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aetna®

Code of Conduct



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Message from CEO and President

Dear Colleague:

Aetna's reputation as an industry leader depends on our ability to deliver on our promises. For more than 160 years, we have been guided by the highest standards of integrity. Our relationships with our customers, business partners and suppliers are built on trust earned over time and through experience. Each day we must remember our commitment to do the right thing for the right reason and keep the people we serve at the center of everything we do. When we act with integrity, we are living The Aetna Way.

Our Code of Conduct is grounded in and reflects the principles at the heart of The Aetna Way. The Code guides our compliance with the rules and regulations that govern our business throughout the world. If we apply this Code to all aspects of our business, we will fulfill our promise to operate in accordance with the law, company policies and our core values.

Although the Code can't cover every imaginable situation, it does provide you with examples of everyday situations to assist you in resolving potential problems and general guidance for performing your job responsibilities with integrity and in concert with our culture and beliefs. Also included is a list of contacts for you to use in seeking advice or reporting concerns.

Ultimately, our reputation depends on the sound judgment and personal integrity of every Aetna employee, regardless of your level in the organization. If you are ever in doubt as to the right course of action, use The Aetna Way and our **Ethical Decision-Making Framework** to help you make the right decisions. If you ever have reason to believe that a legal or ethical violation has occurred, you need to report it immediately. Your manager is the first person you should consider speaking with. But there are other resources available, including Human Resources, Compliance, the Law Department, Corporate Security, Investigative Services or the confidential Aetna AlertLine®. Our policies forbid any form of intimidation or retaliation against you for fulfilling this obligation.

I expect each of you to read, understand and follow our Code of Conduct. Please consult it throughout the year, as needed. Your commitment to compliance, all company policies, and the laws and regulations applicable to our businesses contributes directly to our success as a company. Please join me in living our commitment to protecting and strengthening Aetna's reputation for integrity and keeping our promises to each other and those we serve.



Mark T. Bertolini



“We have served our customers for more than 160 years, consistently guided by the highest standards of integrity.”

– Mark T. Bertolini

1. Introduction

We make good on our promises because, quite simply, it is The Aetna Way. Each of us must be committed to the highest standards of business conduct.

For over 160 years, Aetna has had a reputation for integrity and reliability. We have earned this reputation by consistently delivering on our promises to our constituents. Constituents are more than just our customers. We use the term constituents to identify all of the groups that we serve and interact with: members, customers, regulators, providers, shareholders, producers, suppliers and other business partners, our employees and the communities where we work and live.

We make good on our promises because, quite simply, it is The Aetna Way. Each of us must be committed to the highest standards of business conduct. We require all employees, officers, directors and our business partners to understand and follow these high standards while doing their jobs for Aetna.

Our company and the insurance industry have undergone many changes since Aetna was founded. Yet our Code of Conduct still reflects many of the same values and standards contained in our very first statement of principles, released more than 50 years ago. While this Code does not address all ethical and compliance concerns that you may face during your employment at Aetna, you should consider it — and use it as — your primary source of information. Whenever you need help, ask for guidance from any of the contacts listed on the Resources page at the end of this Code.

Times may change, but our commitment to this Code and to doing the right thing remains strong. Day in and day out, we must strive to earn the trust of the people we serve.

Innovation with Integrity

Our customers count on us to provide high-quality products and services that meet their changing needs. Aetna's innovations and ethical business practices have made us a recognized leader in the healthcare industry.

- We offered our first accident policies before the turn of the 20th Century, and followed soon after with health and auto insurance.
- We hired our first female employee in 1906, and appointed our first female officer in 1926. Today more than two-thirds of our employees are women.
- We issued our first statement of principles in 1958.
- We have been committed to philanthropy and socially responsible business for decades. Since 1980, Aetna and the Aetna Foundation have contributed over \$445 million in grants, sponsorships and social investments.
- We became an international company in 1966, and we now serve members in more than 180 countries around the globe.

If you become aware of a violation of this Code, the law or our policies, you have an obligation to report it immediately.



