



CIGNA CODE OF ETHICS AND PRINCIPLES OF CONDUCT





Our mission is to
improve the health,
well-being, and
peace of mind of
those we serve.

FULFILLING
OUR
MISSION

TABLE OF CONTENTS

WE ARE CIGNA

A message from the Chairman and CEO	4
A message from the Chief Compliance Officer	5
About Cigna	6
Our mission	7
Our values	7

WE TAKE PRIDE IN CIGNA AND OUR CODE

Our code applies to you	8
Our individual responsibilities	9
Speak up without fear	9
People leader reminders	11

WE VALUE A RESPECTFUL AND SAFE WORKPLACE

Respect for our customers and patients	12
Harassment is prohibited	13
Promote equal employment opportunity	14
Communicate openly, respectfully and honestly	14
Promote a safe workplace	14
Respect the environment	15
Make positive contributions to advance health and well-being	15

WE DO THE RIGHT THING

Keep private information private	16
Never bribe nor accept bribes	17
Facilitation payments are strictly prohibited	18
Know the rules about gifts and entertainment	18
Manage suppliers and contractors diligently	19
Don't trade on inside information	21
Maintain firewalls between competing business lines	21
Keep accurate records	21
Prevent money laundering	21
Make corporate donations to nonprofits through our charitable process	22
Participate in the political process with care	22
Adhere to fraud, waste and abuse laws	22
Follow our rules for working with government agencies	23
Cooperate with government audits or investigations	24
Contact government officials responsibly	24
Disclose exclusion or criminal behavior	25
Disclose licensure or certification discipline	25

WE SAFEGUARD OUR COMPANY

Protect Cigna's assets	26
Avoid conflicts of interest	27
Communicate accurately and fairly	28
Waivers to our code	29

WE COMPETE FAIRLY AS A GLOBAL COMPANY

Local laws	30
Respect fair business practices and competition	31
Honor economic sanctions and trade restrictions	32



We put integrity first and live our values and mission through ethical decision-making.

A MESSAGE FROM THE CHAIRMAN AND CEO



Committing to integrity, each and every day

Cigna is privileged to serve approximately 190 million customer and patient relationships around the world. As we see every day, our clients, customers and patients are demanding more from health care – including greater affordability, predictability and simplicity. Cigna understands that to meet these needs, we must innovate, adapt and deliver value to our stakeholders, all while keeping our promise to act with honesty, a sense of fairness and transparency.

To reflect the organization's core values – and our commitment to legal and regulatory compliance – we are guided by Cigna's Code of Ethics and Principles of Conduct.

Our Code is the foundation for our interactions with each other and with our key stakeholders as it provides important and valuable guidance for our approximately 70,000 colleagues around the world. It also supports our ability to live our values every day, and enables us to truly embody our mission of improving the health, well-being and peace of mind of those we serve.

My ask for each of you is that you do your part to make integrity – not just a priority – but an imperative. Each of us is responsible for speaking up when we believe our commitment to ethical behavior, or our core values, may be compromised. When you do, Cigna stands firmly behind you! Our [Protection Against Retaliation Policy](#) will always protect employees who report a concern in good faith.

Thank you for your continued commitment to do what is right for our clients, customers, patients, other stakeholders – and each other. I'm privileged to lead a team that lives our values, puts integrity first and understands the importance of conducting our business in an ethical and lawful manner.

A handwritten signature in black ink, reading "David M. Cordani".

David M. Cordani
Chairman and CEO
Cigna Corporation

A MESSAGE FROM THE CHIEF COMPLIANCE OFFICER



We care deeply about the patients, customers, coworkers, communities and governmental agencies we serve. Maintaining the trust of these stakeholders is critical to Cigna's success.

Trust is fostered not only by legal and regulatory compliance but, equally important, by acting with integrity. We achieve this by delivering on Cigna's mission and values through ethical decision-making, accountability and operational transparency. Our Code of Ethics and guiding principles provide guidance on how to lead with integrity in all our interactions.

Together, we all play a part in fostering a culture in which all colleagues feel comfortable being ethical, honest and transparent. Each of us has a duty to speak up, in good faith, when we encounter a concern. In return, you are protected from intimidation or retaliation.

Business ethics goes beyond what we can or cannot do under applicable laws and regulations. Rather, it focuses on doing the right thing under any circumstance. To that end, while each of us is engaged daily in meeting competitive challenges and embracing opportunities to move our company forward, the pressure to succeed can never be an excuse to compromise our values and business ethics.

I am personally committed, as is every member of Cigna's leadership team, to ensuring that Cigna remains firmly rooted in the values reflected in our Code.

Compliance matters to us. We put integrity first in every decision we make, every single day.

Thanks for your commitment and support.

A handwritten signature in dark ink that reads "Katie Timm".

Katie Timm
Chief Compliance Officer
Cigna



ABOUT CIGNA

Cigna Corporation is a global health service company dedicated to improving the health, well-being and peace of mind of those we serve. Cigna delivers choice, predictability, affordability and access to quality care through integrated capabilities and connected, personalized solutions that advance whole person health. We put integrity first and we live our values and mission through ethical decision-making.

OUR MISSION

Our mission is to improve the health, well-being and peace of mind of those we serve.

OUR VALUES

Our values are the core of our culture. Our values guide how all 70,000 of us around the world work together, serve our customers, patients, clients, and communities, and deliver on our mission.

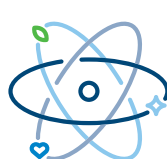
Our values in action.



