

Anti-Corruption Compliance Policy



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Section I: Scope

This Policy applies to all of The Cigna Group business dealings and transactions in all countries in which it or its controlled subsidiaries conduct any business. The Cigna Group can be held liable for failing to prevent Bribery by Workforce Members or Associated Persons working on the Company's behalf regardless of where the act takes place. Compliance with this Policy is therefore mandatory for The Cigna Group entities, controlled subsidiaries, Workforce Members, business units, and agents.

Moreover, The Cigna Group expects its business partners and Associated Persons to conduct themselves in an ethical manner and consistent with the standards set forth herein.

Where local legal and regulatory requirements exceed the requirements of this Policy, the more restrictive local requirements must be applied.

Section II: Definitions

Term	Definition
Anything of Value	<p>“Anything of Value” is not limited to monetary payments, but also includes anything useful or valuable to the recipient.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Cash, cash equivalent (i.e. gift cards, gift checks) or loans; • Payments for gifts, meals, entertainment, transportation and travel; • Favors, including offering of employment or internship; • Sponsorships; • Charitable contributions; and • Political contributions.
Associated Person	<p>An “Associated Person” is an individual or entity who performs services for or on behalf of The Cigna Group. The capacity in which such services are performed does not matter.</p> <p>For example, an Associated Person may be one of Workforce Members, intermediaries such as brokers, agents, consultants, introducers, third party representatives, suppliers and vendors.</p>
Bribery	<p>The offering, promising, giving, accepting, or soliciting, whether directly or indirectly, of an advantage or Anything of Value, as an inducement for an action which is illegal, unethical or a breach of trust. “Bribery” includes illegal upfront payments and Kickbacks and may include payments intending to obtain or retain business for the organization or to obtain or retain regulatory advantage.</p>
The Cigna Group or Company	<p>“The Cigna Group” or “Company” means The Cigna Group and its wholly owned or controlled subsidiaries and market segments, including Cigna Healthcare and Evernorth Health Services.</p>
Corruption	<p>Dishonest or criminal activity undertaken by a person or organization entrusted with a position of authority, often acquiring illicit benefit.</p>

Definitions

Term	Definition
Government Official	Includes but is not limited to employees or officials in any legislative, judicial or executive branch of government; employees of regulatory bodies; employees or officials of International Organizations; and employees of partially or wholly government-owned institutions, such as hospitals and clinics, universities, public utilities, partially or wholly owned corporations, schools, convention centers and stadiums. "Government Official" includes Politically Exposed Persons (PEPs), as well as any persons acting in an official capacity, including any political candidate, official or representative of a political party.
International Organization	An "International Organization" refers to a formal association of sovereign states or other entities that come together for the purpose of addressing common issues, promoting cooperation and pursuing shared objectives on global or regional scale. It includes (a) non-governmental organizations (NGOs) such as The Salvation Army, International Rescue Committee; and (b) intergovernmental organizations, also known as international governmental organizations (IGOs) such as United Nations, World Trade Organization (WTO) that have a membership made up primarily of sovereign states.
Kickback	<p>A "Kickback" is a form of negotiated Bribery in which a commission is paid to the bribe-taker in exchange for services rendered. Generally speaking, money, goods, or services handed over are negotiated ahead of time. The purpose of the Kickback is usually to encourage the other party to cooperate in the illegal scheme.</p> <p>Traditional bribes are provided up front (before the unethical activity) whereas "Kickbacks" usually refers to something that is given in return as a reward (after the unethical activity).</p>
Personal Safety Payment	A payment made by an individual who reasonably believes that his or her health or safety would be threatened without the payment. Personal Safety Payments are permitted under this Policy and have reporting requirements if such payment is made.