About this Code of Conduct

Our Code of Conduct outlines the values and standards that guide our business practices and day-to-day actions. By putting these principles and guidelines into action, we maintain our reputation for delivering on our promises to all our constituents.

Aetna’s employees, officers, directors and business partners are expected to carry out their Aetna responsibilities in compliance with this Code of Conduct, applicable laws and regulations, and company policies.

If you become aware of a violation of this Code, the law or our policies, you have an obligation to report it right away. If you are ever in doubt about the right thing to do in conducting Aetna business, ask for help.

You can access the Code of Conduct on our public website at <http://www.aetna.com/investors-aetna/assets/documents/code-of-conduct.pdf>. Any changes to the Code will be put on our public website within four business days after the change is made.



Business decisions can be complex; the right course of action is not always clear. Ask for help.

Our Guide to Ethical Decisions

Making decisions that support our principles can be challenging. At times, it may feel as though our constituents have competing interests. Yet, all of these people share the desire to build trusting, value-added relationships. Therefore, **The Aetna Way** should guide us when conducting Aetna’s business.

The Aetna Way means that you:

Are clear, open, and honest:

- Make what you know accessible to others.
- Deliver bad news early and personally.
- Raise concerns and problems.

Keep promises:

- Hold yourself and others accountable for targets and deadlines.
- Do what you say you will do.
- Take responsibility for correcting your mistakes and do all you can to fix them.

Are fair in your dealings with others:

- Express differences of opinion with others in a respectful manner.
- Assume positive intent.
- Strive for a win-win outcome with customers, clients, employees, colleagues, providers, suppliers.

Uphold our legal obligations:

- Comply with all applicable laws and regulations.
- Honor contractual obligations.

Our ethical decision-making framework

Business decisions can be complex; the right course of action is not always clear. When faced with business decisions that may affect Aetna's reputation for honesty, and integrity, we use a six-question framework as a guide.

Involve the right people in considering the following questions:¹

1. Should I be troubled by this? Is this consistent with Aetna's commitment to integrity?

Is it really an issue? Am I genuinely perplexed, or am I afraid to do what is right?

2. Who will be affected by my decisions? How will they be affected?

Who may be affected by my decisions? Another department, members, customers, providers? What will be the impact if I act, or decide not to act? Consider the Golden Rule (Treat others as you would like to be treated).

3. What's my responsibility to act? What will happen if I don't act?

Have I caused the problem, or has someone else? How far should I go in resolving the issue? How serious a problem is it? If it is not my problem, will someone else take action if I don't?

4. What are the ethical considerations?

Is it a question of legal obligations, fairness, promise keeping, honesty, doing good, or avoiding harm?

5. Who needs to be involved in making this decision?

Should I consult with my manager, Business Compliance Officer, internal legal counsel or the HR Contact Center? If I am reluctant to raise this issue, should I call AlertLine®?

6. Am I being true to myself and The Aetna Way? How would my actions appear to customers or the public?

What kind of person or company would do what I am contemplating? Have I made the right decision for the right reason? Would I be proud to share my decision with my family? With coworkers? With regulators or public officials? How would I feel if it were reported on the front page of the newspaper?

Your Responsibilities

As an employee, officer or director of Aetna, you must read this entire Code of Conduct. If you have any questions about its contents or how it applies to your job, speak to your manager or one of the contacts listed on the Resources page at the end of the Code.

Each year, you will be asked to:

- Complete a **Code of Conduct Acknowledgment Form** to confirm that you have read and understand this Code and comply with it and other key Aetna policies.
- Disclose any possible conflicts of interests.
- Raise concerns you may have about possible Code violations.

Circumstances can change over the course of the year. If a new situation introduces a real or apparent conflict of interests, discuss it with your manager or **Business Compliance Officer** right away. You may need to update the disclosure on your **Code of Conduct Acknowledgment Form**.

