



SUPPLIER CODE OF ETHICS

Together, all the way.®





Cigna Corporation is a global health service company dedicated to improving the health, well-being and peace of mind of those we serve. Our success depends on earning, building and keeping the trust of our clients, customers, employees and business partners. We earn, build and keep this trust through responsible business practices, corporate citizenship and the provision of services that meet the needs of our clients, customers, employees and business partners.

In addition, we pride ourselves on our commitment to compliance and to acting ethically and with integrity in all our interactions. We expect the same commitment from the suppliers identified by our supply chain management organization (“Suppliers”).

As part of our Cigna Supplier Code of Ethics (“Code”), we request that our Suppliers demonstrate ethics, compliance and integrity in three pillars.

The agreement between a Supplier and Cigna will reflect our expectations as they relate to the conduct of the Supplier, including expectations set by this Code. If there is a conflict between this Code and an executed agreement between the Supplier and Cigna, the terms of the agreement will govern.



## I. INTEGRITY IN HUMAN RIGHTS AND LABOR

- › Act as responsible corporate citizens
- › Use workers of legal age, and pay at least minimum wage
- › Comply with all applicable nondiscrimination laws



## II. INTEGRITY IN BUSINESS CONDUCT

- › Protect Cigna assets, intellectual property and confidentiality
- › Protect Cigna customer, employee and client privacy
- › Not profit from or disclose nonpublic information acquired through Cigna
- › Disclose any actual or potential conflicts of interest
- › Comply with all anti-corruption laws
- › Support a diverse and inclusive supply chain



## III. INTEGRITY IN THE ENVIRONMENT

- › Comply with all applicable environmental laws and regulations
- › Minimize and reduce waste, reduce carbon footprints, and conserve water

This Code outlines the principles and guidelines Cigna requests its Suppliers to adhere to when providing services or products to Cigna. Suppliers should ensure that their suppliers and subcontractors also adhere to the principles and guidelines outlined in this Code. Cigna may terminate any business relationship for failure to comply with this Code.

# INTEGRITY IN HUMAN RIGHTS AND LABOR

## Community

Suppliers should strive to be responsible citizens and create positive impacts in the communities where they operate through the delivery of products and services and through civic and/or philanthropic activities.

## Child labor and forced labor

Suppliers shall not use workers under the legal age of employment in the jurisdiction where work is performed. If a jurisdiction does not define a minimum age for employment, the minimum age for purposes of this Code is fifteen (15). When a Supplier employs minors, the Supplier must follow all laws pertaining to employment of minors. Suppliers must neither permit nor tolerate any use of indentured servants, slaves or any other form of involuntary labor.

## Wages and working hours

Suppliers must comply with all applicable minimum wage laws. Suppliers must comply with all applicable workplace laws, including laws governing maximum working hours, rest periods and overtime payments. Suppliers should pay their workers in a timely manner and respect workers' rights to a living wage; this includes ensuring that compensation is enough to meet basic needs, provides some discretionary income and is not subject to deductions, except as otherwise authorized by the employee and permitted by applicable law.



## Health and safety

Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they operate. Suppliers should provide workers with access to clean, safe and reasonable working conditions, as well as clean, safe and reasonable living conditions in the event that housing is provided to workers.



## Freedom of association

Employees of Suppliers must be free to join organizations of their own choosing and to bargain collectively in accordance with the laws in their jurisdiction. Employees must not be subject to intimidation or harassment in exercising their right to join or not join any organization.



## Nondiscrimination and harassment prevention

Suppliers must not discriminate in hiring, promotions, salary, or any other terms or conditions of employment based on 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. Suppliers should not tolerate any form of harassment, whether verbal or physical, in the workplace.

# INTEGRITY IN BUSINESS CONDUCT



## **Assets**

Suppliers must demonstrate proper care and use of Cigna's assets at all times. Suppliers, with permission from Cigna, may use Cigna assets only to provide services or fulfill their contractual obligations to Cigna. Cigna assets include real property, intellectual property, business records, equipment and supplies, computers, tablets, telephones, voicemail and email systems, and other electronic data. The user IDs and passwords Cigna issues to Suppliers and their employees are for the exclusive use of the intended recipient only, for the specific business purpose for which Cigna issued them, and not to be shared with others. Suppliers must promptly report any activities that may compromise the security or confidentiality of Cigna's data or information systems.

## **Audits and monitoring**

Suppliers should create and maintain policies and procedures to monitor and audit compliance with laws and regulations affecting its business. Cigna may request documentation and supporting evidence of compliance to Supplier facilities or business practices associated with their environmental, social and governance (ESG) standards.

