

CIGNA CODE OF ETHICS

Ethics and Compliance at CIGNA ...

Every employee, every decision, every day

OVERVIEW OF ETHICAL PRINCIPLES

CIGNA's Code of Ethics is based upon the following ethical principles:

We will comply with applicable law, rules and regulations.

We will avoid conflicts of interest.

We will protect CIGNA assets.

We will behave ethically.

These ethical principles are the core of CIGNA's compliance program and of this Code, and form the basis of the policies and procedures that supplement the Code.

INTRODUCTION

As employees, officers and directors of CIGNA, its subsidiaries and affiliated companies we represent CIGNA at all times. Our words and actions reflect not only ourselves, but the Company as well. We hold ourselves to high standards, as do our customers and others whom we serve. That is why it is important to maintain a code of ethical behavior — to assure that our conduct is above reproach and reflects CIGNA's commitment to legal compliance, integrity, and ethical conduct. It begins with a set of ethical principles, which support CIGNA's Guiding Framework and help to define how we work together.

You are responsible for knowing, understanding and complying with this Code of Ethics as well as the company's policies and procedures that apply to your work. All of the CIGNA policies and procedures that supplement the Code are available on Your CIGNA Life website. CIGNA also requires formal training on the Code of Ethics and the Company's policies on a routine basis.

If you have any questions or concerns about what would be the right decision or action to take, or if you observe or hear about questionable decisions or actions by others, you should contact a member of the Ethics Office or the Ethics Help Line by calling 1.800.472.8348 or by sending an e-mail to ethics@CIGNA.com.

CIGNA'S COMMITMENT

The ethical principles are the foundation of CIGNA's unwavering commitment to legal compliance, integrity, and ethical conduct. They are at the heart of our commitment to *do the right thing for CIGNA*. At CIGNA, we are committed to:

- Take all the right actions to ensure that we, and CIGNA, comply with all laws, rules and regulations that apply to our business worldwide;
- Conduct business in a way that avoids any conflict, or even the appearance of a conflict, between our own personal interests and CIGNA's interests;
- Take all the right steps to protect CIGNA's assets (e.g. property, information, and financial records) from loss, damage, or misuse; and
- Behave ethically in a way that reflects CIGNA's commitment to do what is right, honest and fair.

Each of the principles is discussed more fully below.

I. Complying with Laws, Rules and Regulations

You are not required to know the specifics of all laws, rules and regulations, but, you are expected to:

- Be generally familiar with the laws and other requirements that are important to your business and the area in which you work;
- Take all necessary and reasonable actions to ensure that you, and CIGNA, comply with those requirements; and
- Get the answers you need when questions arise about your obligations or those of the company.

Highlighted below are selected examples of laws that we all need to understand because they apply broadly throughout CIGNA's business.

Antitrust & Fair Competition Restrictions

It is CIGNA's policy to strictly comply with antitrust laws. These laws promote healthy competition by prohibiting agreements that restrict free trading and competition, banning anti-competitive practices and requiring approval of transactions that may threaten the competitive process. These laws govern many of CIGNA's activities, such as pricing, purchasing, marketing and selling products or services. Because of the importance of these laws to CIGNA's business, all employees are expected to fully familiarize themselves with the Company's policy on antitrust compliance and report any behavior that they suspect of violating that policy or the law.

Working Globally

Because CIGNA does business beyond the borders of the United States, we must take care to comply with those laws that govern business in and with foreign countries. For example, the Foreign Corrupt Practices Act and other anti-bribery and anti-corruptions laws prohibit offering or giving anything of value (e.g., payments, gifts or entertainment) to a government official in order to obtain or retain CIGNA's business, or gain an improper advantage. You are also required to understand and comply with other laws, rules and regulations that apply to your job responsibilities and your business location, such as anti-boycott, export control, and anti-money laundering laws.

Working with the Government

When CIGNA's products or services are paid for (even partially) by a government program, we may be subject to additional legal requirements that pertain to government contracting. CIGNA employees, officers and directors are expected to comply with all applicable rules and regulations, including specific rules that prohibit: intentionally requesting or receiving any compensation (including free or below-cost services) in return for recommending or arranging for the purchase of goods, items or services reimbursable by the government; and the submission of any false, fraudulent, or misleading information about the services CIGNA provides directly or indirectly to the government.

