

# The Cigna Group Supplier Code of Ethics





## We are The Cigna Group.

The Cigna Group is a global health service company dedicated to improving the health and vitality of those 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 the provision of services that meet the needs of our clients, customers, employees and business partners.

In addition, we pride ourselves on our commitment to compliance and to acting ethically and with integrity in all our interactions. We expect the same commitment from the suppliers identified by our supply chain management organization ("Suppliers"). As part of The Cigna Group Supplier Code of Ethics ("Code"), we request that our Suppliers demonstrate ethics, compliance and integrity in three pillars.

The agreement between a Supplier and The Cigna Group 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 The Cigna Group, the terms of the agreement will govern.

### **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 The Cigna Group assets, intellectual property and confidentiality
- Protect The Cigna Group customer, employee and client privacy
- Not profit from or disclose nonpublic information acquired through The Cigna Group
- Disclose any actual or potential conflicts of interest
- Comply with all anti-corruption laws
- Support an inclusive supply chain

### **Integrity in the environment**

- Comply with all applicable environmental laws and regulations
- Minimize and reduce waste, reduce carbon footprint and conserve water

This Code outlines the principles and guidelines The Cigna Group requests its Suppliers to adhere to when providing services or products to The Cigna Group. Suppliers should ensure that their suppliers and subcontractors also adhere to the principles and guidelines outlined in this Code. The Cigna Group 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 through 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**

Suppliers 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' rights to a living wage; this includes ensuring that compensation is enough to meet basic needs, provides some discretionary income and is not subject to deductions, 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, as well as 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 The Cigna Group assets at all times. Suppliers, with permission from The Cigna Group, may use The Cigna Group assets only to provide services or fulfill their contractual obligations to The Cigna Group. The Cigna Group 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 The Cigna Group issues to Suppliers and their employees are for the exclusive use of the intended recipient only, for the specific business purpose for which The Cigna Group issued them, and not to be shared with others. Suppliers must promptly report any activities that may compromise the security or confidentiality of The Cigna Group data or information systems.

## Audits and monitoring

Suppliers should create and maintain policies and procedures to monitor and audit compliance with laws and regulations affecting its business. The Cigna Group may request documentation and supporting evidence of compliance to Supplier facilities or business practices associated with their environmental, social and governance (ESG) standards.

## Intellectual property and confidentiality

Suppliers must protect The Cigna Group intellectual property and maintain the confidentiality of The Cigna Group 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

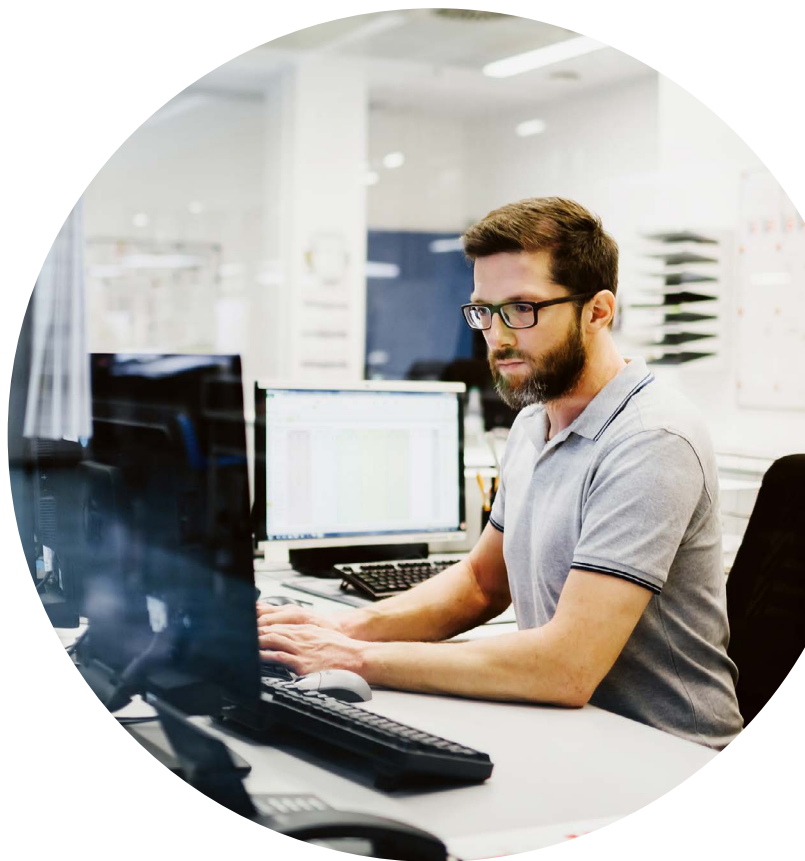
Suppliers should disclose to The Cigna Group any actual or potential conflicts of interest in doing business with The Cigna Group this includes whether any of a Supplier's workers, investors or otherwise affiliated persons have a familial relationship with anyone at The Cigna Group who can make decisions affecting the Supplier's business with The Cigna Group.