Reporting your concerns

Any time you observe or suspect a violation of this Code, the law, or our policies, you are obligated to report it. If you aren't sure about the right course of action, you should ask for help from any of these resources:

- Your manager knows you and your job and can often apply his or her business experience to help you make the right decision.
- Our Human Resources staff can help with workplace and employment issues.
- Your Business Compliance Officer or internal legal counsel can help with concerns or issues related to business conduct, integrity or compliance.
- See the Aetna Compliance & Regulatory Affairs intranet website for a list of Aetna's **Business Compliance Officers**.
- For a list of Aetna lawyers by specialty, visit **LawNet**.

You can also ask for help or report a violation or problem by contacting the Aetna **AlertLine**®. It is open around the clock every day of the year and you can make your report anonymously.

By Telephone:

- In the U.S. call toll-free at **1-888-891-8910**.
- Outside the U.S., dial the AT&T Direct access code for the country you are calling from followed by **1-888-891-8910**. Find AT&T Direct access codes at <http://www.att.com/esupport/traveler.jsp> or by contacting your local operator. Or, via the Internet at <https://aetna.alertline.com>.

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You may also write to Compliance & Regulatory Affairs, the Lead Director of the Board of Directors, or the Audit Committee of the Board of Directors at P.O. Box 370205, West Hartford, CT 06137-0205 USA.

The Audit Committee of our Board of Directors or the Chairman of the Audit Committee, and the Chief Ethics and Compliance Officer, or Deputy Chief Compliance Officer, will review complaints or concerns involving or touching on our accounting, internal accounting controls or auditing matters in accordance with the procedures established by the Audit Committee. All other complaints, including Compliance and Ethics concerns, will be reviewed or investigated and addressed by legal and compliance personnel in a timely manner.

Our contracted providers and suppliers can use these same resources to report possible violations or business conduct and integrity concerns.

Directors should raise issues and seek guidance from Aetna's Corporate Secretary or General Counsel.

The Aetna AlertLine® is open around the clock every day of the year and you can make your report anonymously.

Confidentiality and non-retaliation policy

In some situations, you may be reluctant to report a violation of this Code. Rest assured that reports are welcomed and encouraged. Reporting your concerns reflects our collective commitment to open, honest communication.

We will do our best to guard your privacy if you report a violation, raise a concern or are involved in a complaint or investigation. Aetna takes all reports seriously. If a violation is found, appropriate corrective actions will be taken, including disciplining those involved.

Aetna prohibits intimidating or retaliating against anyone who in good faith:

- Makes a complaint or reports a violation to Aetna or any law enforcement or government agency.
- Cooperates or helps with a government or internal investigation.
- Conducts self-evaluations, audits, remedial actions or other activities in support of our compliance program.
- Provides information to the government or Aetna about a breach of law or Aetna policy.

If you feel that you have been intimidated or retaliated against for reporting a concern, you should report the suspected intimidation or retaliation immediately by contacting the Aetna AlertLine. It is open around the clock, every day of the year and you can make your report anonymously.

By Telephone:

- In the U.S. call toll-free at 1-888-891-8910.
- Outside the U.S., dial the AT&T Direct access code for the country you are calling from followed by 1-888-891-8910. Find AT&T Direct access codes at <http://www.att.com/esupport/traveler.jsp> or by contacting your local operator.

Or, via the Internet at <https://aetna.alertline.com>.

If you report concerns about fraud, waste or abuse, or if you raise issues concerning potential false or fraudulent claims for payment submitted to a government entity or agency, you may also have the right to employment protections under applicable laws. Your **Business Compliance Officer** or **internal legal counsel** can explain more about these laws and ways to detect and prevent fraud, waste and abuse.

Disciplinary action

Whether you are an employee, manager, supervisor or officer, you may be disciplined or lose your job, if you:

- Do not follow this Code or other Aetna policies.
- Break any laws or regulations that apply to Aetna.
- Tell an employee to violate the Code, an Aetna policy, a law or a regulation.
- Fail to share information, or provide false information in connection with an investigation, about a violation of the Code, a law or a regulation.
- Intimidate or retaliate against an employee who reports a suspected violation — regardless of whether the report is made within Aetna or to an outside law enforcement or government agency — or who cooperates or helps with an investigation.
- Neglect to address or report a violation of the Code, or a law or regulation, committed by someone you manage. See the Workplace Policies section in **AccessHR** for more information.





