

# PROHIBITION AGAINST SEXUAL AND OTHER UNLAWFUL HARASSMENT

## I. Purpose

Cigna is committed to maintaining a positive and productive work environment in which all individuals are treated with respect and dignity. Cigna complies with all applicable laws related to unlawful discrimination and harassment in each jurisdiction where Cigna operates around the world.

## II. Scope

This policy applies to all applicants, employees, and other persons involved in Cigna's operations, regardless of their position, and prohibits harassing conduct by any individual, including nonsupervisory employees, supervisors, and managers. Additionally, this policy protects employees from unlawful harassment in the workplace by third parties, such as customers, vendors, clients, visitors, agents, or contractors. The workplace includes actual worksites, any setting in which work-related business is being conducted, and company-sponsored events. Unlawful harassment that occurs by telephone, email, voicemail, messaging systems, or other means of communication are likewise prohibited under this policy.

## III. Policy Statement

All employees, customers, contractors, vendors, and visitors to the workplace are entitled to enjoy a positive, productive, and respectful environment that is free of sexual harassment. Sexual harassment includes unwanted sexual advances, requests for sexual favors, or visual, verbal or physical conduct of a sexual nature when:

- ▶ Submission to such conduct is made a term or condition of employment; or
- ▶ Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- ▶ Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Additionally, all other forms of unlawful harassment are prohibited, including but not limited to harassment based on race, color, age, disability, sex (including pregnancy), childbirth or related medical conditions including but not limited to lactation, sexual orientation, gender identity or expression, veteran or military status, religion, national origin, ancestry, marital or familial status, genetic information, status with regard to public assistance, citizenship status or any other characteristic protected by applicable federal, state, or local equal employment opportunity laws. Discrimination based on such protected characteristics is also prohibited.

Examples of prohibited conduct include, but are not limited to, the following:

- ▶ Offering a promotion in exchange for sexual favors
- ▶ Taking or threatening to take adverse employment action against someone who had a negative response to sexual advances
- ▶ Unwanted sexual advances and propositions

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- › Leering, making sexual gestures, or displaying sexually suggestive objects or pictures
- › Making sexually suggestive or obscene comments verbally or in writing about an individual's body or dress
- › Written or verbal taunting, jokes, threats, epithets, derogatory comments or epithets based on sex or any other legally protected characteristic
- › Physical conduct such as touching, assaulting, or impeding an individual's normal movements based on sex or any other legally protected characteristic

All employees are responsible for complying with this policy and for supporting its objectives by demonstrating respect for fellow employees and other parties doing business with Cigna. All supervisors and managers are responsible for implementing this policy and taking steps to prevent harassment and discrimination; ensuring that employees under their supervision comply with this policy; and acting in a manner that is consistent with this policy.

Violations of this policy can subject an employee to disciplinary action as well as civil penalties against both the employee and Cigna. Federal and state laws prohibit discrimination and harassment based on legally protected characteristics.

#### **IV. Reporting Complaints to Cigna**

If you believe you have been subjected to unlawful discrimination or harassment, you are encouraged to firmly and promptly notify the offender that his or her behavior is unwelcome. In addition or alternatively, you should promptly report the incident, verbally or in writing, to any manager or supervisor, your Human Resources Business Partner (HRBP), or the Ethics Help Line at 1.800.472.8348. If you have witnessed any conduct that may be inconsistent with the requirements of this policy, you should promptly report the incident to any manager or supervisor, your HRBP, or the Ethics Help Line at 1.800.472.8348.

Any supervisor, manager or HRBP who witnesses or receives a report or complaint of discrimination or harassment must immediately notify Employee Relations, the Cigna Employee Service Center, or the Ethics Help Line at 1.800.472.8348.

Complaints may be filed with Cigna using the complaint form in Section IX. You are not required to use this form and may report your complaint verbally or in any other format you choose.

Any supervisor, manager or HRBP representative who witnesses or receives any report or complaint of discrimination or harassment under this policy and fails to notify the proper parties or take corrective action

pursuant to this policy will be subject to appropriate disciplinary action, up to and including termination.

#### **V. Investigating the Complaint**

All complaints will be investigated promptly, thoroughly, and impartially by your local HRBP or Employee Relations. All appropriate parties will be afforded the opportunity to participate. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

Confidentiality will be maintained throughout the investigation to the extent practical and appropriate. Complainants may receive timely and appropriate information regarding the progress and/or outcome of the investigation.

Cigna will take appropriate and proportionate corrective measures if it determines harassment has occurred, even if such harassment may not be legally actionable harassment. Any employee who is found to have violated this policy will be subject to appropriate disciplinary action, up to and including termination.

#### **VI. Protection Against Retaliation**

Intimidation, coercion, threats, retaliation or discrimination against any person who complains of or reports harassment; objects to such conduct; or files, testifies, assists or participates in any manner in any investigation, proceeding or hearing conducted by Cigna or a governmental enforcement agency is prohibited. For example, an employee may not be terminated, demoted, or disciplined because he or she objected to harassing conduct, made a complaint of harassment, participated in a harassment investigation, or otherwise engaged in protected activities.