Definitions

Term	Definition
Politically Exposed Person (“PEP”)	<p>A “PEP” is someone who, through their prominent position or influence, is more susceptible to being involved in Bribery or Corruption. PEPs include:</p> <ul style="list-style-type: none"> • Government Officials in legislative, judicial and executive roles; • Political candidates and members of the governing bodies of political parties; • Persons in diplomatic roles and members of state-owned enterprises; • Members of central financial institutions; • High-ranking officers in the armed forces; • Members of the administrative, management or supervisory bodies of state-owned enterprises; • Directors, deputy directors and members of the board or equivalent function of an International Organization; and • Close associates of a PEP or family members of a PEP, including members of royal families.
Workforce Members	<p>For the purpose of this policy, “Workforce Members” includes all employees, officers and other agents, such as contract or temporary workers, of the Company.</p>

Section III: Purpose

Corruption can take many forms, but most often it occurs through Bribery. At The Cigna Group, we do not tolerate any form of Corruption in connection with our business dealings both because the Company is committed to the highest level of integrity and because legal requirements across the world prohibit Bribery of Government Officials. Moreover, certain countries also criminalize the Bribery of private/commercial business people. This Policy outlines prohibited conduct and details books and records accounting requirements that are necessary to comply with the law and maintain the Company's mission of integrity and transparency.

The consequences of Workforce Members or Associated Persons committing Bribery or participating in other corrupt acts are significant, including reputational harm, criminal and civil penalties and large fines. Accordingly, Workforce Members must strictly adhere to this Policy.

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



Section IV: Overview

The Cigna Group is committed to conducting business ethically¹ and prohibits Bribery of Government Officials or private persons/entities in connection with the conduct of its business throughout the world. Bribery of Government Officials is illegal under the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act and the laws of many other countries (collectively, the “Anti-Corruption Laws”). Violation of these laws subject the Company and its Workforce Members to potential criminal and civil liability, as well as reputational harm.



The Cigna Group prohibits Bribery of Government Officials, as well as commercial or business to business Bribery.

1. For more information regarding the Company's guiding principles and ethical business practices, please refer to The Cigna Group [Code of Ethics and Principles of Conduct](#).

A. Prohibition of Bribery

Bribery in any form or any size is illegal. It is prohibited under this Policy to offer, promise, give, request, agree to receive or accept bribes. You are not permitted to use your own funds to make any payments prohibited by this Policy.

1. Bribery of Government Officials

The Cigna Group prohibits all Workforce Members and representatives from giving, promising, offering, or authorizing, any financial payments or **Anything of Value** to any Government Official for the purpose of improperly influencing a Government Official's action or securing an improper advantage in order to obtain or retain business, or obtain a regulatory advantage.

The phrase “obtain or retain business” includes improper payments to secure, perform, or maintain government contracts, as well as improper payments to secure discretionary governmental action in the normal course of business operations.

Examples include improper payments to: secure business permits; reduce tax or duty liabilities; or limit other financial liabilities or fees.

Under this standard, all payments to Government Officials that may **directly or indirectly** give the Company an improper business advantage are prohibited. Examples of “indirect actions” include authorizing third-parties to extend bribes.

Workforce Members and representatives should avoid any conduct that creates **even the appearance** of improper interaction with a Government Official.



What's “Anything of Value”?

It's a broad term. Enforcement authorities have prosecuted companies for Bribery disguised as hiring the relatives of a Government Official, paying for trips with little business value, paying for spouses to attend events, consulting fees with no deliverables, and creating sham consulting positions for the friends and family of Government Officials.

2. Commercial or “Business to Business” Bribery

In addition to prohibition of Bribery of Government Officials, The Cigna Group also prohibits “business to business” Bribery, which is the offering, promising or giving of and requesting, agreement to receive or accept corrupt payments and/or other benefits, including business courtesies between private (non-government) persons or entities for a corrupt or improper purpose. This can be done by granting, or agreeing to grant, a benefit to another party without the knowledge of that party’s employer or principal.

A corporate or commercial organization commits an offense where an Associated Person bribes another person, intending to obtain or retain business for the organization or to obtain or retain an advantage in the conduct of business for the organization.



Ask yourself

If I offer a broker seasonal tickets to a major sporting event, but only if they agree to bring their business to The Cigna Group, is this offer considered a bribe?

Answer: Yes. This offer is an illegal bribe as it is used to gain a commercial and contractual advantage. This offer exposes you, The Cigna Group and the broker (if the broker accepts the bribe) to criminal charges. Even if the broker turns down the offer, the offering of the bribe is a criminal offense.

3. Facilitation Payments

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, the payment is made 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, available to anyone, and is not based on the discretion of any one government employee.



