

CIGNA CODE OF ETHICS AND COMPLIANCE POLICIES

Overview

CIGNA is committed to integrity, ethical behavior and professionalism in all areas. It is CIGNA's policy to comply with all federal, state, local, and non-US laws and regulations that govern the conduct of its business.

CIGNA has established a Code of Ethics and Compliance, which includes policies, requirements and responsibilities. The Code of Ethics and Compliance is part of a compliance program intended to prevent and detect illegal, improper and unethical conduct by the Corporation and its subsidiaries. The Code of Ethics and Compliance is a vital component of an effective, internal business control structure. The Code of Ethics and Compliance applies to directors, officers, employees and agents of CIGNA Corporation and its subsidiaries throughout the world.

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

Any requests for a waiver to this Code of Ethics and Compliance must be in writing and addressed to the Chief Compliance Officer. When necessary, the request will be elevated to the Board of Directors. 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. Waivers will be promptly disclosed when required by applicable law.

These are the policies of the Code of Ethics and Compliance. Employees should refer to the Code of Ethics and Compliance posted on CIGNA's Intranet, for detailed requirements and responsibilities. CIGNA reserves the right to modify these policies at any time.

Understanding and Applying CIGNA's Policies

As an employee of a CIGNA company:

- You should have a general understanding of CIGNA's policies and where they may be found.
- You should learn the details of policies dealing with your organization and job responsibilities.
- If you have a concern about what is proper conduct for yourself or anyone else, you should promptly raise that concern with your manager, the Ethics Help Line (1.800.472.8348), Compliance Officer, or Legal Counsel.
- You may be required to periodically affirm your understanding of and compliance with CIGNA's policies.

Reporting Policy Violations

- If you know or reasonably suspect a violation of CIGNA's Code of Ethics and Compliance or other policies, you must report the matter. Unless a specific policy provides otherwise, your report may be oral or written, and made to:
 - Ethics Help Line on 1.800.472.8348
 - Ethics Mailbox: ethics@CIGNA.com
 - General Auditor
 - General Counsel
- If you, as a supervisor, Compliance Officer or Legal Counsel, receive such a report, you must report it to the General Auditor.
- The General Auditor and General Counsel or their designees will investigate alleged violations of the Code of Ethics and Compliance or other policies. If circumstances warrant, they may report the violation to public officials for prosecution and take action to maximize recovery of assets.
- Compliance with CIGNA's Code of Ethics and Compliance and other policies is subject to audit. The General Auditor will periodically report to the Audit Committee of the Board of Directors on compliance with the Code of Ethics and Compliance. In addition, any violation that might significantly harm CIGNA's reputation or have a material effect on its financial condition will be reported as soon as practicable.

CIGNA will not discriminate or retaliate against any person who, in good faith, reports possible violations by a CIGNA company, or by another employee or agent, of laws or regulations, the Code of Ethics and Compliance, or other CIGNA policies.

Anti-Kickback

It is CIGNA's policy to comply strictly with all laws that regulate government contracting. CIGNA Companies and their employees are prohibited from 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. To ensure compliance with this policy, contracts or other business arrangements between CIGNA and any health care provider or supplier must be in writing and must be reviewed and approved by CIGNA Legal Counsel.

Antitrust and Fair Competition

It is CIGNA's policy to strictly comply with the antitrust laws in all of its activities. The antitrust laws promote healthy competition and govern the conduct of CIGNA's businesses in setting prices and other aspects of purchasing, marketing and selling products and services. Every CIGNA employee is responsible for compliance with the antitrust laws, and for promptly reporting any possible violations of the laws to CIGNA counsel. Every effort should be made to comply with antitrust and competition laws and to exercise good business judgment in conducting CIGNA's business operations and

activities. CIGNA regards any conduct that might give rise to even a potential antitrust violation as a very serious matter.

Anti-Money Laundering and OFAC Compliance

It is CIGNA's policy to strictly comply with all laws and regulations designed to combat money laundering activity, including those rules and regulations requiring the reporting of transactions involving currency, certain monetary instruments, and suspicious activities, and to avoid transactions with Blocked Persons. Employees are expected to comply with CIGNA's policy. CIGNA regards any failure to comply with this policy or the anti-money laundering guidelines as a very serious matter. The consequences of non-compliance with this policy may include disciplinary actions, up to and including termination, as well as significant criminal and civil penalties.

