

PROTECTION AGAINST RETALIATION

Cigna prohibits retaliation, intimidation, coercion, threats, harassment and discrimination against any member of its Workforce for making good faith reports or complaints of Compliance Concerns; objecting to conduct that may cause or create a Compliance Concern; or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by Cigna or a governmental enforcement agency relating to a Compliance Concern. A Compliance Concern is any suspected or actual violation of applicable law, regulation, or company policy, including allegations of violations of the Code of Ethics and Principles of Conduct; discrimination; harassment; suspected fraud, waste, or abuse; or any other unlawful or inappropriate activity. This Policy also protects anyone who participates in an investigation into such complaints. For example, an employee may not be discharged, demoted, or otherwise subject to an adverse job action for objecting to conduct that he or she had a good faith belief would create a Compliance Concern, participating in an internal or external investigation of a Compliance Concern, or engaging in any other protected activities.

Cigna prohibits employees from being retaliated against even if their complaints are proven unfounded by an investigation, unless the employee knowingly made a false allegation, provided false or misleading information in the course of an investigation, or otherwise acted in bad faith.

Reporting Retaliation

If you believe you or another Workforce Member have been subjected to retaliation in violation of this Policy, you should promptly report the perceived retaliation to an immediate supervisor or manager, or to a Workforce Member who belongs to the Enterprise Compliance Department, Law Department or Human Resources/Employee Relations. Reports may also be made through the Ethics Help Line at [Cigna.ethicspoint.com](https://cigna.ethicspoint.com).

Together, all the way.®

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The Ethics Help Line may also be reached by telephone:

- ▶ In the United States, call toll-free by dialing 1.800.472.8348.
- ▶ Outside the United States, call 1.800.472.8348 toll-free and use these access codes.

Reports made to the Ethics Help Line are confidential and may be made anonymously where local laws allow.

While the initial report of a violation of this Policy may be made to a Workforce Member, that person – no matter his or her position within Cigna – must then report the suspected violation to the Ethics Help Line or Cigna’s Chief Ethics Officer. A failure to do so may result in appropriate disciplinary action, up to and including termination.

All complaints will be investigated thoroughly and where applicable, appropriate disciplinary action shall be issued. Employees have an obligation to participate in good faith in any internal investigation of retaliation.

Any member of Cigna’s Workforce who deliberately makes a false accusation for the purpose of harming or retaliating against another employee will be subject to discipline.

Any member of Cigna’s Workforce who reports a Compliance Concern regarding his or her own inappropriate or illegal actions is not exempt from the consequences of those actions. However, prompt and forthright disclosure of an error by any Workforce Member, even if the error constitutes inappropriate or illegal performance, will be considered a positive constructive action by the Workforce Member.

Discipline

Violators of this Policy may be subject to disciplinary action, up to and including termination.