Ask yourself

I was told that the Company had to pay a small, cash fee in order for our work permits to be processed. I cannot find this fee on the government website or list of fees from the authority. Is this permitted?

Answer: No. This is a request for a small bribe or facilitation payment, which is prohibited by the Company. No legitimate payments should be requested in cash. If you receive such a request, please contact [your business unit compliance officer](#) immediately.

4. Personal Safety Payments

The Cigna Group 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 or visa violation 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 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](#) and such payments must be accurately reflected in the Company’s books and records.

B. Books and records requirements

The FCPA also creates criminal liability for companies that fail to maintain accurate books and records, even for activities not related to Bribery and that are entirely domestic.

The FCPA accounting provisions require The Cigna Group and its subsidiaries to:

1. Make and keep books, records, and accounts that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the Company’s assets. Remember:
 - Any unrecorded payment or inaccurate record could lead to an enforcement action, regardless of whether the underlying transaction is improper.
 - All documentation regarding expenditures, including general ledger and journal entries, original invoices and receipts, and expense reports, must be accurate and complete.
 - At a minimum, the Company’s books and records must reflect the recipient and/or beneficiary, amount, nature, purpose, and date of each expenditure.



Ask yourself

I recently paid for a business dinner that I hosted. It was for three Government Officials who work for a state-owned bank that sells insurance. During dinner we discussed the possibility of the bank offering or promoting the Company's products to their customers. I received pre-approval from my business unit compliance officer and stayed under the meal limits. Is it okay to describe the meal as “promotional expenses” when I seek reimbursement?

Answer: No. Our books and records must accurately reflect how money is spent. Even though pre-approval was received and you stayed within limits, the Company can still be penalized by government agencies if books and records are not transparent and accurate. You must record, at minimum, the recipient and, or beneficiary, amount, nature, purpose, and date of each expenditure.

2. Devise and maintain a system of internal accounting controls sufficient to provide reasonable assurances that:
 - Transactions have management authorization;
 - Transactions are recorded properly to permit preparation of financial statements and to maintain accountability for assets; and
 - The Company has policies and procedures regarding pre-approval and dollar limits for gifts, entertainment, meals and travel that are strictly enforced.

Important elements to consider:

- **No materiality requirement.** The FCPA accounting provisions apply to all transactions. Even low dollar transactions can create FCPA liability.
- **Inaccurate books and records are not only about falsified records.** In addition to falsified records, off-the-book payments or records that

fail to show the real purpose or nature of a transaction also violate the FCPA. For example, entertainment for Government Officials should be specifically recorded and not buried in the cost of the product.

- **Bribes can be mischaracterized as:** commissions, consulting fees, sales and marketing expenses, travel and entertainment, miscellaneous expenses and petty cash withdrawals.
- **No records shall ever be kept “off-book”** to facilitate or conceal improper payments.
- **Commercial Bribery may create criminal liability.** Engaging in commercial Bribery can result in criminal liability in multiple jurisdictions. Furthermore, while the FCPA Bribery provisions apply exclusively to Government Officials, the books and records provisions encompass all transactions conducted by a company.



Ask yourself

The CEO of a very large prospective client said they would award The Cigna Group the business if the Company could find a consultant position for a family member. Can I forward that family member's resume to HR and encourage them to hire the individual?

Answer: No. This is a bribe that is prohibited by the Company's policy. Even if the CEO's family member is qualified to act as a consultant, the CEO's request, and making the Company's contract contingent on the request, is improper.

C. Gifts, meals, entertainment, travel, hiring practices, and charitable and political contributions

Gifts, meals, entertainment, travel, hiring practices, and charitable and political contributions all present some corruption risk. You are urged to consult the applicable global and local policies governing these types of payments or requests, to ask questions, consult the Compliance tools provided, perform due

diligence and consult with [your business unit compliance officer](#) or the [International Compliance Officer](#). Please see **Appendix A** for a list of relevant global and local policies regarding gifts, meals, entertainment, travel, hiring practices, and charitable and political contributions.



Ask yourself

Several non-U.S. Government Officials requested that the Company arrange, at the Company's cost, a trip to The Cigna Group headquarters in the U.S. to meet with the management and tour the Company's Customer Service Center. The officials also suggested that they would like to visit other places in U.S. as well. Can the Company arrange this trip for them?

