against Bribery and Corruption

We must never use improper means to influence another party’s business judgment. That means, among other things, that no CIGNA employee, director, agent or independent contractor, or anyone else acting on CIGNA’s behalf, 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 to pay something of value to a government official or employee to obtain or retain business or secure an unfair business advantage.

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.

Trade Securities Legally

There are strict laws that prohibit the use of insider information when buying, selling or trading publicly traded securities, including CIGNA securities. You must not buy, sell, or trade CIGNA securities – or the securities of other companies about which you have insider information – until that information becomes public.

Insider information can take many forms, but generally is considered to influence an investor’s decision to buy, sell or hold securities in a company. Often, it involves information affecting a company other than CIGNA, but which you learn about as a CIGNA employee.

Because insider information is extremely valuable, handle it 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 broadcast codes; and don’t tell others at CIGNA unless they must know for business reasons.



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 public hospital, candidates for political office, and officers or employees of international government organizations.



Decision Point

Examples of Insider Information

- Financial information
- New contracts, products or business growth plans
- Major organizational changes

Our Pledge to Governments Around the World: Integrity in the Public Sector

“As a respected health service organization, we have a responsibility to act with integrity in all we do, including any and all dealings with government officials. This is critical to helping us achieve our mission of improving the health, well-being and sense of security of those we serve.”

Jeff Kang, M.D., M.P.H., Chief Medical Officer

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 U.S. 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 U.S.



Decision Point

Contact Government Officials Responsibly – Do's and Don'ts

Do: Contact Regulatory and State Government Affairs, 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 State Government Affairs Department, 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 in the Public Sector

Policies* and Procedures

Anti-corruption Compliance

False Claims

Government Contracts and Anti-kickback

Political Contributions/
Government Contacts

**Other local policies may also apply.*

[Key Contacts](#) (See page 16)

[FAQs](#)



Our Pledge to Governments Around the World: Integrity in the Public Sector

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 U.S., 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 possible violation when you know or suspect that fraud or abuse of this type has been committed.

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 with the government. 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.



Our Pledge to the Communities We Serve: Integrity as a Socially Responsible Corporate Citizen

“At CIGNA, we are uniquely positioned to promote health and wellness around the globe. Every day, our 30,000 employees are making a meaningful difference in the lives of others. We are making social investments in the communities in which we operate, and we are working ethically and transparently.”

Maggie Fitzpatrick, Chief Communications Officer

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. We must keep in mind that any use of CIGNA equipment, supplies, time, facilities, phones or administrative support in connection with any sort of political activity would not only be a misuse of Company assets, but could also be considered a “political contribution” and may violate laws and CIGNA’s policies that apply to corporate contributions.

Make Donations Consistent with Company Giving

CIGNA provides charitable donations, sponsorships and contributions for educational, humanitarian and social projects. 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 not-for-profit organizations whose charitable goals are compatible with CIGNA’s policies.

Before you use CIGNA funds to make a monetary charitable contribution; donate to a charitable organization; or otherwise donate or allow the use of CIGNA assets by or for such an organization, you must obtain written approval from the Executive Director of Civic Affairs. You must submit the request via the locally-approved Charitable Contributions Request Form.

Integrity as a Socially Responsible Corporate Citizen

Policies* and Procedures

Charitable Contributions
Charitable Contributions
Request Form
Political Contributions/
Government Contacts

**Other local policies may also apply.*

[Key Contacts](#) (See page 16)

[FAQs](#)



Decision Point

Company Giving

Q. I have my manager’s support for CIGNA to participate in a small local charity event. Why do I still 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, non-profit organizations and potential customers.

Key Contacts

CIGNA has many options to help you discuss issues or report concerns:

Contact	Purpose
Your Manager	Your best contact for workplace issues
Human Resources Generalist (HRG) Your CIGNA Life Service Center +1.800.551.3539* (in U.S.) Your local HR Representative (outside U.S.)	Employment concerns
CIGNA Information Protection (CIP) CIGNAInformationProtection@CIGNA.com +1.800.472.3372* ("+1.800.4SafePC*")	Help with Information Protection issues
Global Corporate Security & Investigations +1.800.222.0852* +1.215.761.6270	Report thefts of CIGNA assets
Enterprise Compliance Department U.S.: http://home.CIGNA.com/CIGNAPage.aspx?page=6890 International: http://home.CIGNA.com/CIGNAPage.aspx?page=667	Advice and interpretation of our Code and Principles and supporting policies
Enterprise Privacy Office PrivacyOffice@CIGNA.com	Advice and policy interpretation on Privacy issues
Ethics Help Line** Non-European Team Members: CIGNAEthicsHelpline.Alertline.com European Team Members: CIGNAEuEthicsHelpline.Alertline.com Toll-free: +1.800.472.8348* email: ethics@CIGNA.com	Advice and interpretation of our Code and Principles, and to Report Concerns
Local Legal Department http://Home.CIGNA.com/CIGNAPage.aspx?page=9193	Advice and interpretation of law and regulations

* Note: If you are calling from outside of the U.S., and you would like the call to be free, you will need to dial your local access number for AT&T Direct Service and then dial the number provided above. If you are not aware of the access number, it can be located by clicking [here](#).

** The Ethics Help Line is managed by Corporate Audit, an independent function reporting to CIGNA's Board of Directors. The +1.800 number is staffed 24 hours a day/7 days a week, and calls can be handled in multiple languages.

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.

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

Ethics Help Line ■ +1.800.472.8348