Board Memberships and Officerships

CIGNA permits employees to serve as directors on boards or as officers (or other positions of responsibility) of Non-Controlled Entities and industry-related organizations after an evaluation of the benefits and risks of the opportunity. Serving as a director or officer must not involve a conflict of interest under CIGNA's Conflicts of Interest policy or interfere with the discharge of the employee's duties to CIGNA. As used in this policy, the words "director or officer" include directors on boards and officers of corporate entities, as well as similar positions of responsibility in entities using other forms of ownership, such as partnerships and limited liability companies.

Charitable Contributions

CIGNA's Civic Affairs department is the only department authorized to make or approve charitable contributions on behalf of CIGNA. This includes any contribution of CIGNA funds or assets to or for the benefit of a charity or charitable event. Company assets include property such as materials, facilities, furniture, supplies, office equipment of all kinds, telephone and mail systems, voice mail and email systems, or anything else of value. CIGNA's policy is to not donate used computers and equipment to charities.

Requests for approval of charitable contributions should be referred to the Executive Director, Civic Affairs, TL06B. Under no circumstances should employees or directors use CIGNA funds to make charitable contributions on behalf of CIGNA without approval from Civic Affairs.

Conflicts of Interest and Corporate Opportunities

It is CIGNA's policy to avoid any situation that involves, or appears to involve, a conflict between the interests of CIGNA and the interests of its employees. Conflicts of interest can arise when an employee is directly or indirectly connected with a present or potential supplier, competitor, or customer. Outside financial or business involvement by members of an employee's immediate family, or by persons with whom the employee has a close personal relationship, may create a possible conflict of interest for the employee, and are subject to the requirements of this policy.

In addition, it is CIGNA's policy to prohibit its employees and directors from:

- taking personal advantage of opportunities that are discovered through the use of corporate property, information or position;
- using corporate property, information or position for personal gain; or
- competing with CIGNA.

Personal loans to, or guarantees of obligations of directors and certain officers, made by CIGNA may also create conflicts of interest and are subject to the requirements of this policy.

Control, Accounting and Reporting

CIGNA employees are expected to comply with controls applicable to their job responsibilities. These controls could include operating and compliance controls. They could also include disclosure controls and procedures, which include established internal accounting and financial reporting controls, to ensure compliance with applicable laws and regulations governing financial, statutory and tax reporting and related matters. Employees are expected to use care and diligence to ensure that CIGNA's assets are secure; transactions are recorded completely, accurately and on a timely basis; and that internal and external reports and communications are full, fair, accurate, timely and understandable; and reported as prescribed by law, policy, or generally accepted accounting principles.

Equal Employment Opportunity, Affirmative Action and Non-Discrimination

Equal Employment Opportunity - It is CIGNA's policy to foster a positive, productive work environment that promotes equal employment opportunity and prohibits discriminatory practices. CIGNA is an equal opportunity employer. CIGNA's employment decisions are based upon an individual's qualifications, skills, and performance, without regard to race, color, sex, age, disability, veteran status, religion, national origin, ancestry, sexual orientation, gender identity, marital status, citizenship status or any characteristic protected by applicable law.

Non-Discrimination - All employment-related decisions should be made in compliance with federal, state and local laws prohibiting discrimination in employment.

Prohibition of Retaliation - Retaliation based on an employee's report or complaint of discrimination is prohibited. Employees should promptly report perceived retaliation to Your CIGNA Life Service Center at 1.800.551.3539. CIGNA will take appropriate disciplinary action against any individual who is proven to have taken adverse action against an employee on the basis of the employee's complaint or reporting of discrimination.

Affirmative Action - CIGNA locations should practice affirmative action to ensure quality of opportunity in all aspects of employment, including efforts to ensure that the candidate pool for open positions includes diverse qualified applicants. Candidates should be selected based on qualifications and skills.

External Communications

CIGNA Corporate Relations is responsible for all external communications on behalf of CIGNA that pertain to the company, its policies and practices, its business activities, or the industries and communities in which CIGNA has business activities. This includes any communication on behalf of CIGNA with the media, legislators, regulators (other than routine contact with regulators in the ordinary course of business), industry audiences, the public at large, and any other person or entity where there is a likelihood that the communication might be construed as a public statement by CIGNA.