Privacy and Confidentiality

We are committed to respecting the privacy of the individuals we serve as well as the confidentiality of our customers' information. If you have access to personal information, you must comply with the complex body of laws and regulations that protect individuals' privacy rights, and you must ensure that any information we receive from the individuals and companies that we serve is kept secure and confidential. CIGNA maintains policies and procedures with more

detailed information on the importance of protecting personal and confidential information, and internal resources who can address questions and provide additional guidance.

Securities Transactions & Insider Trading

You must comply with the federal laws and regulations that prohibit trading in securities while in possession of material non-public information (about CIGNA or another entity). This practice is commonly called “insider trading” and can harm CIGNA's business, shareholders and/or other stakeholders, and can have damaging effects on CIGNA's business relationships and reputation. You are expected to refrain from trading on the basis of inside information gained during the course of employment and from sharing inside information with anyone (even family members or friends).

II. Avoiding Conflicts of Interest

At CIGNA, we must conduct our business in ways that avoid actual or apparent conflicts of interest. Conflicts of interest may arise from a direct or indirect financial, business or personal involvement with a current or potential supplier, competitor, customer or employee. It also applies to any outside financial or business involvement by immediate family members or close personal friends. Listed below are some examples of common conflicts of interest to avoid.

Gifts and Entertainment

Although business gifts and entertainment can enhance goodwill and sound working relationships, they can also be used to influence business decisions — or could appear to influence them. For this reason, CIGNA strictly limits their use. For example, CIGNA employees are not permitted to give or accept expensive or lavish gifts to or from employees, customers, suppliers or others doing business with, or contemplating doing business with, CIGNA. The Company maintains specific policies and procedures designed to provide guidance to all of our employees, and it is our responsibility to ensure that we familiarize ourselves and comply with those policies.

Political Contributions

CIGNA encourages its employees, officers and directors to participate in the political process as private citizens. However, when any one of us makes political contributions or engages in political activities on a personal basis, care must be taken to clearly distinguish personal political views from those of the Company. We must keep in mind that any use of CIGNA equipment, supplies, time, facilities, phones or administrative support in connection with any sort of political activity would not only be a misuse of Company assets, but also could be considered a "political contribution" and may violate laws, and CIGNA's policies, that apply to corporate contributions.

Corporate Opportunities

Each of us owes a duty to the Company to advance the Company's interests. So when presented with business opportunities through your job or your access to the Company's property or information, you must pursue them as the Company's opportunities and may not use them for personal gain. Examples of the inappropriate pursuit of corporate opportunities include drawing away potential or existing customers from CIGNA, taking advantage of business offers made to the company, or purchasing property that the company needs or is contemplating acquiring.

III. Protecting CIGNA Assets

We are all entrusted with the assets of the Company, its business partners, and the companies and individuals we serve. It is critical to our business, our relationships and our reputation that we take all reasonable actions necessary to guard the integrity, confidentiality and value of those

assets. Below are examples of the actions you must take everyday to maintain the trust that is placed in each of us:

- Follow CIGNA's policies that require us to maintain business records in compliance with applicable legal, regulatory and business requirements;
- Ensure that information regarding the Company's business, its customers and/or its business partners is handled carefully and is only disclosed to authorized persons on a need-to-know basis;
- Strictly avoid the improper use of any asset entrusted to us as an employee, officer or director of CIGNA;
- Protect CIGNA's assets in the marketplace through the use of confidentiality stamps, trademarks and service marks, and copyright symbols, and take care to avoid any inappropriate or unauthorized disclosure; and
- Respect the intellectual property rights and protections of other individuals and entities.

It is all of our responsibility to live by and reinforce these principles in the ordinary course of our business and to consult the CIGNA policies and procedures supporting these principles for more detail and guidance.

IV. Behaving Ethically

At CIGNA, we are committed to sustaining a culture where ethical behavior is valued, recognized, and demonstrated by all of our representatives. We expect the best of ourselves and of each other – as do our customers and others whom we serve – and each of us will take personal responsibility for our actions and decisions. Behaving ethically in the operation of our business requires that we do what is right, honest and fair at all times, and that we interact with unyielding integrity with the companies and individuals we serve, as well as our colleagues, our shareholders and the public. Below are just some of the ways in which we at CIGNA uphold this ethical principle.

