

Political Contributions/Government Contacts

Purpose and Scope

It is CIGNA's policy to comply with all U.S. and foreign laws and regulations related to government contacts, lobbying, and political contributions, and to maximize the effectiveness of CIGNA's grassroots and employee advocacy efforts. This policy applies to employees, directors and agents of CIGNA Corporation and its subsidiaries. Violations of this policy may result in disciplinary action, including termination of employment.

Policy

CIGNA obeys all laws in promoting its positions to government authorities and making political contributions.

Policy Operation

As an employee, director or agent of a CIGNA company, you must be aware of the specific guidelines for interaction with government entities.

Government Contacts and Lobbying – Employees are permitted to have contact with foreign or domestic government officials or employees (such as agency and department employees and regulators) in order to conduct CIGNA's routine ordinary course business. Other contacts with government officials or employees must be initiated through CIGNA's Regulatory Affairs department or Policy and Government Affairs department, such as:

- presentation of testimony and information;
- handling requests for assistance by government officials;
- advocacy or lobbying on industry or public issues of interest to CIGNA; or
- inviting or hosting government officials or candidates for elected office to visit CIGNA's corporate facilities to meet employees.

The General Counsel has sole responsibility for retaining outside lobbyist and/or law firms for lobbying purposes and overseeing and approving lobbying activity. If you are authorized by the General Counsel to engage in political activity on CIGNA's behalf, you must comply with all applicable U.S., federal, state, foreign or local laws. These may require you to register as a lobbyist and/or report lobbying activity. If you have any questions, contact [CIGNA Policy and Government Affairs](#).

Gifts or Entertainment – Employees are not permitted to provide gifts or entertainment to any foreign or domestic government official employee (including employees of businesses owned or controlled by a government) without the prior approval of the Ethics Office.

Political Contributions - CIGNA's political action committee -- CIGNA PAC -- makes political contributions on behalf of CIGNA's business interests. CIGNA PAC is funded by the voluntary contributions of participating eligible employees. In rare circumstances, political contributions are made by CIGNA Corporation and/or its subsidiaries -- outside of CIGNA PAC -- but only with the prior approval of the Chief Executive Officer and the General Counsel. Political contributions include the following when used to benefit candidates, political parties or political action committees (except CIGNA PAC) in connection with a referendum or other ballot initiative, or in support of a political event:

- cash (donations or payment of a fee);
- use of CIGNA resources (equipment, supplies, computing or communications networks, facilities or similar resources; and
- the assistance of CIGNA personnel.

You must not request or authorize employee reimbursement for any expenses incurred in attending political events or for any political contributions. Corporate contributions for political events must be approved in advance by the Chief Executive Officer and the General Counsel.

Grassroots & Employee Advocacy -- CIGNA may ask employees and others (as appropriate) to contact state or federal legislators as a constituent about issues that are important to the Company. Participation in

the advocacy process is encouraged, but is strictly voluntary. You are encouraged to participate in the democratic process, on your behalf, so long as your involvement does not interfere with satisfactory work performance or create the impression that you are speaking or acting on CIGNA's behalf. See CIGNA's policy on [External Communications and Fair Disclosure](#).

Service as an Elected or Appointed Government Official -- Employees may serve in an elected or appointed government position if their service is permitted under the CIGNA's [Conflicts of Interest](#) policy.

Where to Get Help

The Enterprise Compliance organization is responsible for interpreting this policy in consultation (as appropriate) with the subject matter expert(s). You may contact a member of the [Ethics Office](#) within the Enterprise Compliance Organization if you have any questions. You should also feel free to speak to your manager if you have any concerns or questions, or contact the Ethics Help Line by calling 1.800.472.8348 or by sending an e-mail to ethics@CIGNA.com.

Reporting Policy Violations

Ethics Help Line: 1-800-472-8348

Ethics Mailbox: ethics@CIGNA.com

Related Policies and Procedures

[Antitrust and Fair Competition](#)

[Board Memberships and Other Non-CIGNA Professional Roles](#)

[Charitable Contributions](#)

[Conflicts of Interest](#)

[Communications and Fair Disclosure](#)

[Gifts and Entertainment](#)

[Purchasing](#)