Answer: Part of the trip is permitted. The Company may pay for reasonable (not lavish) promotional or marketing expenses made in good faith, that are directly related to performing an existing contract or promoting, demonstrating or explaining its products and services. A trip to visit the customer service center would be permitted, however stopovers in different parts of the U.S. are not directly related to the promotion of the Company's business, and therefore may not be paid for by the Company.

Gifts, meals, entertainment, travel, charitable donations or other relevant expenses must meet certain criteria:

1. **Be within the prescribed monetary limits:**
As permitted by our policies.
2. **Be bona fide:** Made for the right reason, if a gift or hospitality, it should be given clearly as an act of appreciation; if travel expenses then for a bona fide business purpose (reasonable [not lavish] accommodations and for a true work purpose, not a vacation in disguise).
3. **Have no obligation:** The activity will not create any obligation or expectation on the recipient.
4. **Exert no undue influence:** The expenditure will not be seen as intended for, or capable of, achieving undue influence in relation to a business transaction or public policy engagement.
5. **Be made openly:** It will not be performed in secret or be undocumented; if it is, then the purpose becomes questionable.
6. **Be legal:** It is compliant with relevant laws.
7. **Accord with stakeholder perception:** The activity would not be viewed unfavorably by stakeholders were it made known to them.
8. **Be proportionate:** The value and nature of the expenditure is not disproportionate to the occasion.
9. **Conform to the rules of the recipient organization:** The gift, hospitality or reimbursement of expenses will meet the rules or code of the recipient's organization.
10. **Be infrequent:** The giving or receiving of gifts and hospitality is not overly frequent between the giver and the recipient.
11. **Be clearly documented:** Workforce Members must keep accurate books and records that reflect gifts, meals, entertainment, travel, charitable donations or other relevant expenses given in accordance with the legal and regulatory requirements applicable to the business unit and consistent with The Cigna Group policies. At a minimum, books and records must reflect the recipient and/or beneficiary, amount, nature, purpose and date of each expenditure.

When analyzing the above criteria, Workforce Members should consider whether there is a current or potential regulatory audit, permit, sales pitch, tender or bid process, or active opportunity with the recipient.



Ask yourself

If I saw a headline about a gift I am planning to give to a business partner, would I be concerned or embarrassed, even if it fell within guidelines of The Cigna Group?

Answer: If yes, then you should not give the gift or entertainment. The policy of The Cigna Group is designed to prevent even the appearance of inappropriate behavior.



In recent years, a vast majority of FCPA-related enforcement actions involved third party intermediaries. Risk-based pre-engagement due diligence and continuous monitoring is critical to preventing Bribery and Corruption relating to third parties.

D. Third Parties

The Cigna Group may be held liable in certain circumstances for the conduct of third parties acting on its behalf, including, without limitation, business partners, agents, consultants, and intermediaries, regardless of whether the third party itself is subject to the Anti-Corruption Laws. As a result, all third parties engaged by the Company must comply with the applicable Anti-Corruption Laws.

If you deal with third parties, you are responsible for taking reasonable precautions to ensure that the third party conducts business ethically and complies with this Policy. Such precautions include (1) conducting a risk-based pre-engagement integrity review consistent with relevant Company policies and processes; (2) written anti-corruption compliance provisions in applicable contracts with third parties; (3) and monitoring ongoing compliance and legitimacy of the services provided by, and the compensation paid to, the third party during the engagement. In addition, you are obligated to report to [your business unit compliance officer](#) or the [International Compliance Officer](#) any information indicating that a third party may have violated this Policy or applicable Anti-Corruption Laws.

Ask yourself

Companies that want to distance themselves from Bribery and Corruption often use third parties to funnel a bribe. These third parties may be paid through sham marketing and consulting contracts. In these situations, excessive commissions are paid to the third party, which secretly passes some portion of the funds to the Bribery target.

Ask yourself, is a consultant fee a bribe in disguise?

- Does the fee seem much higher than the fees of similar consultants previously used?
- Is there a list of concrete deliverables from the consultant?
- Does the consultant provide a breakdown of results that justify payment?