Our Work Environment

CIGNA's work environment reflects CIGNA's commitment to the highest standards of conduct and to its role as a good corporate citizen. CIGNA promotes diversity and equal opportunity in employment. Each of us is responsible for maintaining a positive work environment and ensuring that all individuals are treated with respect and dignity. Our employment-related decisions must be based upon an individual's skills, qualifications and job performance. There is no tolerance for decisions based on any factors that are discriminatory and prohibited by law — including 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.

In addition, we do not tolerate harassment, which includes any type of verbal or physical behavior that is intimidating, threatening or demeaning (examples include racist, sexist or ethnic comments or jokes, or hazing). Harassment is not only unacceptable in CIGNA's offices but also in any other CIGNA work setting, at a CIGNA-sponsored event, or using CIGNA's electronic assets (e.g., email, voice mail, and Internet access).

Our Shareholders and Stakeholders

CIGNA is committed to providing its investors and other stakeholders with accurate, complete and timely reports regarding CIGNA's financial condition and results of operations. At CIGNA, we understand that the way this information is handled, maintained and reported can have a

significant impact on CIGNA's reputation and management's ability to make sound decisions. For this reason, we are committed to ensuring that transactions are recorded completely, accurately and on a timely basis, and that internal and external reports and communications are full, fair, timely, accurate and understandable.

In addition, CIGNA is committed to ensuring that each of its investors has access to material information regarding its operations, results and condition at the same time, so that no investor is unfairly disadvantaged with respect to Company information. The Company has a number of processes and policies in place to support its commitment.

Our Customers and Business Partners

At CIGNA, we value our relationships with our customers and business partners and take great care to preserve the integrity of those interactions. Because of this, we believe that it is of paramount importance that all of the Company's representatives accurately represent the Company, our products and our services. We must not allow anyone who represents CIGNA to misrepresent material facts regarding our business, conceal information necessary to understand our proposed business transactions or engage in unlawful, unfair or fraudulent business practices. By adhering to these standards, we can help CIGNA succeed in the marketplace in a manner that makes all of us proud of the work that we do and the Company we represent.

V. Monitoring and Enforcing Compliance with the Code of Ethics

Violations of the Code of Ethics are subject to disciplinary action, up to and including termination. In some cases, civil and criminal penalties may apply to such violations.

It is the obligation of every employee, officer and director who knows of or reasonably suspects a violation of CIGNA's Code of Ethics to promptly report it. Unless a specific policy states otherwise, the report may be oral or written, and made to:

Ethics Help Line - 1-800-472-8348

Ethics Mailbox: ethics@CIGNA.com

CIGNA will not discriminate or retaliate against anyone who, in good faith, reports violations of laws or regulations, the Code of Ethics, or other company policies, whether those violations are by a CIGNA company, another employee or agent. In addition, employees are protected by federal law against any retaliation for taking action under the federal False Claims Act.

When submitting a report, individuals are encouraged to provide their name to facilitate investigation and follow-up; however, the report may be submitted anonymously. If a member of management, a Compliance Officer or a member of CIGNA's legal department receives the report, he or she must report it to the Ethics Help Line.

The General Auditor and the Chief Compliance & Ethics Officer and/or their designees will investigate alleged violations of the Code of Ethics. As necessary, they may report the violation to public officials for investigation and/or prosecution and take action to maximize recovery of assets.

Compliance with CIGNA's Code of Ethics is subject to audit and we will be asked to affirm our commitment to the Code on a routine basis. The General Auditor will periodically report to the Audit Committee of the Board of Directors on compliance with the Code of Ethics. In addition, any violation that might significantly harm CIGNA's reputation or have a material effect on its financial condition will be reported to the Audit Committee as soon as practicable.

In very limited circumstances, the Chief Compliance & Ethics Officer may grant a waiver to a provision or provisions of the Code of Ethics. Any requests for a waiver to any provision included

in this Code of Ethics must be in writing and addressed to the Chief Compliance & Ethics Officer outlining the reasons for the request. A waiver will only be given when deemed appropriate under the circumstances, and the Board of Directors must authorize any waivers for executive officers and directors of CIGNA Corporation. These waivers will be promptly disclosed when required by applicable law.

CIGNA may update the Code of Ethics from time to time and in the event of changes to any provision of the Code, the Company's Enterprise Compliance department will provide us with notification of these changes.

*Ethics and Compliance at CIGNA ...
Every employee, every decision, every day*

November, 2008