## **Intellectual property and confidentiality**

Suppliers must protect Cigna's intellectual property and maintain the confidentiality of Cigna trade secrets and nonpublic information.

## **Business records and communications**

Suppliers must provide accurate, complete and timely reports and communications regarding financial conditions and operations.

## **Conflicts of interest**

Suppliers should disclose to Cigna any actual or potential conflicts of interest in doing business with Cigna, including whether any of a Supplier's workers, investors or otherwise affiliated persons have a familial relationship with anyone at Cigna who can make decisions affecting the Supplier's business with Cigna.

## **Privacy**

Suppliers must protect Cigna customer, employee and client privacy and confidentiality in accordance with the terms of the agreement between the Supplier and Cigna. Suppliers are responsible for knowing and complying with all information protection and privacy laws that apply to their obligations with Cigna. Suppliers may only collect, use, retain or share information needed to fulfill its contractual obligations to Cigna, and they must immediately notify Cigna of any potential data or privacy breach, unless otherwise stated in an executed agreement with Cigna.

## **Diverse and inclusive supply chain**

Suppliers should provide certified small and/or diverse supplier businesses the opportunity to participate in Cigna's supplier base through subcontract or other work orders in support of our business.

## **Insider trading**

Suppliers cannot purchase, sell or trade Cigna securities while in possession of material nonpublic information regarding Cigna. Suppliers and Supplier employees must never directly or indirectly disclose nonpublic information acquired by conducting business with Cigna.



## INTEGRITY IN BUSINESS CONDUCT (CONTINUED)



### **Anti-Corruption**

Suppliers must not pay or offer anything of value, including gifts, meals and entertainment, to any government official, employee of a state-owned enterprise or political candidate for office in order to improperly influence such person or improperly obtain or retain business. Cigna expects all Suppliers to comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Anti-Kickback Statute and all other

applicable anti-corruption laws. Before Cigna enters into any agreement with a potential Supplier, the potential Supplier must undergo an anti-corruption review per Cigna's Anti-Corruption Contract Review Guideline.

### **Antitrust**

Suppliers must not enter into agreements or take actions that unreasonably restrain trade or are deceptive and misleading.

### **Economic sanctions and trade restrictions**

Cigna will not do business with Suppliers that operate in or derive revenue from countries sanctioned by the U.S. Government or with Suppliers that are on any list of sanctioned persons or entities as designated by the U.S. Government. Suppliers should also not participate in any boycott of a country unless sanctioned by the U.S. Government.

### **True and correct claims**

If Suppliers participate in submitting claims to a government or government agency, they must be true and accurate. Suppliers must promptly report any incident of known or suspected fraud or abuse of this type. Suppliers must abide by any legal requirements pertaining to government contracting.

## INTEGRITY IN THE ENVIRONMENT

### **Environmental footprint**

As a company whose mission is to improve the health, well-being and peace of mind of those we serve, we take a precautionary approach to our environmental sustainability efforts. We also aim to serve as a connector and catalyst for change to protect global access to healthy air, water, soil and food. Because we are keenly focused on the connection between planetary health and human health, we consider managing environmental risks and opportunities to be important to our business; thus through our supplier sustainability efforts, we aim to do business with companies that are also focused on reducing energy and water consumption and lowering emissions and waste from their operations.

### **Environmental compliance**

Suppliers must abide by all federal, state and local environmental laws and regulations.



## WHO TO CONTACT

No code can possibly answer every question or anticipate every situation. A Supplier may ask questions or report to Cigna any concerns regarding compliance with this Code, or other standards pertaining to Suppliers' provision of services, by contacting their Cigna relationship manager or the Cigna Ethics Help Line, which is available 24 hours a day, seven days a week in the United States by calling **800.472.8348** and outside the United States by following the dialing instructions located at [cigna.ethicspoint.com](https://cigna.ethicspoint.com). Suppliers may also access the Help Line via the web at [cigna.ethicspoint.com](https://cigna.ethicspoint.com) or via email at [Ethics@Cigna.com](mailto:Ethics@Cigna.com). Suppliers can report anonymously on the Cigna Ethics Help Line.

### RESPONSIBLE BUSINESS DOCUMENTS

[Code of Ethics | Cigna](#)

[Corporate Responsibility | Cigna](#)

[Environmental Policy Statement | Cigna](#)

[Privacy Information | Cigna](#)



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