We care deeply about
our customers, patients,
and coworkers



We partner, collaborate
and keep our promises



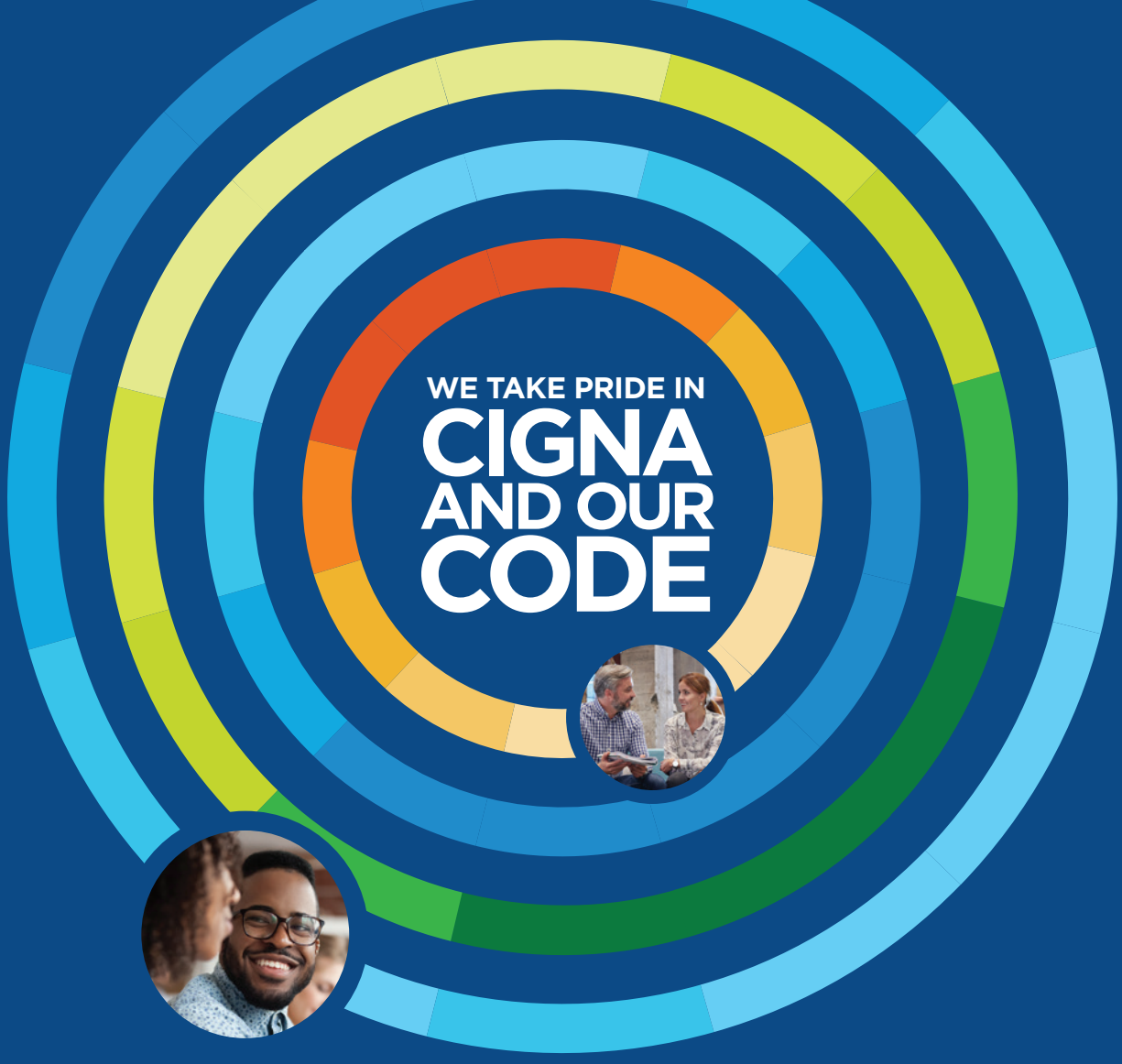
We innovate
and adapt



We act with speed
and purpose



We create a better
future - together



WE TAKE PRIDE IN
CIGNA
AND OUR
CODE

We do not look the other way if we see or suspect any action or inaction that seems unlawful or unethical.

OUR CODE APPLIES TO YOU

Our Code of Ethics and Principles of Conduct (our Code) applies to everyone, no matter their role, at Cigna Corporation and its controlled subsidiaries (collectively “Cigna” or “Company”). This means our Code applies to Cigna’s Board of Directors and all of Cigna’s workforce members, a group that includes full- and part-time employees, contract workers, temporary employees, and interns. Certain Company business partners working on our behalf, such as agents, affiliates, contractors, and consultants, are also expected to adhere to our Code, in addition to any contractual provisions that apply to their engagement with Cigna.

If a workforce member is bound by a collective bargaining agreement, and that agreement is not consistent with the Code, the collective bargaining agreement will govern.

OUR INDIVIDUAL RESPONSIBILITIES

At Cigna, we do more than just obey laws and regulations; we operate with integrity, transparency, and accountability. We must be respectful, truthful, transparent, and genuine in our interactions with our many stakeholders. Our individual actions always reflect Cigna’s values and must always follow our Code, our policies, and all applicable laws and regulations. We should know the policies and regulations that are applicable to our role and must complete all required compliance training.

We do not look the other way if we see or suspect, in good faith, any action or inaction that seems illegal or unethical. We report it, so that it can be addressed. No concern is too minor to report.

We care deeply about our customers, patients, and coworkers.

We share our concerns promptly and cooperate fully in any internal review, audit, or investigation, by providing complete, factual, and accurate information and preserving and timely producing relevant documentation in response to internal requests. Anyone who violates our Code, policies, or applicable law, impedes or improperly influences a review, audit, or investigation, or engages in conduct that is detrimental to the Company’s interests, will face corrective actions, up to and including termination of employment, consistent with our [Principles of Conduct – Disciplinary Action](#).

Our Code and policies cannot address every situation that we may face. In most cases, common sense and good judgment are the best guides. In the absence of specific guidance, there are questions you should ask yourself when facing a dilemma.