## Privacy

Suppliers must protect The Cigna Group customer, employee and client privacy and confidentiality in accordance with the terms of the agreement between the Supplier and The Cigna Group. Suppliers are responsible for knowing and complying with all information protection and privacy laws that apply to their obligations with The Cigna Group. Suppliers may only collect, use, retain or share information needed to fulfill its contractual obligations to The Cigna Group, and they must immediately notify The Cigna Group of any potential data or privacy breach, unless otherwise stated in an executed agreement with The Cigna Group.

## Inclusive supply chain

Suppliers should provide certified business enterprises the opportunity to participate in The Cigna Group supplier base through subcontract or other work orders in support of our business. Certified Business Enterprises are defined as small business enterprises or women-, disability-, LGBTQ+-, veteran- or minority-owned business enterprises.



# Integrity in business conduct (CONTINUED)

## **Insider trading**

Suppliers cannot purchase, sell or trade The Cigna Group securities while in possession of material nonpublic information regarding The Cigna Group. Suppliers and Supplier employees must never directly or indirectly disclose nonpublic information acquired by conducting business with The Cigna Group.

## **Anti-corruption**

Suppliers must not pay or offer anything of value, including gifts, meals and entertainment, to any government official, employee of a state-owned enterprise or political candidate for office in order to improperly influence such person or improperly obtain or retain business. Cigna expects all Suppliers to comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, the Anti-Kickback Statute 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 the [Anti-Corruption Compliance Policy of The Cigna Group](#).

## **Ineligible or excluded persons**

Any Supplier and its personnel responsible for the performance of services in support of federal health care programs are bound by the rules and regulations governing Government-Wide Debarment and Suspension (non-procurement). Suppliers and their personnel must not be an “Ineligible Person”—i.e., excluded from participation in any federal health care program excluded by the U.S. Department of Health and Human Services (HHS) Office of Inspector General (OIG) List of Excluded Individuals/Entities, or excluded by the General Services Administration (GSA) or from any other federal or state program, including state

Medicaid program exclusion lists (Exclusion Lists). Suppliers must immediately disclose to The Cigna Group if they or their personnel become an Ineligible Person. Suppliers must maintain a documented process for reviewing the Exclusion Lists. Suppliers must review the Exclusion Lists prior to hiring or assigning Supplier Personnel to perform services in support of federal health care programs on behalf of The Cigna Group, and monthly thereafter, to ensure that any such Supplier Personnel is not excluded from any federal or state health care programs. If any such Supplier Personnel is found to be excluded, such excluded Supplier Personnel must immediately be removed from any work related directly or indirectly to the support of federal health care programs on behalf of The Cigna Group and be subject to appropriate corrective action.

## **Antitrust**

Suppliers must not enter into agreements or take actions that unreasonably restrain trade or are deceptive and misleading.

## **Economic sanctions and trade restrictions**

The Cigna Group will not do business with Suppliers that operate in or derive revenue from countries sanctioned by the U.S. Government or with Suppliers that are on any list of sanctioned persons or entities as designated by the U.S. Government. Suppliers should also not participate in any boycott of a country unless sanctioned by the U.S. 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. Suppliers must abide by any legal requirements pertaining to government contracting.



## Integrity in the environment

As a company whose mission is to improve the health and vitality of those we serve, we take a precautionary approach to our environmental sustainability efforts. We also aim to serve as a connector and catalyst for change to protect global access to healthy air, water, soil and food. Because we are keenly focused on the connection between planetary health and human health, we recognize managing environmental risks and opportunities is important to our business; thus, through our supplier sustainability efforts, we expect to do business with companies that have high environmental sustainability standards and embrace the following responsibilities.

### **Environmental footprint**

Suppliers are expected to be committed to reducing energy and water consumption, lowering greenhouse gas emissions, protecting biodiversity, and producing less waste from their operations wherever feasible and applicable.

### **Environmental partnership**

Suppliers are expected to work with The Cigna Group to implement sustainable processes and correct issues to drive continuous improvement and societal and environmental value.

### **Environmental disclosure and transparency**

Suppliers will accurately disclose information regarding their environmental practices and are expected to cooperate with reasonable information requests from The Cigna Group to confirm their fulfillment of these responsibilities.

### **Environmental compliance**

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

## Whom to contact

No code can possibly answer every question or anticipate every situation. A Supplier may ask questions or report to The Cigna Group any concerns regarding compliance with this Code, or other standards pertaining to Suppliers' provision of services, by contacting their The Cigna Group relationship manager or the Ethics Help Line, which is available 24 hours a day, seven days a week:

- Inside the U.S., call **800.472.8348** toll-free.
- Outside the U.S., follow the dialing instructions located at [cigna.ethicspoint.com](https://cigna.ethicspoint.com).

Suppliers may also access the Help Line via the web at [cigna.ethicspoint.com](https://cigna.ethicspoint.com). Suppliers can report anonymously on the Ethics Help Line.



## Responsible business documents

[Code of Ethics | The Cigna Group](#)

[Corporate Responsibility | The Cigna Group](#)

[Environmental Policy Statement | The Cigna Group](#)

[Privacy Information | The Cigna Group](#)



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