False Claims

It is CIGNA's policy to comply strictly with all laws that regulate government contracting and to prohibit employees from knowingly submitting false, fraudulent, or misleading information in connection with goods or services reimbursable by the federal or a state government.

Gifts and Entertainment

CIGNA recognizes that business gifts and entertainment can create goodwill and sound working relationships. However, it is CIGNA's policy to prevent the use of business gifts and entertainment to improperly influence and to avoid the appearance of improper influence of employees, customers, suppliers or others doing business with CIGNA.

Permitted Gifts and Entertainment

- Employees and directors may provide or accept **ordinary** and **reasonable** business-related meals and entertainment if permitted by law and by CIGNA's Business Travel, Entertainment and Employee Related Expense policy. CIGNA's expenses must be properly recorded in the appropriate books and records. If an employee or director is providing or accepting entertainment, both the business partner and CIGNA representative must be present and business must be discussed. Otherwise, it will be considered a Gift.
- Employees and directors are permitted to give or accept gifts of small value, which would not be mistaken for anything but a sign of respect or friendship. The dollar limit is \$100. Expenses for gifts given to others must be properly recorded in the appropriate books and records.
- Managers/supervisors and their direct reports are permitted to exchange/give gifts of reasonable value that are purchased with personal funds, on special occasions such as birthdays, holidays and weddings, provided it does not improperly influence or create the appearance of influencing an employee's decisions regarding CIGNA business.

Prohibited Gifts and Entertainment

- Employees and directors must not offer or give gifts, entertainment or anything of value that would, or might appear to, improperly influence the business decisions of others. Gifts, entertainment or other benefits of value must not be given if doing so is prohibited by law or otherwise prohibited by company policy.
- Employees and directors must not accept gifts or entertainment that would, or might appear to, improperly influence the employee's/director's decisions regarding CIGNA

business. Awards, promotional items or recognition conferred to employees under a CIGNA-sponsored program are not considered gifts.

- Employees and directors must not give or accept money or gift certificates to/from anyone doing business with CIGNA or contemplating doing business with CIGNA, under any circumstances.
- Employees and directors must not solicit gifts or entertainment.
- Providing gifts and entertainment to officials and employees of any government is highly regulated and often prohibited. Employees and directors must not provide such gifts or entertainment unless they determine, after consultation with legal counsel, that such gifts and entertainment are permitted by applicable laws and regulations. See CIGNA's policies on Political Contributions, Government Contacts, Lobbying, and Grassroots Activities and International Business.
- Some states have laws which, in certain circumstances, impose stricter standards. This includes state anti-rebate laws (where gifts and entertainment relate to customers) and state procurement laws (where government entities are customers). Business counsel is responsible for providing advice regarding these requirements.
- Some customers, brokers, vendors or employers may also have policies on Gifts and Entertainment. No CIGNA employee should offer or accept gifts or entertainment that knowingly would cause another to violate such policies.
- Friends and family members of an employee or director must not give or accept prohibited gifts or entertainment where it may appear that the employee or director is the intended recipient or giver.
- Employees and directors are not permitted to make a gift or provide entertainment that benefits a party indirectly, such as a gift to the person's family or an organization in which the person has a personal interest.

Harassment

It is CIGNA's policy that all employees, customers, contractors, vendors, and visitors to the workplace enjoy a positive, productive, and respectful environment that is free of harassment. Harassment, whether verbal, physical or related to the work environment, is unacceptable in CIGNA's offices and other work settings, such as business trips and CIGNA-sponsored social events. Harassment by telephone, email, voice mail or other means of communication is prohibited and will be handled in the same manner as face-to-face harassment.

CIGNA encourages the reporting of all incidents of harassment, regardless of who the offender may be. Retaliation against any employee, customer, contractor, vendor, or visitor who, in good faith, alleges harassment will not be tolerated.

All complaints of harassment or retaliation will be investigated and appropriate disciplinary action, up to and including termination, will be taken.

Information Protection

It is CIGNA's policy to protect its information assets from accidental or unauthorized modification, destruction and/or disclosure.

The Information Protection Policy and Standards outline the safeguards and define the activities required to protect CIGNA's information assets from accidental or unauthorized modification, destruction and/or disclosure in order to enhance the confidence of customers and business partners, protect trade secrets and confidential information, and reduce exposure to business and legal liabilities.