- › Are my actions consistent with Cigna's values?
- › Am I the right person to make this decision?
- › Does this adhere to Cigna's Code and policies, and the law?
- › Would I want this decision to be public?

If you answer "no" to any of these questions, you should contact your manager, a Compliance representative, a Human Resources representative, a member of the Legal Department, or the Ethics Office.

SPEAK UP WITHOUT FEAR

We should all speak up when we have questions or concerns.

When we have questions or concerns about whether or not something is ethical or appropriate, we may always seek guidance through our [Ethics Help Line](#). Our Ethics Help Line is available 24 hours a day, seven days a week by calling **+1.800.472.8348** in the United States, or by calling our international Ethics Help Line numbers available [here](#), or by accessing the Ethics Help Line online at [Cigna.ethicspoint.com](https://cigna.ethicspoint.com). When reporting a concern through the Ethics Help Line, you are encouraged to identify yourself to facilitate future communication. You may request to remain anonymous when permitted by law.

[Be HEARD](#) is Cigna's employment dispute resolution program for our U.S. employee population. It is designed to encourage open and honest conversations between employees and management, foster strong working relationships and maintain a rewarding, inclusive and engaging workplace. Cigna believes that the resolution of employment-related disputes is best accomplished when we bring together the people involved to discuss the issues, share concerns and partner in finding a solution that works for everyone. Please refer to the [Be HEARD](#) site for additional information.

Regardless of the mechanism you may use to raise a concern or issue, know that you are protected.

[Cigna's Protection Against Retaliation Policy](#) prohibits retaliation against any individual who, in good faith, reports violations of company policy or unlawful conduct, including allegations of violations of our Code of Ethics and Principles of Conduct, or inappropriate activity.

If you know of, or reasonably suspect, a violation of our Code, it is your responsibility to promptly report it.

All workforce members must report ethics and compliance concerns. Cigna's expectation of each workforce member is to report, in a timely manner, any event, incident, situation or conduct that he or she believes, in good faith, violates, or potentially

will violate, an applicable law or regulation or Cigna's Code of Ethics and Principles of Conduct, policies or procedures, including those devised to prevent fraud, waste and abuse. Please refer to the [Duty to Report Policy](#) for additional information.

Workforce members who observe, or receive a report of an ethics or compliance concern should refrain from conducting their own investigation and promptly report the matter. In keeping with Cigna's [Open Door Policy](#), compliance concerns may be reported initially to an immediate supervisor or manager or to a workforce member who belongs to the Enterprise Compliance Department, the Legal Department, or Human Resources/Employee Relations.

While the first point of contact may be a workforce member, that person – no matter their position within Cigna – must then report the compliance concern to the Ethics Help Line or to the Ethics Office. Violations of the [Duty to Report Policy](#) may result in disciplinary action, including termination of employment and, depending on the jurisdiction and the nature of the matter, criminal and/or civil penalties.

All reports are treated confidentially with information shared only on a need-to-know basis. Cigna conducts thorough and fair reviews and assessments. As warranted, the Chief Ethics Officer, General Auditor, General Counsel, Chief Compliance Officer, and/or their designees investigate alleged violations of our Code. Workforce members may also report violations to public officials for investigation and/or prosecution. If you are asked to participate in an investigation, you must fully cooperate, including by participating in interviews, providing truthful and complete answers and information, and by timely producing emails and other documents when requested.

If an investigation determines that a violation of the Code or Company policies has occurred, Cigna will take corrective steps, which may include disciplinary action against those involved up to, and including termination of employment.





When a colleague shares details about a compliance violation occurring outside of your department, how do you fulfill your duty to report it?

We will:

- › Speak up and report any concerns in good faith, even without knowing all the facts.
- › Refrain from conducting an individual investigation.
- › Come forward in a timely manner to a manager or other resource listed in the Code.



PEOPLE LEADER REMINDERS

If you manage people, you have additional compliance responsibilities. Managers lead by example. Managers also create a workplace that encourages workforce members to come forward with questions and concerns.

When our colleagues have an ethics or compliance concern, they will often raise it with a people leader first. Managers, compliance officers, human resources representatives, and members of the Corporate Audit Department must promptly forward reports of known or suspected compliance concerns to the Ethics Help Line. Managers should also engage the Ethics Office and Human Resources when misconduct is reported. Please refer to the [People Leader Action Guide](#) for more information.

Managers must never retaliate against anyone for sharing concerns in good faith, and they are obligated to prevent others from retaliating as well. When evaluating a workforce member's performance, managers consider the adherence to our Code. Managers may never encourage or direct workforce members to achieve business results at the expense of ethical conduct.

As people leaders, we will:

- › Be an example of ethical decision-making.
- › Create an environment where our teams can discuss issues in a professional and respectful manner, without bullying.
- › Never engage in or tolerate retaliation.
- › Never encourage or direct our teams to achieve business results at the expense of ethical conduct.
- › Promptly respond to reports of misconduct by contacting the Ethics Office and Human Resources as needed.



Each of us is responsible
for ensuring that all
individuals are treated
with respect and dignity.

To fulfill Cigna's mission, all persons must be treated fairly and equitably. Cigna is committed to promoting diversity, equity and inclusion in employment and values the varied perspectives a diverse workforce contributes to our success. Each of us is responsible for maintaining a positive and professional work environment and ensuring that all individuals are treated with respect and dignity.

RESPECT FOR OUR CUSTOMERS AND PATIENTS

We enroll and serve our clients, members, patients, and customers without regard to any classifications protected under applicable law (which includes race, color, religion, sex, national origin, age, disability, gender identity/orientation, gender expression, and status with regard to public assistance or genetic information).