Q&A

I know of a situation that may violate our Code. Should I report it even if I am not completely sure there is a problem?

Yes. You are responsible for reporting possible violations immediately. Report it to your manager or **Business Compliance Officer**, or call **AlertLine**. Your report will be taken seriously and investigated. It is better to report a suspicion that turns out not to be an issue than to ignore a possible violation.

As a manager, what should I do when an employee raises a concern?

When an employee raises a concern or asks for help, managers should remain objective, open and responsive. Don't think of a report as "bad news;" consider it a positive sign of employee commitment to doing the right thing. Be sure to report any compliance or business conduct and integrity issue right away to your **Business Compliance Officer** or **internal legal counsel**.

My manager is aware of a potential violation of our Code of Conduct, but is not taking any action. What other options do I have to address the problem?

You may speak with your **Business Compliance Officer**, call **AlertLine**, or speak to your local Human Resources representative, **internal legal counsel**, or to Compliance & Regulatory Affairs via the **AETNA COMPLIANCE** mailbox.

2. Our Promises to the Company

All of our business decisions must be made in Aetna's best interest.

Avoiding Conflicts of Interests

When making business decisions, we must always consider what's in Aetna's best interest. A conflict of interests may exist if your personal interests, activities, or relationships make it hard to perform your duties for Aetna objectively and effectively. Even the appearance of a conflict of interests may damage Aetna's reputation.

We expect our employees, officers and directors to avoid real or apparent conflicts of interests.

Examples of conflicts of interests

You may have a conflict of interests if you, a family member, or a member of your household:

- Has a financial interest in any business, nonprofit, or government entity that is a customer or supplier, or that otherwise does business with Aetna, or is one of Aetna's competitors.
- Performs work (as an employee, officer, director, consultant or agent) for any of the above entities.
- Works, or serves as an officer, director or advisor, for a nonprofit or political organization with interests that intersect with Aetna's businesses or with our position on a public policy.
- Benefits personally from opportunities or resources that came to you as a result of your work at Aetna.
- Uses company time or assets for personal use or outside activities.
- Has an outside job or interest that interferes with your ability to do your job.
- Acquires a significant ownership interest (more than one-tenth of 1%) in any business other than a privately held family business.
- Works for or manages (directly or indirectly) someone with whom there is a close personal relationship (e.g., spouse, family member, close friend or significant other).

If you believe you have an actual or possible conflict of interests, report it to your manager and seek guidance from your **Business Compliance Officer** to determine whether you should report the situation by updating your online **Code of Conduct Acknowledgment Form** with the information. Your disclosure will be reviewed by Compliance & Regulatory Affairs, and you will receive appropriate guidance.

Directors should report possible conflicts to the Corporate Secretary or General Counsel. They will consult with the Chairman of the Board, the Nominating and Corporate Governance Committee, or other members of the Board of Directors, as appropriate.

No employee may assume a position as a director, officer or related position with a for-profit business without prior approval. Before seeking or accepting such a position, you must report the proposed affiliation to Compliance & Regulatory Affairs.

As a Director, you may have a conflict of interests if you, a family member, or a member of your household:

- Takes an action or has an interest that makes it hard to perform your duties for Aetna objectively and effectively.
- Receives improper personal benefits because of the Aetna board position.

To avoid director conflicts of interests, Aetna does not allow:

- Outside directors to have a direct economic relationship with Aetna unless it is approved by the Board of Directors.
- Aetna loans to directors or their family members.
- Aetna guarantees of obligations of directors or their family members.

The Nominating and Corporate Governance Committee of the Board must review for possible conflict situations such as:

- Any proposed director or other affiliation with a for-profit organization.
- Any proposed transaction involving Aetna or an Aetna subsidiary where a director has a direct or indirect material interest.