The Information Protection Policy and Standards apply to:

- all CIGNA information, in all of its forms, regardless of where it resides, who possesses it, or the technology used to create, store, transmit or use it;
- all computer and network systems owned and/or administered by CIGNA;
- all CIGNA business units, including those of CIGNA's subsidiaries; and
- all employees, contractors, consultants, and vendors at CIGNA, including those individuals affiliated with third parties who access CIGNA Information Systems. Throughout the Information Protection Policy and Standards, all such individuals are referred to as "users" or "information users."

All information users are responsible for protecting CIGNA's information assets and must follow the requirements provided by the CIGNA Information Protection Policy and Standards, which include:

1. complying with CIGNA's Information Protection Policy;
2. protecting paper documents;
3. attending to your workstation;
4. managing passwords;
5. securing software;
6. backing up critical data; and
7. using CIGNA's networks safely and responsibly.

Intellectual Property

CIGNA owns all innovations, which include, among other things, ideas, inventions, discoveries and improvements conceived, created, made or discovered by its employees while employed by a CIGNA company, if they relate or pertain in any way to CIGNA's business. This includes innovations made by employees working alone or with others. All innovations conceived of or made by an employee will be deemed to have been made in the course of employment unless the innovations: 1) were developed on the employee's own time; 2) outside the employee's regular or assigned duties for CIGNA; and 3) no CIGNA equipment, facility, or proprietary information of CIGNA was used.

CIGNA's policy is to take necessary steps to secure and protect its rights in its intellectual property, including innovations developed by employees, and to secure and protect proprietary information entrusted to it by others.

CIGNA's policy is to protect intellectual property from illegal use or other misuse by ensuring it is affixed with or identified by "Confidential" notices, trademark, service mark or copyright symbols and by avoiding any inappropriate or unauthorized disclosures.

International Business

The policies contained in CIGNA's Code of Ethics and Compliance apply to all CIGNA-controlled entities, regardless of geographic location or the countries where they conduct business.

CIGNA's policy is to comply with all applicable US laws and regulations regarding the conduct of international business and will implement programs to assure compliance with US laws and regulations governing international business and transactions. These laws include, but are not limited to, the Foreign Corrupt Practices Act, anti-boycott laws, and anti-money laundering laws. Business and function leads are responsible for understanding the US laws and regulations, determining applicability, and developing and implementing appropriate policies and procedures to ensure compliance with such laws and regulations.

CIGNA's policy is to comply with all applicable local laws and regulations regarding the conduct of business in the countries where it conducts business. The Chief Executive Officers or equivalents of the non-US subsidiaries or affiliates are responsible for understanding the US and local laws and regulations, determining applicability, and developing and implementing appropriate policies and procedures to ensure compliance with such laws and regulations.

Political Contributions, Government Contacts, Lobbying and Grassroots Activities

General - It is CIGNA's policy to obey all laws in promoting its positions to government authorities and making political contributions. CIGNA encourages employees to participate in the political process as private citizens by registering to vote and staying abreast of the issues.

Political Contributions - CIGNA's political action committee, CIGNA PAC, makes all US political contributions on behalf of CIGNA's business interests. In rare circumstances, political contributions are made by CIGNA Corporation and/or its subsidiaries—exclusive of CIGNA PAC—with the prior approval of the General Counsel and the Chief Executive Officer.

CIGNA PAC is funded by the voluntary contributions of eligible employees. Consistent with federal regulation, only eligible employees are asked to consider supporting CIGNA PAC.

Legislators or candidates for elective office may be invited to visit corporate facilities to meet employees only after the General Counsel or the General Counsel's designee has determined in advance that the visit complies with applicable law and CIGNA's policies and strategy.

Government Contacts and Lobbying - CIGNA Government Relations, which includes the Federal Affairs and State Government Affairs departments, in cooperation with CIGNA's Legal Department, is responsible for all government contacts on behalf of CIGNA. Such contacts include spoken and written comments presented on behalf of CIGNA, including personal conversation, letters, post cards, telephone calls and/or emails to any foreign or domestic government officials. This also specifically refers to the presentation of testimony and information, handling requests for assistance by government officials, and any form of advocacy or lobbying for industry or public issues of interest to CIGNA. Lobbying activities must comply with all federal and state laws and regulations. All government contacts must be reviewed in advance by CIGNA Government Relations.

Grassroots and Political Advocacy - CIGNA Government Relations may ask employees, customers and others to contact state or federal legislators regarding issues important to CIGNA. Such requests generally will include background information about the issue, its importance to the business and a suggested message to legislators, but any contacts are strictly voluntary.