HARASSMENT IS PROHIBITED

Cigna does not tolerate any form of harassment, including any type of verbal or physical behavior that is intimidating, threatening or demeaning (such as racist, sexist, or ethnic comments or jokes). Harassment is unacceptable, not only in our 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, instant messaging, and Internet access). Each of us must report any such behavior we observe to our manager or Human Resources. Please refer to the [Harassment Avoidance Policy](#) for additional information.

PROMOTE EQUAL EMPLOYMENT OPPORTUNITY

We base employment-related decisions on an individual's skills, qualifications, job performance, business need, and other lawful factors. We do not base any decisions on factors that are discriminatory or prohibited by law. In the United States, these include, but are not limited to, race, color, sex (including pregnancy), age, disability, veteran status, religion, national origin, ancestry, sexual orientation, gender identity, marital status, domestic partner status, genetic information, and citizenship status.

Please refer to Cigna's [Equal Employment Opportunity Policy](#) for the complete policy and important additional information.

COMMUNICATE OPENLY, RESPECTFULLY AND HONESTLY

We provide one another with accurate and timely information about business issues in a professional and courteous manner, always welcoming differing opinions and expressions of concern. While we recognize that healthy debate is important, our communications must never be hostile or threatening. Our open communication is an expression of our respect for each other.



PROMOTE A SAFE WORKPLACE

We must all be committed to creating and maintaining a safe and healthy work environment. Workforce members must remain alert and comply with [Health and Safety Policies and Procedures](#) and applicable laws and regulations. One element of a healthy, safe and productive workplace is its freedom from substance and alcohol abuse. Accordingly, workforce members may not, among other things, use, possess, manufacture, distribute, sell, or be under the influence of alcohol, marijuana, THC based products or illegal drugs while working at a Cigna facility or conducting Cigna business off-site. Please refer to [Cigna's Drug & Alcohol Policy](#) for the complete policy and important additional information.

RESPECT THE ENVIRONMENT

As a global health service Company, we make a connection between personal health and the health of our environment. Cigna's employees are expected to minimize their contributions to Cigna's energy, water and waste footprint whenever possible and comply with all applicable environmental regulations.

In support of our 100% Paper Shredding Initiative, employees should ensure that confidential documents are not accidentally discarded in the regular trash and that our paper waste is being recycled responsibly.

Cigna employees who are passionate about the environment and want to take steps in both their personal and professional lives to make a positive impact are also encouraged to participate in our GreenSTEPS (Sustainability Team for Environmental Protection and Stewardship) program.

MAKE POSITIVE CONTRIBUTIONS TO ADVANCE HEALTH AND WELL-BEING

Cigna Connects, our environmental, social, and governance (ESG) approach, aligns with our mission and role as an integrated health care company by making powerful connections that positively impact the health of people, communities, and the environment. Through Cigna Connects, we aim to serve as a catalyst of action and a convener of stakeholders who can together make a difference in matters of critical importance to the health care community.

Cigna's purpose fuels our success and enables us to broaden our impact as champions for affordable, predictable, and simple health care.

Cigna's employees have a desire to help others. We offer a wide range of giving and volunteering programs that align with Cigna's mission and enable you to direct your personal passion into service to benefit local communities, both on the job and off.



We create a better future together.

Maintaining a safe and respectful workplace is the cornerstone for coming together to create a better future.

We will always:

- › Treat all individuals with respect and dignity.
- › Maintain a positive work environment.
- › Maintain a zero tolerance policy for any form of bullying or harassment.
- › Support and promote diversity, equity and inclusion.
- › Communicate in a timely and courteous fashion.

Speaking up, asking questions,
and quickly reporting concerns
is part of everyone's job at Cigna.



**WE DO THE
RIGHT
THING**

KEEP PRIVATE INFORMATION PRIVATE

We must ensure that we carefully handle all confidential information regarding the Company's business, workforce members, customers, clients, and business partners.

Many workforce members routinely come into contact with the personal health information or personal financial information of patients or fellow Company workforce members. Our customers, workforce members, and clients expect us to diligently protect personal information.

Accordingly, our obligations necessitate that we safeguard confidential and personal information from unauthorized access – only providing information to authorized persons on a need-to-know basis – and also to use information responsibly and with integrity, in conformance with federal, state, and international laws. We are committed to maintaining trust by using or disclosing information as described in our privacy notices and policies. It goes hand in hand with who we are at Cigna.

For our Company, an example of a primary privacy law is the Health Insurance Portability and Accountability Act (HIPAA), which is designed to protect the privacy of “protected health information” (PHI). PHI includes information that identifies an individual, such as their name, Member and Plan IDs, and account numbers, as well as information about their physical or mental condition, or the provision of, or payment for health care.

In addition to HIPAA, there are state laws that establish data protection requirements. Outside the United States, many countries maintain and enforce their own privacy laws, which can be stricter or have a broader application than U.S. law. Protections for personal information or business data might differ by country, state or municipality. You must know and comply with all information protection and privacy policies and laws that apply to your role at Cigna.

Laws regarding personal information and PHI are complex and ever changing, reflecting evolving business and customer expectations. That's why speaking up, asking questions, and quickly reporting any concerns or potential data breaches are part of everyone's job at Cigna.



NEVER BRIBE NOR ACCEPT BRIBES

We do the right thing. Always. We never offer, solicit or accept bribes, or anything of value from any commercial business, government official or any intermediary, to obtain or retain business or gain an unfair business advantage.

Bribes also may not be paid indirectly through consultants or agents working on Cigna's behalf.

A "government official" can be anyone who is employed by a government entity or employed by an organization controlled by any government, including federal, state, local, county and municipal offices, governments and boards (e.g., a physician working for a government-run hospital or an employee of a public university or school district).

