

Occupational Health and Safety (OH&S) Policy

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I. Purpose

This policy establishes the Occupational Health and Safety (OH&S) Policy for The Cigna Group and its subsidiaries and affiliates (collectively “Cigna” or the “Company”). The Occupational Health and Safety Policy is intended to provide a framework for a comprehensive occupational health and safety process.

II. Scope

This policy applies to all Cigna enterprise facilities and employees in the United States. Non-U.S. facilities shall comply with all applicable local regulations for worker safety and health.

III. Policy Statement

Cigna is committed to workplace health and safety, providing a safe working environment, preventing work-related injuries and illnesses, and meeting or exceeding applicable occupational health and safety regulations.

Cigna operations must comply with all federal, state and local requirements. In states which have an OSHA-approved State Plan that covers private workplaces, operations must be aware of and comply with the regulatory requirements under that State Plan. Requirements under OSHA-approved State Plans must be at least as effective as Federal OSHA requirements in protecting workers and in preventing work-related injuries, illnesses and deaths.



Certain OSHA-approved State Plan states have enacted requirements for employers to establish and maintain a written safety plan or program, often referred to as an Injury and Illness Prevention Program (IIPP) or Accident Prevention Program (APP). Company locations which operate in such states will comply with all specific state requirements and make their written safety program available to all of their employees, in addition to making the company process available to all employees.

IV. Standards & References

29 CFR 1910 Occupational Safety and Health Standards

29 CFR 1926 Safety and Health Regulations for Construction OSHA-approved State Plan Link: <https://www.osha.gov/stateplans/>

OSHA-approved State Plan Link to Safety and Health Standards and Regulations: <https://www.osha.gov/stateplans/statestandards>

International Organization for Standardization ISO 45001:2018, Occupational health and safety management systems – Requirements with guidance for use

OSHA Publication 3885:2016, Recommended Practices for Safety and Health Programs

Cigna Environmental, Health & Safety Policies and Procedures

Cigna Code of Ethics and Principles of Conduct

V. Terms and Definitions

Accident - An incident which results in harm (i.e. injury or illness) or damage.

CFR - Code of Federal Regulations

Contractor - An individual or firm that agrees to furnish materials or perform services at a specified price, and controls the details of how the work will be performed and completed.

Hazard (or "Unsafe Condition") - A condition with the potential to cause harm or damage.

Host Employer - An employer who has general supervisory authority over the worksite, including controlling the means and manner of work performed and having the power to correct health and safety hazards or require others to correct them.

Illness - An abnormal condition or disorder. Illnesses include both acute and chronic illnesses, such as, but not limited to, skin disease, respiratory disorder, or poisoning.

Incident (Safety) - An event that has the potential to, or actually causes, harm or damage to people or property.

Injury - An abnormal condition or disorder. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation.

Near Miss (or "Close Call") - An incident which has the *potential* to cause harm or damage.

OSHA - Occupational Safety and Health Administration

Staffing Agency - A firm that provides temporary workers to host employers. A staffing agency hires its own employees and assigns them to support or supplement a client's workforce in situations involving employee absences, temporary skill shortages, seasonal workloads, and special projects.

VI. Process

1. Task 1: Management Leadership

- 1.1. Management visibly demonstrates and communicates their health and safety commitment to workers and others, sets program expectations and responsibilities, and demonstrates commitment to continuous improvement to the occupational health and safety (OH&S) process.
- 1.2. Managers at all levels make health and safety a core value. Managers are fully committed to:
 - 1.2.1. Eliminating and controlling hazards, risk reduction, and a safe and compliant workplace;
 - 1.2.2. Proactive safety efforts and the prevention of work-related injuries and illnesses;
 - 1.2.3. Integrating OH&S requirements into the organization's business processes – making safety a part of their business;
 - 1.2.4. Establishing OH&S goals and objectives and defining and implementing safety plans;
 - 1.2.5. Providing adequate resources, support, and competencies to implement and maintain the OH&S process;
 - 1.2.6. Setting an example through their own actions and promoting a positive safety culture. Engaging and recognizing safe behaviors and safety efforts of workers;
 - 1.2.7. Understanding and ensuring compliance with applicable occupational health and safety regulations;
 - 1.2.8. Establishing, implementing, and maintaining a system for communicating with workers about health and safety matters. Information should be presented in a manner readily understood by the affected workers; and,
 - 1.2.9. Continuously improving workplace health and safety.

2. Task 2: Worker Participation

- 2.1. An effective safety and health process involves participation from all workers. Worker participation means that workers at all applicable levels and functions are involved in establishing, operating, evaluating, and improving the health and safety process.
- 2.2. Workers and their representatives are involved in all aspects of the program, including setting goals, identifying and reporting hazards,

investigating incidents, tracking progress, and participating on teams such as Safety Committees, Emergency Response Teams, and project teams.

- 2.3. Workers are encouraged and have means to communicate openly with management and to raise health and safety concerns, report injuries, illnesses, and hazards, and participate in the health and safety process without fear of retaliation.