Service as an Elected or Appointed Government Official - CIGNA will not ask an employee to seek or serve in an elected or appointed government position. However, an employee may serve in such a post where such service is permitted under the CIGNA's Conflicts of Interest policy.

Privacy

It is CIGNA's policy to protect the privacy of past, present and prospective customers, members, plan participants, policyholders, insureds, and its employees and other similar parties, consistent with CIGNA's Privacy Principle and applicable law.

CIGNA's Privacy Principle: All individually identifiable personal information will be collected only as reasonably necessary for the conduct of CIGNA's business. Individually identifiable personal information will not be disclosed to non-CIGNA parties except (i) when released upon consent of the subject of the individually identifiable personal information or (ii) if disclosure is otherwise allowed by law and generally consistent with the purpose for collecting the individually identifiable personal information. CIGNA will not sell, rent or license to a non-CIGNA party individually identifiable personal information unless (i) authorized by the subject of the individually identifiable personal information or (ii) in countries outside the United States, allowed by law and approved by the Privacy Council.

CIGNA may de-identify individually identifiable personal information and use the de-identified information for predictive modeling, forecasting, analysis, scientific and other purposes as allowed by law.

Individually identifiable personal information may be shared with non-CIGNA parties that are participating with CIGNA in merger, acquisition or divestiture activities and who agree to abide by the CIGNA Privacy Principle. CIGNA may also, if required by court order, or otherwise required by law, or to prevent fraud: collect, use or disclose individually identifiable personal information (for example, investigations conducted by law enforcement).

In addition to the requirements set forth in this policy, the CIGNA Information Protection Policy and Standards provide detailed requirements for protecting CIGNA's information and must be followed by CIGNA's employees, contractors, consultants, vendors and other users of CIGNA's information.

Purchasing

Only the Vice President (VP) of CIGNA Corporate Services/Purchasing can commit CIGNA to purchasing goods and services within the scope of this policy ("Goods and Services"). The VP has delegated authority to CIGNA Corporate Services/Purchasing to establish and manage purchasing, sourcing and contracting activities for goods and services on behalf of CIGNA.

CIGNA Corporate Services/Purchasing develops purchasing procedures that must be followed by all CIGNA employees when sourcing, contracting for or purchasing goods and services. CIGNA employees shall purchase goods and services through the purchasing procedures and shall not contract or negotiate price, terms or conditions or otherwise give verbal/written notice to commit or engage suppliers to deliver goods or perform services except as prescribed by this policy.

CIGNA's policy is to solicit competitive bids to obtain the best value when purchasing goods and services. CIGNA Corporate Services/Purchasing shall evaluate suppliers with regard to best value with a particular emphasis on quality, total cost, delivery, innovation and management expertise to meet CIGNA's requirements.

Records Management

It is CIGNA's policy to effectively maintain records in compliance with all legal, regulatory and business requirements. Records include recorded information on all media and formats (including but not limited to paper, microfilm, voice and email, electronic databases and electronic documents). All records created in the course of business are the property of CIGNA, regardless of whether or not the content relates to CIGNA business and may be accessed by CIGNA without notifying directors, employees or agents.

Unauthorized disposal or removal of records from CIGNA is prohibited. It is unlawful and prohibited by this policy to knowingly remove, alter, destroy, mutilate, delete, conceal, cover up, falsify or make a false entry in any record, document or tangible object with the intent to impede, obstruct, or influence an investigation or audit, or any civil or criminal litigation, or the proper administration of any matter within the jurisdiction of any governmental department or agency, or in relation to or contemplation of any such investigation, audit, litigation or matter.

Risk Management

The Corporate Risk Management organization is responsible for developing and managing worldwide enterprise risk management, employee safety and security, loss prevention, claims management, and environmental compliance and activities for CIGNA and its subsidiaries.

Businesses and functions are not permitted to establish risk management programs or purchase insurance without the prior approval of the corporate risk management organization. This policy does not apply to the purchase of reinsurance by CIGNA's insurance operating units as part of their normal business operations.

All businesses and functions are required to follow the loss prevention and safety standards developed or approved by Corporate Risk Management.