"Anything of value" is not limited to monetary payments but also includes anything useful or valuable to the recipient. Examples include:

- › Cash equivalents (i.e., gift cards, gift checks) or loans;
- › Gifts, meals, entertainment, transportation or travel;
- › Favors, including job offers or internships;
- › Sponsorships;
- › Donations to a charity affiliated with or sponsored by someone with whom we hope to do business or gain a competitive advantage; or
- › Political contributions.

We must avoid any conduct that creates even the appearance of improper interaction with a government official or commercial business. Indeed, we prohibit

the provision or reimbursement of business gifts, meals, and entertainment that improperly influence or create the appearance of improperly influencing employees, customers, suppliers or others doing business with Cigna.

Please review our [Anti-Corruption Compliance Policy](#), our [Business Gifts and Entertainment Policies](#), our [Small Supplier for Government Clients Policy](#), our [Lobbyist Retention Policy](#), and our [Lobbying Activities and Mandatory Disclosure Requirements Policy](#). You may also contact our Compliance or Legal Departments for assistance.

FACILITATION PAYMENTS ARE STRICTLY PROHIBITED

Facilitation payments, also known as "expediting payments" or "grease" payments, are small, unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement. In other words, it is a payment to a Government Official to get them to do something they should have done anyway. Examples of such routine governmental functions include issuing licenses or permits and installing telephone lines and other basic services. Where a government agency publicly posts price lists for expediting services that are available to the general public, these payments are permitted. For example, the U.S. Government has a fee schedule for standard passport processing and an increased cost for expedited processing. This increased payment is permissible because it is published, is available to anyone, and is not based on the discretion of any one government employee.



When working on a bid for a new client, is it appropriate to accept a recommendation to hire a specific consultant or agent at the request of the potential new client? **No.**

We will:

- › Never accept bribes.
- › Always consult with the Legal or Compliance Departments about a potential client's suggestion to engage a certain agent or consultant.

Cigna recognizes that its personnel may confront situations where payment is demanded to avoid physical harm. In these very limited circumstances, “Personal Safety Payments” may be made. Examples of such circumstances include:

- › Being stopped by persons claiming to be police, military, or paramilitary personnel who demand payment as a condition of passage of persons; and
- › Being threatened with imprisonment for a routine traffic, visa, or other similar minor violation, or for no reason at all, unless a payment is made.

Only under these or similar circumstances, and only where there is an imminent threat to the health or safety of Cigna Workforce Members, may a Personal Safety Payment be made without prior approval. Where a Personal Safety Payment has been made, it should be immediately reported to the International Compliance Officer. You must accurately reflect any such payments in the Company’s books and records.

KNOW THE RULES ABOUT GIFTS AND ENTERTAINMENT

We collaborate and work closely with our business partners. Building strong relationships can include giving and receiving gifts and providing entertainment. However, we must carefully follow all of our policies and procedures and never engage in any gift or entertainment activity with a business partner where it appears one of us is trying to gain an unfair business advantage, where our business judgment is compromised or where a conflict of interest could arise. In addition, meals, gifts or entertainment to or from a government official, union official, pharmaceutical manufacturer or any health care professional must be in strict accordance with our policies.

Pre-approval is required for an employee to speak or present at an event as a representative of Cigna, on behalf of Cigna, or where the remarks or content may be attributed to Cigna or make it appear that you are representing Cigna. Before you accept any such invitations and speak externally, you must contact your supervisor and the Ethics Office, and have your participation reviewed by Corporate Communications, consistent with [Cigna’s Communications and Social Media Policy](#). Pre-approval requests for external speaking engagements may be made through Cigna’s [Outside Activities Disclosure Form](#).

We use sound judgment before offering or accepting any gifts or entertainment – and we ask questions and report any concerns.

Consult our [Business Gifts and Entertainment Policies](#) for additional guidance on giving and accepting gifts and entertainment. If you have any questions or see or suspect improper conduct regarding gifts or entertainment, make a report immediately to the Compliance Department or contact the Ethics Help Line.



We partner, collaborate, and keep our promises.

Keeping our promises to each other and to our company includes partnering and collaborating fairly with all stakeholders.



When engaging in a gift or entertainment activity with a business partner, does it appear that one of us is trying to gain an unfair business advantage?

We:

- › Never seek or solicit gifts or entertainment from any business partners or competitors.
- › Never accept cash or cash equivalents (e.g., gift cards) and will report any such offer to our compliance officer.
- › Never accept any gift above Cigna gift limits from business partners or competitors.
- › Never offer any gifts or entertainment to, nor accept any from, health care professionals or pharmaceutical manufacturers that would be in violation of a company policy.
- › Never offer or accept gifts or entertainment to or from patients.
- › Accept only modest forms of entertainment that are reasonable and appropriate for the occasion where accompanied by a business partner.
- › Follow company guidelines before offering any gifts, meals and entertainment to government officials, including adherence to monetary limits and pre-approval requirements, and obtaining pre-approval for providing invitations to Cigna-hosted or Cigna-sponsored events.

MANAGE SUPPLIERS AND CONTRACTORS DILIGENTLY

We expect our suppliers and contractors to conduct activities on behalf of Cigna in a manner that is consistent with our Code and in accordance with their contracts with Cigna. Cigna's [Supplier Code of Ethics](#), which we include in our standard supplier contracts, sets forth several ethical principles, including compliance with all applicable laws, rules and regulations; avoidance of conflicts of interest; protecting customer, employee and client privacy; respecting human rights and labor; protecting the environment; and acting ethically and with integrity in business conduct. We work to make sure that suppliers and contractors live up to their obligations.

DON'T TRADE ON INSIDE INFORMATION

We may be exposed to material, nonpublic information about our Company and others. We never use any material, nonpublic information we have learned about any company to buy or sell the stock of that company. Doing so is known as "insider trading." "Material nonpublic information" or "inside information" includes any information that has not been made public that a reasonable investor would consider important in making a trading decision. Therefore, we must never buy, sell or trade Cigna securities – or the securities of other companies – until the Company releases that material information (for example, by means of a press release) and enough time has elapsed to permit the investment market to absorb and evaluate the information.