If you believe you have been subjected to retaliation, or believe that another individual has been subjected to retaliation, you should report this in the same manner as discussed in Section IV above on Reporting Complaints. Any report of retaliation will be investigated in a thorough, prompt, and objective manner. Any employee who is found to have engaged in any form of retaliation will be subject to appropriate disciplinary action, up to and including termination.

#### **VII. Who to Contact with Questions**

Questions regarding the requirements of this policy and your obligations should be directed to your immediate manager, HRBP, Cigna Employee Service Center, the PeopleResources Center (PRC) or your local legal department.

## VIII. Federal and State Agency Information

The Equal Employment Opportunity Commission (EEOC) will accept and investigate charges of unlawful discrimination and harassment in violation of Title VII of the Civil Rights Act of 1964,

at no charge to the complaining party. The nearest office of the EEOC can be found in your local directory or online at [www.eeoc.gov](http://www.eeoc.gov).

Many states and municipalities have their own laws prohibiting discrimination as well as their own agencies to enforce those laws. Below is a list of state agencies that will also accept and investigate charges of unlawful discrimination and harassment. This is not an exhaustive list; if you live in a state that is not noted below, you may still have access to a state agency that may accept and investigate a charge of unlawful discrimination and harassment.

If you wish to file with the EEOC or a state agency, you should contact them directly to obtain further information about their processes and time limits.

### California

California Department of Fair Employment and Housing  
2218 Kausen Drive, Suite 100  
Elk Grove, CA 95758  
800.884.1684 (voice), 800.700.2320 (TTY) or  
California's Relay Service at 711  
[contact.center@dfeh.ca.gov](mailto:contact.center@dfeh.ca.gov)  
<https://www.dfeh.ca.gov>

### Illinois

Illinois Department of Human Rights (IDHR) Chicago:  
312.814.6200 or 800.662.3942  
Chicago TTY: 866.740.3953  
Springfield: 217.785.5100  
Springfield TTY: 866.740.3953  
Marion: 618.993.7463  
Marion TTY: 866.740.3953  
<https://www2.illinois.gov/dhr/Pages/default.aspx>  
Illinois Human Rights Commission (IHRC) Chicago:  
312.814.6269  
Chicago TTY: 312.814.4760  
Springfield: 217.785.4350  
Springfield TTY: 217.557.1500  
<https://www2.illinois.gov/sites/ihrc/Pages/default.aspx>

### Maine

Maine Human Rights Commission  
51 State House Station  
Augusta, ME 04333-0051  
207.624.6290  
<https://www.maine.gov/mhrc/home>

### Massachusetts

The Massachusetts Commission Against  
Discrimination (MCAD)

#### Main Office

One Ashburton Place, Room 601, Boston, MA 02108  
617.994.6000 TTY: 617.994.6196

#### Regional Offices

New Bedford Office: 800 Purchase Street, Room 501,  
New Bedford, MA 02740, 508.990.2390

Springfield Office: 424 Dwight Street, Room 220,  
Springfield, MA 01103, 413.739.2145

Worcester Office: 484 Main Street, Room 320,  
Worcester, MA 01608, 508.453.963  
[www.mass.gov/mcad](http://www.mass.gov/mcad)

### New York

NYS Division of Human Rights One Fordham Plaza,  
Fourth Floor Bronx, NY 10458  
718.741.8400  
[www.dhr.ny.gov](http://www.dhr.ny.gov)

New York City Commission on Human Rights  
Law Enforcement Bureau of the NYC Commission on  
Human Rights 40 Rector Street, 10th Floor  
New York, NY 311 or 212.306.7450  
[www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml)

### Rhode Island

The Rhode Island Commission for Human Rights 180  
Westminster Street, 3rd Floor  
Providence, RI 02903  
401.222.2661  
<http://www.richr.ri.gov/>

### Vermont

Vermont Attorney General's Office, Civil Rights Unit  
109 State Street  
Montpelier, VT 05609,  
802.828.3171 (voice/TDD)  
<https://ago.vermont.gov/>

## IX. Sample Complaint Form

### Complainant Information

Name:

Work Address:  Work Phone:

Job Title:  Email:

Select Preferred Communication Method:  Email  Phone  In person

### Supervisor Information

Immediate Supervisor's Name:  Title:

Work Phone:  Work Address:

### Complaint Information

1. Your complaint is against the following individual(s):

Name:  Title:

Work Address:  Work Phone:

Relationship to you:  Supervisor  Subordinate  Co-worker  Other

2. Please describe the conduct you are complaining of and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) the complained-of conduct occurred:

Is the complained-of conduct continuing?  Yes  No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint.

*Question five is optional, but may help the investigation.*

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

6. If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature:  Date:

*While this policy is generally applicable to all US employees, the policy, or portions of it, may not apply to employees who are represented by a union.*