Disclosure to customers

Working with brokers and other producers may lead to situations that could create real or apparent conflicts of interests. We believe it is best for our customers, producers and Aetna when our customers understand our financial arrangements with producers. Follow Aetna's rules for disclosing relationships with producers. Refer to the **Policy on Producer Compensation** and ask your **Business Compliance Officer** or **internal legal counsel** if you have questions.

Loans and guarantees of obligations

Aetna may not make loans to, or guarantees of obligations of, directors, executive officers and their families.

Loans to, or guarantees of obligations by Aetna of, other officers and employees may create conflicts of interests. They must be approved in advance by the Chairman or someone appointed by the Chairman.

Q&A

My uncle owns a maintenance company that does excellent work at a very fair price. May I recommend his company to work for Aetna?

You may recommend that your relative's company be considered, but you must disclose your relationship at the time you make the recommendation. Normal bidding procedures must be followed. If your job would involve negotiating or administering the contract involving your relative, you may not recommend him or use your influence to have his company chosen for a job; nor may you be involved in any way in the negotiation process.

My wife is an employee benefits manager for an Aetna customer. I am a customer service representative at Aetna. Is this a conflict of interests?

It could be. Report the relationship to your manager and **Business Compliance Officer**. To avoid the appearance of a conflict, you should not be involved in matters related to your wife's company, and you should never discuss Aetna confidential information with your wife.

I am a claims processor. I have a job offer to help a health care provider keep records on weekends. Can I accept the job?

Since you process claims for Aetna and your weekend work may include submitting claims or handling claim files, there is a good chance of a real or apparent conflict of interests. Report the job offer to your manager and **Business Compliance Officer**.

Even if it is determined that accepting the outside position is not prohibited, you should consult with **Compliance & Regulatory Affairs** to avoid even the appearance of a conflict of interests. Compliance & Regulatory Affairs will share appropriate guidelines to help you out. And, if you do accept the position, you also should enter this information in your online **Code of Conduct Acknowledgment Form**.

Gifts, Hospitality and Entertainment

Giving and receiving gifts

Giving and receiving business gifts have long been considered part of good business etiquette. Of course, we want to project a positive image in the marketplace. However, we also need to make sure that our decisions are not influenced by favoritism or other inappropriate motives.

Never give or take a gift that could be perceived as a bribe or an attempt to influence business decisions. Bribery is illegal and prohibited by Aetna policy. See the "Bribes and other illegal payments" section of this Code for more details.

The safest course of action is not to give or receive any gifts at all. However, circumstances may arise where that's not possible. If you must give or receive a gift, inexpensive or promotional items are appropriate if the item is widely available to others and if the exchange is legal. Even inexpensive gifts should not be given or accepted if they are intended as, or could be perceived to be, a bribe or an attempt to influence business decisions. Ask your Business Compliance Officer for help any time you are unsure about giving or receiving a gift.

Generally, gifts valued at more than \$25.00 to or from one person are not appropriate. Group gifts — those meant for, or received on behalf of, multiple people, e.g., a unit, office, department, etc.—can exceed this limit, but must be reasonable in relation to the size of the group and purpose for the gift. Also, we cannot accept or give gifts of cash or cash equivalents, such as non merchant-specific gift certificates or gift cards (e.g., VISA® or American Express®) regardless of the amount. If you are offered or receive an expensive or inappropriate gift, politely refuse by explaining Aetna's policy on accepting gifts.

Any gifts given must be accurately and fully disclosed in the appropriate expense report with enough detail to reflect the true nature of the expense and the full names and business affiliations of those involved.

If you use an Aetna supplier or contractor for personal purposes, you must pay full market value for the services and materials. You may not accept discounts or preferential treatment offered to you because of your position at Aetna unless the same treatment is offered openly to all Aetna employees.

Special rules apply to exchange of gifts, travel and entertainment with government employees and public officials. These rules are very restrictive and are explained more fully in the Government Contracts section of this Code.

Even inexpensive gifts should not be accepted if they might be seen as a bribe or an attempt to influence business decisions.