Common examples of inside information include financial information, new product or business growth plans, major contracts, business plans (including acquisitions and divestitures), major organizational changes, and major litigation, investigations or regulatory actions.

Handle inside information just as you would handle other confidential Cigna information.

- › Don't discuss it with family, friends or anyone else.
- › Don't talk about it in public places.
- › Don't email it to unverified email addresses.
- › Don't tell others at Cigna unless they must know for business reasons to perform their duties.

Please refer to the [Securities Transactions and Insider Trading Policy](#) for additional information.

MAINTAIN FIREWALLS BETWEEN COMPETING BUSINESS LINES

We are committed to maintaining the confidentiality of competitively sensitive information belonging to any third party with whom we have a business relationship (including our clients, vendors, and partners). To support this commitment, Cigna has established safeguards, or "firewalls," that dictate which company workforce members may access and use such competitively sensitive information. Please refer to the [Company's Firewall Policies](#) for additional information.

KEEP ACCURATE RECORDS

Regulators and our stakeholders expect Cigna to maintain robust controls over Company assets and accounting practices to ensure that books and records are transparent and accurate. Our commitment to integrity is reflected in our dedication to accurate record keeping and complete and timely reporting, including with respect to Cigna's financial condition and results of operations. 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 regulatory and business requirements, and Company policies. You are required to follow the appropriate retention period for Company records, as governed by the Company's records retention schedules, and, if applicable, any legal hold. If you know of or suspect a violation, you must report it promptly to your compliance officer. Please refer to the [Control, Accounting and Reporting and Records Management Policies](#) for additional information.

PREVENT MONEY LAUNDERING

As we focus on meeting the needs of our customers and business partners, we must also be aware of the signs of money laundering when dealing with these third parties. Money laundering occurs when a party attempts to hide the source of illicit income or assets through otherwise legal transactions to make that income or asset appear legitimate.

You should contact the Legal or Compliance Departments immediately when a third party:

- › Does not provide complete information or requested financial details.
- › Proposes an unusual transaction that does not seem to have a business purpose.

- › Changes the source or destination for payment for no clear reason.
- › Otherwise acts in a suspicious manner.

Please refer to Cigna's [Anti-Money Laundering and Counter Terrorist Financing Policy](#) for further details and a list of Red Flag Behaviors.

MAKE CORPORATE DONATIONS TO NONPROFITS THROUGH OUR CHARITABLE PROCESS

Cigna provides charitable donations, sponsorships, and contributions to nonprofit organizations whose work supports the health, well-being, and peace of mind of individuals and communities around the globe. All charitable contributions must be transparent and paid to nonprofit organizations whose charitable goals are compatible with Cigna's policies. Business area contributions to nonprofits must follow the Corporate

Charitable Contributions process. Please refer to Cigna's [Corporate Charitable Contributions Policy](#) for further details.

The Cigna Foundation is a separate entity that makes charitable grants primarily to health-related nonprofit projects. Requests for funding of any kind from the Cigna Foundation should follow the Foundation's application process.

PARTICIPATE IN THE POLITICAL PROCESS WITH CARE

Cigna encourages its workforce members, officers, and directors to participate in the political process as private citizens. However, when you make political contributions or engage in political activities, you must clearly distinguish any personal political views from those of the Company.

Any use of Cigna equipment, supplies, time, facilities, phones or administrative support in connection with any sort of political activity is strictly prohibited and could also be considered a "political contribution" in violation of the law and Cigna's policies. In some cases, even personal giving by workforce members or their immediate family may be prohibited. Please see our [Political Activity Policy](#) and our [Political Contribution Pre-Clearance Policy](#) for additional information. Where pre-clearance for a political contribution is required, the affected employee should complete [Cigna's Political Contribution Request Form](#).



Are you putting Cigna and yourself at risk by preparing invoices with false dates, even if it is at the request of your manager? **Yes.**

We will:

- › Only put complete and accurate information in all records.
- › Not compromise or violate the Code, our policies or the law, even if a manager asks us to do so.
- › Report any suspicions of false records, or requests to keep false records, to the Ethics Help Line, or to the Legal or Compliance Departments.

ADHERE TO FRAUD, WASTE AND ABUSE LAWS

Cigna complies with all applicable laws barring health care fraud, waste, and abuse. Federal and state health care anti-kickback laws prohibit patients, health care providers, and payers from making decisions based on illegal inducements rather than legitimate health-related reasons.

It is also against the law and our policies to submit false, fraudulent, or misleading information to any government agency or third-party payer to obtain payment for a service, or to gain or retain participation in a program.

Like anti-kickback laws, various other state and federal fraud, waste, and abuse laws are in place to promote safety and efficiency in our health care system. Please refer to the [False Claims Policy](#) for additional information.

FOLLOW OUR RULES FOR WORKING WITH GOVERNMENT AGENCIES

National, state, and local governments are significant customers for Cigna around the world. In the U.S. this includes the U.S. Department of Defense, and federal and state health care programs such as Medicare and Medicaid. Cigna and Cigna workforce members can be held liable for any false information that is provided to the U.S. government, so we take particular care to be accurate when submitting claims or records to these customers. We promptly report any suspected misconduct, fraud or abuse.

When a government is our customer, we may have additional contractual requirements that include, for example, rules prohibiting any requests for 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. Please refer to the [Anti-Kickback Policy](#) for additional information.

Cigna also has subsidiary companies that operate health and prescription drug benefit plans in the U.S. Medicare Part D and Medicare Advantage programs, as well as clients that operate their own Medicare Part D, Medicare Advantage and Managed Medicaid plans, or offer such plans to their workforce members. In addition, certain Cigna subsidiaries function as health care providers through mail order and specialty pharmacies that bill Medicare and state Medicaid agencies directly.

