

ANTI-HUMAN TRAFFICKING POLICY

I. Purpose and Background

Cigna Corporation (“Cigna” or the “Company”) is committed to prohibiting trafficking in persons. As a contractor to the United States Federal Government, Cigna and its Workforce Members, as defined below, must not engage in certain practices. This Anti-Human Trafficking Policy (“Policy”) identifies the practices in which Cigna and its Workforce Members must not engage.

II. Definitions

As used in this Policy and any related procedures adopted by Cigna, “Workforce Members” means Cigna’s directors, agents and Workforce Members, a group which includes employees (whether full- or part-time), consultants, vendors, volunteers, trainees, and other persons whose conduct, in the performance of work for Cigna or one of its wholly owned or controlled subsidiaries, is under the direct control of such entity, whether or not they are paid by the Cigna corporate entity.

III. Scope

This Policy applies to Workforce Members. Where local country laws contain mandatory requirements that differ from the provisions of this Policy, those requirements will govern for individuals working in those countries. Please refer to your local legal department or compliance officer if you have questions about your local laws or policies.

Violations of this Policy may result in disciplinary action, including termination of employment and, depending on the jurisdiction, criminal and/or civil penalties.

IV. Policy Statement

Cigna and its Workforce Members shall not:

1. Engage in trafficking in persons during the period of performance of the contract with the United States federal government (“Contract”);
2. Procure commercial sex acts during the period of performance of the Contract;
3. Use forced labor in the performance of the Contract;
4. Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identity or immigration documents, such as passports or drivers’ licenses, regardless of issuing authority;
5. Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information, or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;

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6. Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
7. Charge employees recruitment fees;
8. With regard to certain transportation costs:
 - i. Fail to provide return transportation or pay for the cost of return transportation upon the end of employment—
 - a. For an employee who is not a national of the country in which the work is taking place and who was brought into that country for the purpose of working on a U.S. Government contract or subcontract (for portions of contracts performed outside the United States); or
 - b. For an employee who is not a United States national and who was brought into the United States for the purpose of working on a U.S. Government contract or subcontract, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee (for portions of contracts performed inside the United States);
 - ii. The requirements of paragraphs (8)(i)(b) of this Policy shall not apply to an employee who is—
 - a. Legally permitted to remain in the country of employment and who chooses to do so; or
 - b. Exempted by an authorized official of the contracting agency from the requirement to provide return transportation or pay for the cost of return transportation;
 - iii. The requirements of paragraph (8)(i)(b) of this Policy are modified for a victim of trafficking in persons who is seeking victim services or legal redress in the country of employment, or for a witness in an enforcement action related to trafficking in persons. Cigna shall provide the return transportation or pay the cost of return transportation in a way that does not obstruct the victim services, legal redress, or witness activity. For example, Cigna shall not only offer return transportation to a witness at a time when the witness is still needed to testify. This paragraph does not apply when the exemptions at paragraph (8)(ii)(b) of this Policy apply.
9. Provide or arrange housing that fails to meet the host country housing and safety standards; or
10. If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

V. Who to Contact with Questions

Directors, agents and Workforce Members may contact the Cigna's Chief Ethics Officer with any questions regarding this Policy.

VI. Effective Date

This Policy replaces and supersedes any previously issued policy on this topic and is effective as of January 1, 2018. Enterprise Compliance will communicate interim updates to this Policy through a notice to appropriate Senior Management and Workforce Members.

VII. Applicable Laws, Regulations, and References

The Code of Ethics and Principles of Conduct
48 CFR 52.222-50 – Combatting Trafficking in Persons