Examples of Business Gifts

Generally Acceptable	Generally Not Acceptable
Logo mugs, t-shirts, pens, calendars	Jackets, wristwatches, electronics, jewelry
Flowers or gift baskets to be shared with other employees	\$50 bottle of wine
A \$25 gift certificate to a local restaurant	A \$50 gift certificate to a local restaurant
A \$25 merchant-specific gift card, such as: <ul style="list-style-type: none"> • Macy's® Stores • Barnes & Noble Books • Godiva® Chocolates 	Any non merchant-specific gift card, such as: <ul style="list-style-type: none"> • VISA • American Express • Amazon.com®

Business hospitality, entertainment, travel and meals

Aetna pays your travel and related expenses, as permitted by Aetna's **Travel and Entertainment Reimbursement Policy**. In general, others should not pay for these costs.

You may occasionally offer or accept meals or entertainment offered in conjunction with meetings to discuss Aetna business. At least one Aetna employee must be present at each such event. Lavish, expensive, or exclusive meals and entertainment are not acceptable because they may be perceived by others as a bribe or an attempt to influence business decisions. Consult with your **Business Compliance Officer** if you have questions.

Aetna will pay for business-related hospitality offered to others if permitted by Aetna's policies, and anti-bribery or other laws. Refer to **Aetna's Foreign Corrupt Practices Act (FCPA) and Other Anti-Corruption Laws Compliance Policy** for additional guidance. Any such expenses must be recorded accurately and with enough detail to reflect the true nature of the expense and the full names and business affiliations of those involved.

Examples of Business Hospitality and Entertainment

Generally Acceptable	Generally Not Acceptable
Inexpensive general admission tickets to regular season sporting events	Expensive, hard to obtain tickets to playoff tournaments or series
A round of golf with a business associate	All expenses paid vacation at a golf resort
Travel expenses in connection with a speaking engagement	A week-long trip for a two-day business meeting or presentation
Sharing a taxi to a trade show	Using a supplier's ski chalet for the weekend
Dinner and a show provided to all presenters at a conference	Tickets to the theater for you and your partner

On occasion, it may be acceptable to host or attend a celebratory dinner or function with business associates to mark the end of a project or a deal; however, the celebration must be a one-time event, reasonable and appropriate to the occasion and occur shortly after the project or deal concludes. For example, it would be acceptable for Aetna personnel to attend a celebratory dinner sponsored by a business partner two weeks after the successful completion of a project or transaction.

Special rules apply to exchange of gifts, travel and entertainment with government employees and public officials. These rules are very restrictive and are explained more fully in the "Government Contracts" section of this Code.



Honoraria and fees from others

Our employees may be asked to participate in professional activities, professional forums or surveys that are related to Aetna or our business interests. For example, you may be asked to serve on a committee or make a speech. You may not be paid a fee (often referred to as an honorarium) for this work. In general, you may accept an offer to cover reasonable travel and lodging costs as long as other committee members or speakers who are not Aetna employees are treated equally.

Never give or take a gift that could be perceived as a bribe or an attempt to influence business decisions. Even inexpensive gifts should not be given or accepted if they may appear to be an attempt to influence business decisions.

Q&A

May I give a supplier a gift basket with fruit and cookies to celebrate the end of a project?

The best approach is to give no gift at all. If business custom and the circumstances are such that you feel you must give a gift, be sure it's just a token (i.e., something with a value less than \$25). You may give this type of gift so long as giving it does not violate any laws or policies, including the policies of the supplier's company. You should get approval for this gift from your manager before you present it. Be sure that its expense is disclosed accurately and fully in your expense report.

At a business meeting in India, a local representative presented me with an expensive gift. Our local service provider told me it was customary to accept such a gift and that refusal would insult the presenter. What should I do?

It would be unusual in most locations for an expensive gift to be offered. But, if that should happen, your best course of action would be to politely refuse the gift.

In the rare circumstance where local customs view refusal as an insult, you may have to accept the gift. In that instance, though, you should make it clear that you are accepting it on Aetna's behalf, rather than personally. Report the matter to your [Business Compliance Officer](#) or [internal legal counsel](#) to determine the best disposition of the gift.