Securities Transactions and Insider Trading

CIGNA prohibits insider trading, tipping, and the misuse of material non-public information. Insider trading generally involves buying or selling securities while aware of material non-public information. Tipping generally involves disclosing material non-public information, often to a relative, colleague or friend, enabling the recipient of the material non-public information to buy or sell securities on the basis of the material non-public information, or to tip another person.

This policy applies both to material non-public information about CIGNA and to material non-public information learned in the course of your employment about other companies. This policy applies to securities transactions by directors, employees and agents, members of their immediate family and persons sharing their homes, whether the transactions are on behalf of CIGNA, an individual's own account, or otherwise.

CIGNA prohibits speculating in CIGNA securities or CIGNA-sponsored securities. Speculating includes buying or selling any put or call options or selling short, even if the director, employee, or agent is not aware of material non-public information.

CIGNA prohibits Restricted Persons, members of their immediate family and persons who share their homes from committing to any transactions involving a CIGNA security or a CIGNA-sponsored security during designated trading blackout periods. Restricted Persons include the directors and those employees who, by virtue of their positions, may have access to material non-public information. The CIGNA Corporate Secretary notifies individuals who are Restricted Persons. In addition to the restrictions on Restricted Persons during blackout periods, certain Restricted Persons who are executives will not be permitted to trade in CIGNA securities without receiving clearance from the CIGNA Corporate Secretary.

"Market timing" is a pattern of frequent transfers in and out of investment funds. Market timing is inappropriate when it negatively affects other Plan participants or fund investors. CIGNA prohibits market timing in any of its qualified plans. CIGNA reserves the right to monitor employees' investment fund transfer activities to determine whether there are any inappropriate market timing activities and to restrict his or her ability to make investment transfers in or out of particular funds.

Trade Practices

It is CIGNA's policy to comply with all laws, rules and regulations applicable to CIGNA's products and services.

As an employee of a CIGNA company:

- You should not violate any laws or regulations, including trade or insurance practices laws.
- You should consult with legal counsel or your business/function compliance officer about any activities that may be contrary to CIGNA's contractual commitments.
- You should not engage in any sales practice that is intended to mislead a customer or vendor or misrepresent CIGNA or its products or services.
- You should sell CIGNA's products and services based on their merits, not by disparaging the products and services of competitors. Any comparisons to competitors' products and services must be supported by facts.
- You should not offer gifts, entertainment or favors to CIGNA's customers' employees or representatives that induce them to place their personal interests above those of the organizations they represent.

Use of CIGNA Assets

It is CIGNA's policy that company assets be adequately protected from loss, damage or misuse. Company assets include property such as materials, facilities, furniture, supplies, office equipment of all kinds, telephone and mail systems, voice mail and email systems, computers, computer networks, software, and information relating to the company, the products and services it provides, and its customers. Assets also include any documents or records that have financial value such as currency, checks, vouchers, credit or other charge cards, receivables, payables, records of time worked, expense reimbursements or invoices.

As an employee of a CIGNA company:

- You should safeguard all company assets from theft, improper use, damage or sabotage and you should comply with all policies and procedures designed for their protection.
- Use of company electronic information and technical resources is covered in CIGNA's policy on Information Protection. You should not use other company assets for personal or other outside activities without authorization from your supervisor and legal counsel.

Use of CIGNA Names and Logos

The Corporate Advertising and Branding organization is responsible for developing and managing worldwide advertising and corporate identification programs to ensure a consistent brand position. The Corporate Advertising and Branding organization, with support from legal counsel, is responsible for developing standards for all references to CIGNA and/or its subsidiaries and affiliates in advertising, promotional materials, stationery, and other forms of communications media used externally. These standards address CIGNA names, logos, and other organizational identifiers.

Letterhead, business cards and other forms of identification containing the words "CIGNA Corporation" should only be used by CIGNA Corporation employees whose principal office is in a jurisdiction in which CIGNA Corporation is legally qualified to

conduct business. CIGNA Corporation is a Delaware corporation and is qualified to conduct business in Connecticut, New York, Pennsylvania and the District of Columbia. Even in the legally qualified jurisdictions, stationery and forms containing the words "CIGNA Corporation" should not be used in letters or other documents for the solicitation, sale or provision of any insurance or other products or services to customers or the public generally.

Letterhead, business cards and other business forms for CIGNA Corporation are to be used only by officers and employees of the parent company when conducting the business of the parent company. CIGNA Corporation letterhead may not be used to conduct the business of subsidiary companies or affiliates.