3. Task 3: Hazard Identification and Assessment

- 3.1. Each company location must implement a comprehensive, proactive, and ongoing process to identify and assess workplace hazards.

- 3.2. Hazard identification and assessment may include some or all of the following methods and activities:

- 3.2.1. Collection and review of information about hazards or potential hazards in the workplace.
- 3.2.2. Conduct of periodic inspections, assessments, and observations of the workplace to identify new or recurring hazards.
- 3.2.3. Investigation of injuries, illnesses, incidents, and near misses to determine the underlying hazards, their causes, and health and safety process deficiencies.
- 3.2.4. Grouping of similar incidents and identifying trends in injuries, illnesses, and hazards reported.
- 3.2.5. Considering hazards associated with emergency or nonroutine situations.
- 3.2.6. Determining risk level through frequency/severity/likelihood of incidents that could result from hazards identified, and using this information to prioritize corrective actions.
- 3.2.7. Where feasible, fixing hazards immediately as they are found. Where this is not feasible, people will be protected through interim measures until hazards are eliminated or controlled.

4. Task 4: Hazard Prevention and Control

- 4.1. Effective controls protect workers from workplace hazards; minimize or eliminate safety and health risks; help prevent injuries, illnesses, and incidents; and help provide workers with safe and healthful working conditions.

- 4.2. Hazard control and prevention may include some or all of the following methods and activities:

- 4.2.1. Involvement of workers, who often have the best understanding of the conditions that create hazards and insights into how they can be controlled.
- 4.2.2. Identification and evaluation of options for controlling hazards, using a "hierarchy of controls." Refer to Attachment 1, Hierarchy

of Controls. The hierarchy of controls, listed from most effective to least effective, include:

- 4.2.2.1. Elimination (physically remove the hazard);
- 4.2.2.2. Substitution (replace the hazard);
- 4.2.2.3. Engineering Controls (isolate people from the hazard);
- 4.2.2.4. Administrative Controls (change the way people work);
and,
- 4.2.2.5. Personal Protective Equipment (PPE) (protect the worker with PPE).

- 4.2.3. Use of a hazard control plan to guide the selection and implementation of controls, and implement controls according to the plan.
- 4.2.4. Development of plans with measures to protect workers during emergencies and nonroutine activities.
- 4.2.5. Evaluating the effectiveness of existing controls to determine whether they continue to provide protection, or whether different controls may be more effective. Review of new technologies for their potential to be more protective, more reliable, or more efficient.

- 4.3. Management will ensure that change is managed in a safe manner by safe design and planning, and incorporating safety measures into the change.

5. Task 5: Awareness and Understanding – Education and Training

- 5.1. Workers are provided knowledge and skills through training to enable them to perform their work safely and avoid creating hazards that could place themselves or others at risk. Training provides awareness and understanding of workplace hazards and how to identify, report, and control such hazards.
 - 5.1.1. Employees receive annual 'Safety in the Workplace' training that provides baseline training in OSHA and company safety compliance, as well as fundamental safety and health elements, including incident prevention.
 - 5.1.2. Supplemental training is provided based on the type of work employees perform and the workplace hazards that may be encountered.

6. Task 6: Process Evaluation and Improvement

- 6.1. The occupational health and safety process must be evaluated periodically to ensure that it is operating as intended, is effective in controlling identified hazards, and is making progress toward established health and safety goals and objectives and safety action plans.

- 6.2. Audits, assessments, observations, and evaluations will be conducted to promote compliance, safety and continuous improvement.
 - 6.3. Necessary actions are taken to identify and address opportunities for improvement and improve the process and overall health and safety performance.
7. Task 7: Coordination for Host Employers, Contractors, and Staffing Agencies
- 7.1. Host employers, contractors, and staffing agencies commit to providing the same level of health and safety protection to all workers and those at risk. Departments and business groups who oversee, select or employ contractors or staffing agencies shall ensure that an awareness and understanding of health and safety expectations are effectively communicated and that they provide oversight of their performance. Host employers establish specifications and qualifications for contractors and staffing agencies.
 - 7.2. Host employers, contractors, and staffing agencies communicate the hazards present at the worksite and the hazards that work of contract workers may create on site and ensure proper safeguards are in place to prevent safety incidents.
 - 7.3. Before beginning work, host employers, contractors, and staffing agencies coordinate on work planning and scheduling to identify and resolve any issues that could affect health or safety, and plan safety into the process.

VII. Roles & Responsibilities

Safety is everyone's responsibility. Management, supervisors, and workers at each level of the organization shall assume responsibility for those aspects of health and safety over which they have control, will make safety a part of their job, and will set a positive example for others. Everyone is required to work safely.

Employees

Follow safe work practices and the company's policies and procedures for working safely.

Report all hazards, injuries and illnesses, and near-misses immediately, no matter how slight.

Participate in all required health and safety training.