A company that I use to arrange Aetna events offered me a discount on catering services for my family party. May I accept the discount?

Personal discounts that are offered to you because of your position with Aetna are considered gifts and must be refused. However, if this discount is available to all Aetna employees, it may be acceptable. Talk to your manager or [Business Compliance Officer](#) if you need help on a specific case.

A supplier offered me tickets to a World Cup game. May I accept the tickets?

No. Whether the tickets were offered for your personal use or in conjunction with a business meeting, this type of offer is expensive and may be viewed by others as an attempt to influence business decisions. Consult your [Business Compliance Officer](#) to determine whether it would be OK for you to pay the supplier the fair market value for the tickets.

I have been offered a fee of \$1,500 to speak at an upcoming conference. The conference sponsor also offered to pay for my travel and hotel expenses. The same offers have been made to all the speakers. May I accept these offers?

You may accept the offer of travel and hotel expenses, but you may not accept the fee. Alternatively, you might suggest that the conference sponsor donate that money in the sponsor's name to a charitable organization.

The regulators for our business segment will be on site doing their annual inspection of our books and records. Can we offer to take them to lunch or have lunch brought in to the office?

There are often special rules in the U.S. and other countries regarding gifts and hospitality for government employees and public officials. In certain instances, offering even a modest lunch could be illegal. Therefore, to be safe, contact your [Business Compliance Officer](#).

The decision maker from a prospective self-insured customer asked if we would fly him to our office so that he could meet team members, view our facilities, and learn about our processes. Can we pay for his plane ticket?

Generally, this would be permissible since there is a legitimate business purpose for the visit that is directly related to promoting, demonstrating or explaining Aetna's products or services and is unlikely to be viewed as a bribe (e.g., to gain or retain Aetna business or give Aetna an advantage). The expenses covered may include reasonable lodging and incidental meals, but should not include entertainment, meals or other activity not directly related to the business purpose. There are more stringent rules relating to Government and International customers. For additional information, see the section on "Travel for non-Aetna persons" in [Aetna International Anti-Corruption Guidelines](#) and consult with your [BCO](#).

Keeping Accurate Records

Our record keeping must always be accurate, legal and proper. We are required to submit many documents and reports to the U.S. Securities and Exchange Commission and other regulators. These materials and any other Aetna public communications must be complete, fair, accurate, timely and easy to understand.

If you suspect improper record keeping, report it immediately to your manager, **Business Compliance Officer** or other Aetna contact provided on the Resources page at the end of this document. You may also report your concern anonymously via the **AlertLine** or to Compliance & Regulatory Affairs, the Lead Director of the Board of Directors, or the Audit Committee of the Board of Directors at the address provided on the Resources page at the end of this document.

Record keeping and accounting controls

We keep books, records and accounts in a way that shows a fair, complete and accurate accounting of all business transactions and use of assets. Our records reflect reasonable detail to show the true nature of expenses and other transactions, who was involved, and any affiliation to Aetna or third parties, such as government entities.

We will never alter or falsify an Aetna company record. Unless permitted by applicable law or regulation, we do not execute off-balance sheet transactions, arrangements and obligations or maintain unrecorded funds or assets. If such transactions are allowed, we disclose them as required by the U.S. Securities and Exchange Commission or other applicable rules or regulations.

Officers and managers are expected to build and maintain an internal accounting system with controls that:

- Prevent unauthorized, unrecorded or inaccurately recorded transactions.
- Result in preparation of financial statements based on generally accepted accounting principles.

Managers also must ensure that third parties who create or update Aetna records follow the same rules, where appropriate.

Aetna is financially accountable to many of its constituents.

Bribes and other illegal payments

As we strive to further our business interests and outperform our competitors, we do so honestly, fairly, openly and with integrity. We have a zero tolerance policy towards bribery. We will never — either personally or through a third party, such as a broker or consultant — accept, make, or approve:

- