

# CIGNA SUPPLIER CODE OF ETHICS

As a global health service company with the mission of helping improve the health, well-being and sense of security of the people 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 providing services that meet our clients', customers', employees' and business partners' needs. In addition, we pride ourselves on our commitment to act ethically, compliantly and with integrity. 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.

## 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

## 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

## INTEGRITY IN THE ENVIRONMENT



- ✓ Comply with all applicable environmental laws
- ✓ Attempt to minimize and reduce waste, reduce carbon footprints and conserve water

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.

Together, all the way.®



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 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**

Supplier 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' right to a living wage, whereby compensation is enough to meet basic needs, provides some discretionary income and no deductions from wages are made, 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, and 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.

### **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 that 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 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 must immediately notify Cigna of any potential data or privacy breach, unless otherwise stated in an executed agreement with Cigna.

### **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.

### **Anti-corruption**

Suppliers must not pay or offer anything to any government official, employee of a state-owned enterprise or political candidate for office for improperly influencing such person, or obtaining or retaining business. Cigna expects all Suppliers to comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act 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 United States Government, or with Suppliers that are on any list of sanctioned persons or entities as designated by the United States Government. Suppliers should also not participate in any boycott of a country unless sanctioned by the United States Government.

### **Submit 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 has been committed. Suppliers must abide by any legal requirements pertaining to government contracting.

## **Integrity in the environment**

### **Environmental compliance**

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

### **Environmental footprints**

Cigna expects Suppliers to take action to identify and implement efforts designed to minimize/reduce their carbon, waste and water footprints. Cigna reserves the right to request environmental footprint reporting from any Supplier.

## **Who to contact**

No code can possibly answer every question or anticipate every situation. A Supplier may ask questions or report any concerns regarding compliance with this Code, or other standards pertaining to Suppliers' provision of services, to Cigna by contacting your Cigna relationship manager or the Cigna Ethics Help Line, 24 hours a day, seven days a week, in the U.S. at 1.800.472.8348 or outside the U.S., at 800.472.8348 toll-free by using these **access codes**. Suppliers may also access the Help Line via the web at **[www.cigna.ethicspoint.com](http://www.cigna.ethicspoint.com)**, or via email at **[Ethics@Cigna.com](mailto:Ethics@Cigna.com)**. Suppliers can report anonymously on the Cigna Ethics Help Line.

