

# Anti-Human Trafficking Policy





## I. Purpose

The Cigna Group is committed to a work environment free from Human Trafficking. The Cigna Group prohibits and does not condone Human Trafficking in any part of our global organization. This Anti-Human Trafficking Policy (“Policy”) identifies the practices in which The Cigna Group Workforce Members, as defined below, must not engage.

## II. Scope

This Policy applies to all Workforce Members. Where local country laws contain mandatory requirements that differ from the provisions of this Policy, those requirements will govern for individuals working in those countries. Where local laws are less stringent than our policy, our policy takes precedent. Please refer to your local legal department or compliance officer if you have questions about your local laws or policies.



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



## III. Definitions

### **The Cigna Group or Company**

“The Cigna Group” or “Company” means The Cigna Group and its wholly owned or controlled subsidiaries.

### **Human Trafficking**

“Human Trafficking” means the use of force, fraud, or coercion to obtain some type of labor, including unlawful child labor, or commercial sex acts.

### **Workforce**

For the purpose of this policy, “Workforce” or “Company Workforce” includes all employees, officers, and other agents, such as contract or temporary workers, of the Company.

### **Supplier**

“Supplier” means third-party entity contracted with the Company to perform services on our behalf.

## IV. Policy

True to its core values, The Cigna Group strictly prohibits Human Trafficking. Workforce Members must not engage in any practice, or conduct business with any Supplier, that constitutes Human Trafficking. This includes, but is not limited to, a strict prohibition on any of the following activities:

1. Engaging in any form of trafficking in persons;
2. Procuring commercial sex acts;
3. Using forced labor in the performance of any work;
4. Destroying, concealing, or confiscating an employee’s identity or immigration documents, or otherwise denying an employee access to their identity or immigration documents, such as passports or driver’s licenses, regardless of issuing authority;
5. Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information, or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
6. Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
7. Charging employees recruitment fees;
8. With regard to certain transportation costs, failing to provide return transportation or pay for the cost of return transportation upon the end of employment for employees who are not nationals of the country where they are working if the employee is brought to that country for the purposes of working on a U.S. government contract;
9. Providing or arranging housing that fails to meet the host country’s housing and safety standards; or
10. If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee’s work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

## V. Procedure

The Cigna Group will promptly and thoroughly investigate any claim that an employee, a consultant, an independent contractor, or a supplier is engaging in trafficking in persons. If an employee is found in violation of this policy, disciplinary action, up to and

including termination of employment, may occur. If a supplier is found in violation of this policy, appropriate remedies will be taken, which may include suspension of payments or termination of services.

## VI. Compliance Program Elements

### REPORTING VIOLATIONS

Any member of the Company Workforce who suspects or has observed any violation of the Compliance Program or this Policy has an obligation to report the concern and is able to report such violations to his/her manager, the Ethics Help Line, the Ethics Office, the Compliance Department, or a lawyer in the Legal Department.

### PROTECTION AGAINST RETALIATION

The Company prohibits any Workforce Member from retaliating, intimidating, harassing, threatening, or taking adverse action against anyone for raising or helping to resolve an ethics or compliance concern, for reporting suspected or known violations of the law or against the Company Code of Ethics or Compliance Policies and Procedures, or for reporting suspected fraud, waste, or abuse.

Individuals should immediately report any retaliation, intimidation, harassment, or threat of any of the foregoing for raising or helping to resolve a compliance concern by contacting the Ethics Help Line at The Cigna Group [EthicsPoint.com](https://www.ethicspoint.com) or by telephone:

- Inside the U.S., call toll-free by dialing 800.472.8348.
- Outside the U.S., please follow the dialing instructions [here](#).

Such reporting may be confidential and anonymous.

### POLICY ENFORCEMENT

Any member of the Company's Workforce who violates Company Compliance Policies and Procedures, applicable laws or regulations, or federal payor or client compliance requirements may be subject to disciplinary actions up to and including termination.

## VII. Policy Contacts

### COMPLIANCE DEPARTMENT

[Ethics@Cigna.com](mailto:Ethics@Cigna.com)





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