If your role is related to government programs business, you must be familiar with current program requirements and carefully follow all applicable laws and regulations. This includes fraud and abuse laws, as well as any other applicable national, state, and local laws (e.g., pharmacy practice laws).

Laws and regulations regarding U.S. government health care programs such as Medicare and Medicaid can be complex and change frequently, so Cigna has processes in place to prevent, detect, and promptly correct instances of fraud, waste or abuse. If you have questions about legal requirements for these programs, contact the Compliance or Legal Departments.

As a contractor for the U.S. Department of Defense, we must comply with the terms of our contracts and with all regulatory and statutory requirements that apply. If you work on the U.S. Department of Defense program, you're responsible for knowing and complying with those requirements, including the U.S. government's zero tolerance policy on human trafficking, during the performance of government contracts and related subcontracts. Complying with these mandates may require additional actions from you, such as time tracking, that would not be required for work with other clients. If you have questions about the program requirements, contact the Compliance Department.



COOPERATE WITH GOVERNMENT AUDITS OR INVESTIGATIONS

We fully cooperate with any government audits or investigations as required by law. As Cigna workforce members, we also cooperate fully with the Company's Legal, Human Resources and Compliance personnel, who may be responding to or facilitating a government audit or investigation. You should promptly notify the Compliance Department or the Legal Department about any request for information or any unscheduled government inspection or investigation. Workforce members are not required to provide any such notice or cooperate with Cigna lawyers in any investigations involving the U.S. National Labor Relations Board or any matter concerning its terms or conditions of employment.

CONTACT GOVERNMENT OFFICIALS RESPONSIBLY

When we communicate with government officials or regulators, we provide complete, factual and accurate information. We are allowed contact with government officials or regulators when our work for Cigna requires it. All other contact with government officials or workforce members – 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 United States 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 United States.

If you're asked to complete a survey or questionnaire administered by, or participate in a study conducted by, a government agency or program, such as an insurance regulator, a health agency, the U.S. Office of Inspector General, the U.S. Centers for Medicare & Medicaid Services, or a U.S. state Medicaid program, you must obtain pre-approval from the Compliance Department.

Complex rules govern the recruitment and employment of former or current government officials and employees. Before approaching or considering current or former government officials and employees for employment, or for a consulting or contracting role, seek guidance from Human Resources and the Legal Department.



DISCLOSE EXCLUSION OR CRIMINAL BEHAVIOR

Acting ethically, maintaining high standards of integrity and respecting the law are fundamental to our identity as a Company. If you have been excluded from participation in a U.S. federal health care program, you must notify your manager or Human Resources within three days. You must also immediately report to your manager if your name appears in the exclusions databases of the U.S. General Services Administration or the Office of Inspector General at the Department of Health and Human Services.

Further, if you have been found guilty or pled guilty or no contest to a criminal violation, you must notify your manager or Human Resources immediately within three days. In addition, if you are arrested for an alcohol or drug-related offense in the workplace or while conducting Cigna business, you must notify your manager within five days of the arrest. Disclosure is not required if the criminal records have been expunged or are sealed juvenile offenses.

DISCLOSE LICENSURE OR CERTIFICATION DISCIPLINE

Certain employees are required to obtain and keep current a license or certification in the jurisdictions in which they work, such as a license to practice law, a pharmacist or insurance agent's license or registration, or a doctor's or nurse's license. It is your responsibility to obtain and maintain these requirements to continue performing your job. If you are disciplined, censured, suspended or disbarred from any licensed profession, you must notify your supervisor or Human Resources immediately.



When communicating with a regulator regarding an audit, is it responsible to engage in a conversation about seeking new business, when the regulator mentions his agency is bidding for a new provider? **No.**

We will:

- › Always follow our policy with regard to contact with government officials and regulators.
- › Not seek new business from a government agency unless authorized to do so.
- › Contact the Legal Department, the Compliance Department or the Ethics Help Line to report any concerns pertaining to communicating with government officials.



We work as a team and collaborate to put the best interests of Cigna first.

PROTECT CIGNA'S ASSETS

Cigna property, including our real estate, equipment, and supplies, must be protected from misuse, damage, theft or other improper handling. This property is meant to be used for Cigna business. We use Cigna funds responsibly and solely for Cigna business purposes. Reimbursement is permitted only for actual, reasonable, and authorized business expenses.

Cigna property also includes computers, networking resources, email systems, voice systems, and other computer-processed information. We also protect these systems and the information on them from improper access, damage or theft. Subject to local laws, Cigna may review email and other electronic information to determine their compliance with our Code, our values, our policies, and the law.

We also protect Cigna intellectual property (IP), which can include innovations, business methodologies, unique products, patents, trademarks, copyrights, and trade secrets. The Company owns all IP developed on Cigna time or using Cigna resources. If you terminate employment with Cigna, the obligation of confidentiality continues.

We respect the IP of other entities and neither use the IP of former employers in our role at Cigna nor share this information with anyone. We do not improperly copy, download, access or use others' work, including photos, images, articles, documents, computer programs (including code), movies or music, in violation of applicable laws or any licensing or other agreement. Please refer to the [Intellectual Property Policy](#) for additional information.

Contact the Legal Department if you have questions about using material located online or that may appear to be owned by a third party.



Is it proper handling of Cigna's assets to use the office printer to print invitations for the family event you are coordinating? **No.**

We will:

- › Only use our assets, including our electronic assets such as printers, responsibly and only for legitimate Cigna business.