Consult with supervisors or managers for any safety concerns or uncertainty.

Participate in improving health and safety and assisting in maintaining a safe work environment.

Supervisors and Managers

Ensure that all health and safety policies and procedures are clearly communicated and understood by all employees.

Communicate regularly with employees regarding health and safety and health and safety process components. Respond promptly to employee concerns.



Set a good example by always following safe work practices.

Establish and maintain a system of positive coaching and reinforcement. Recognize employees who perform safe and healthful work practices and exhibit safe behaviors.

When counseling employees is necessary, considering the totality of the circumstances, counseling will be administered in a fair and equitable manner and in accordance with company policy.

Take overall responsibility and accountability for the prevention of injuries and illnesses at the sites and areas under their responsibility.

Create an environment where reporting of health and safety concerns is expected, without fear of retaliation.

Participate in regular health and safety inspections, observations, assessments, audits, and incident investigations.

Verify that corrective actions are implemented following incidents and identification of hazards.

Ensure that equipment and work areas under their direction are safe, well kept, and in compliance with applicable health and safety regulations and requirements.

Ensure that workers receive and participate in the required health and safety training, and any additional training necessary as appropriate to their job function.

Support the establishment and functioning of health and safety committees.

Maintain records of the health and safety process components covered in this policy.

Notify Global Risk Management-Safety at the start of any occupational health and safety regulatory agency contacts or visits.

Ensure and promote continuous improvement to the health and safety process.

Global Risk Management – Safety

Develops and maintains health and safety policies and procedures, and performs a review as needed, at least on an annual basis.

Supports all departments and company locations in their health and safety efforts. Supports leadership teams, safety committees, emergency response teams, and others.

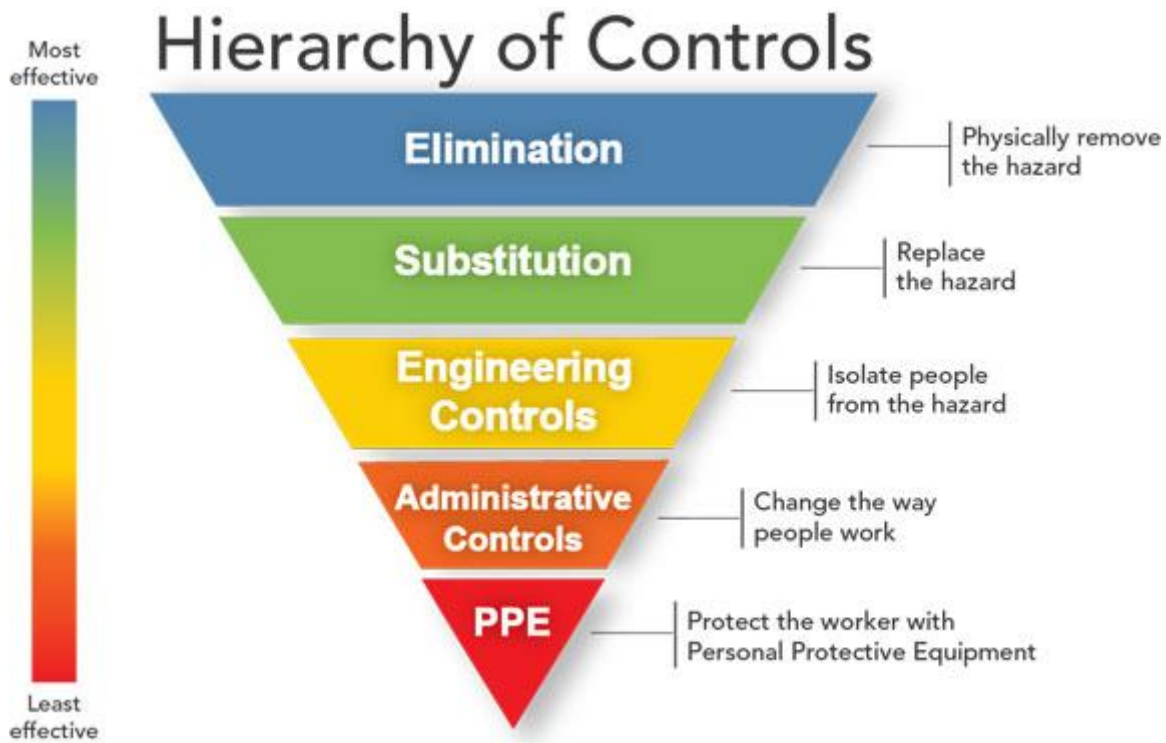
Supports and helps to define safety action plans at the organizational and company location level.

Responsible for occupational health and safety regulatory agency (e.g. OSHA) contacts or visits, communications, correspondence, and reporting.

Overall responsibility for health and safety support, direction, and oversight for the organization.

VIII. Attachments

Attachment 1: Hierarchy of Controls



Source: [National Institute for Occupational Safety and Health \(NIOSH\)](https://www.cdc.gov/niosh/publications/10088.html)