Be aware of red flags. Bribes can be hidden in seemingly legitimate payments, including vague consulting agreements and fees that are unusually high. You should discuss red flags with your manager or [business unit compliance officer](#).

Section V: Ensuring Compliance

Because The Cigna Group is committed to doing business ethically and in compliance with applicable Anti-Corruption Laws and this Policy, The Cigna Group anti-corruption compliance program will be evaluated periodically and revised to account

for changes in the Anti-Corruption Laws and to accommodate good compliance practices. You are expected to know and understand your obligations under the Anti-Corruption Laws and this Policy at all times.





Section VI: Training

The Cigna Group and its subsidiaries must provide Anti-Bribery and Corruption training to targeted employees to enhance awareness and to ensure compliance with the applicable laws and regulations in each of the operating jurisdictions of The Cigna Group, as well as with the Company's own policies and procedures.

The training provided must be effective and proportionate to the risks identified by the business, such as frequency of interactions with Government Officials, and tailored to the respective roles and responsibilities of each employee targeted for training. The Cigna Group must take steps to assess the effectiveness of the training provided by testing the knowledge and competency of its employees.

Workforce Members working in specialist business areas or with roles which carry specific Anti-Bribery and Corruption accountabilities must complete enhanced training on a regular basis.

All Workforce Members who are assigned with Anti-Bribery and Corruption training are required to complete such training that is appropriate to their role, operating environment and jurisdictions.

All new employees, including contractors and temporary employees who are assigned with Anti-Bribery and Corruption training must complete such training within 60 days of starting the role, and on a regular basis.

Section VII: Monitoring

The Cigna Group must complete regular assessments of the adequacy and effectiveness of procedures, systems and controls to manage its Bribery and Corruption risk in line with this Policy.

Internal Audit is responsible for undertaking independent testing of Anti-Bribery and Corruption systems and controls of The Cigna Group.

Section VIII: Who to contact with questions or reporting concerns

A. Duty to Report – You have an affirmative duty to report any request for an improper payment received by a Government Official and actual or potential violations of this Policy or the Anti-Corruption Laws, whether by Workforce Members or third parties, to your manager, [business unit compliance officer](#), [International Compliance Officer](#), or the [Ethics Help Line](#).

B. Who to Contact with Questions

Questions regarding the requirements of this Policy and your obligations should be directed to your [business unit compliance officer](#) or the [International Compliance Officer](#).



Appendix A

Relevant policies related to anti-bribery and corruption

Title	Owner
Cigna Code of Ethics and Principles of Conduct	Ethics Office
Anti-Kickback and Arrangements Review Policy	Ethics Office
Travel and Entertainment Policy	Travel Planning/Human Resources
Business Gifts and Entertainment Policy	Enterprise Compliance
Business Gifts, Meals and Entertainment for U.S. Public Officials	Legal & Government Affairs
International Health Business Gifts, Meals and Entertainment to Government Officials Policy	International Compliance
International Health Business Gifts, Meals and Entertainment to Third Parties	International Compliance
Charitable Contributions Policy	Ethics Office, International Compliance and Community Programs
International Markets Charitable Contributions Request Form and Due Diligence Questionnaire	Civic Affairs
Political Activity Policy	Ethics Office and Government Affairs
Hiring Practice Guideline for Anti-Corruption Compliance: International	International Compliance Officer, VP Human Resources Officer and Business Unit Human Resource Recruiters
Control, Accounting and Reporting Policy	Finance

Before You Act **Ask Yourself**



This Policy applies to all US and International Health Workforce Members and to all business dealings and transactions of The Cigna Group. Where local legal and regulatory requirements exceed this Policy's requirements, the more restrictive local requirements must be applied. The Cigna Group expects Associated Persons, and its Business Partners to conduct themselves consistent with the principles set forth herein.

All The Cigna Group products and services are provided exclusively by or through operating subsidiaries of The Cigna Group, including Cigna Health and Life Insurance Company, Connecticut General Life Insurance Company, Evernorth Behavioral Health, Inc., and HMO or service company subsidiaries of Cigna Health Corporation. All company names, logos and marks, including The Cigna Group and Cigna Healthcare, are owned by Cigna Intellectual Property, Inc.

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