AVOID CONFLICTS OF INTEREST

A conflict of interest arises when your personal activities or interests influence, or appear to influence, your ability to act in the best interests of Cigna. They may also arise when you or a member of your family receives personal benefits as a result of your role with Cigna. We work as a team and collaborate to put the best interests of Cigna first. We avoid actual or perceived conflicts of interest and never let our personal business dealings improperly influence – or even appear to improperly influence – our duty to Cigna. Please refer to Cigna’s [Conflict of Interest Policies](#) for additional information. Disclosures of potential conflicts or proposed outside activities may be made through Cigna’s [Conflict of Interest and Outside Activities Disclosure Form](#), for review by the Ethics Office.

Conflicts of interest can include, but are not limited to, the following.

Corporate opportunities: You must not take or direct anyone else to take a business opportunity that you discover through your role at Cigna. We never use our position or Cigna’s assets or information for any type of 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:

To avoid even the appearance of a possible conflict, you must not work for another company, or act as a partner or board member of another company or nonprofit health care company, under circumstances that might conflict with your role at Cigna. You must not own a company that does business with Cigna; or serve as a public official or run for elected office in conflict with your duties at Cigna. Consult with your manager and the Ethics Office before undertaking any employment or outside activities that could call into question your ability to act in Cigna’s best interests.

External clinical practice: Cigna clinicians who wish to engage in clinical practice or other paid or unpaid clinical work or activities outside Cigna, or who have an ownership interest in a health care – related business that may provide covered services to Cigna customers, must take care to avoid conflicts of interest as well. Please refer to the [Clinician Conflict of Interest Related to External Activities Policy](#).



Can accepting a personal contract project from a longtime Cigna vendor be perceived as a potential conflict of interest? **Yes.**

We will:

- › Avoid actual or perceived conflicts of interest.
- › Consult with a manager and/or the Ethics Office before undertaking any employment activity that could conflict with the ability to act in Cigna’s best interests.

Family relationships: Your immediate family members, significant others and individuals in your household must never improperly influence, or appear to influence, your Cigna-related business decisions, or lead to you supervising or being supervised by a close family member or significant personal partner. You must report family relationships to your manager and the Ethics Office whenever that relationship creates an actual or apparent conflict of interest, and where such reporting is allowed by applicable law.

COMMUNICATE ACCURATELY AND FAIRLY

We encourage positive and transparent communication to promote our business and manage relationships.

We can never misstate facts about our business or conceal information necessary to fairly operate our business.

Disclosure of material, nonpublic information may be made only by individuals authorized to speak on behalf of Cigna. You may not communicate with the investment community on behalf of Cigna without advance approval from Investor Relations.

You may otherwise speak on behalf of Cigna only if you have prior authorization and approval from Corporate or International Communications, and you must adhere to approved scripting. Otherwise you must direct all media inquiries to Corporate Communications. In addition, you must never give the impression that you are speaking on behalf of Cigna in any personal communications.

We encourage you to use communication platforms, including social media, as a way to share Cigna content, demonstrate our commitment to working together in the communities we serve and connecting with customers or prospective customers. Such communications, however, must be made in compliance with our [Communications and Social Media Policy](#).

We act with speed and purpose.

We represent the Cigna name and brand in everything we do and say. Our quest for speed is balanced with a strong sense of purpose and commitment to doing things the right way.

If you are involved with government contracting, you must not accept solicitation information about a state or federal procurement from any source other than the procuring agency, such as a consultant or contractor, for example. The attorney in the Legal Department responsible for government contracts must be involved in all government contracting initiatives.

WAIVERS TO OUR CODE

Our Code cannot be waived except when the Chief Compliance Officer or designee reviews a written waiver request and explicitly allows a waiver of a portion of the Code. Cigna's Board of Directors or an appropriate committee of the Board must authorize any waivers for executive officers and directors. Waivers will be promptly disclosed when required by applicable law.



How does my communication reflect on Cigna – and myself? Does it show that we care about our customers, patients and coworkers?

When communicating we will:

- › Only speak for Cigna if we are specifically authorized to do so.
- › Take caution when making public statements such as social media posts.
- › Direct all media inquiries to Corporate Communications.



Cigna looks for competitive advantages through legal and ethical business practices.

LOCAL LAWS

As a global Company, we are subject to the laws of many countries and jurisdictions around the world. If a provision of our Code is more stringent than, and is consistent with, applicable law, you must adhere to the more stringent provision under the Code. If the local law is more stringent, we follow the law. Consult with your compliance officer or local Legal Department about the laws that apply to you.

Our quest for innovation and adaptation is balanced with respect for fair business practices and competition.



We innovate and adapt.

We will:

- › Follow all applicable laws.
- › Neither accept nor tolerate taking advantage of anyone through manipulation or the misrepresentation of information.
- › Seek help if we have questions about what laws may apply.

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, providers and suppliers; paying claims; answering customer inquiries or complaints – in a fair manner. We neither accept nor tolerate taking advantage of anyone through, for example, manipulating or misrepresenting information.

Cigna competes fairly around the world. As we seek to maintain and grow our business through superior products and services – and not through any improper or anticompetitive business practices – we comply with competition and antitrust laws throughout the world. Please refer to our [Antitrust and Fair Competition Policy](#) for additional information. These laws are very complex, so if you are unsure about appropriate business practices, consult with your compliance officer or local legal counsel.

HONOR ECONOMIC SANCTIONS AND TRADE RESTRICTIONS

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

We are also prohibited from participating in any boycott of a particular country unless permitted by the U.S. government. If you are asked to participate in or provide information about supporting a boycott, report this to your compliance officer before taking any action. Please refer to the [Antiboycott Policy](#) and the [Economic Sanctions Policy](#) for additional information.

When working to attract a new client, is it fair business practice to discuss a rumor pertaining to a competitor's troubled finances? **No.**

We will:

- › Compete to win, but always compete fairly.
- › Not say disparaging things about our competitors nor attempt to secure or reveal any confidential information that may belong to them.
- › Always comply with competition and antitrust laws throughout the world.

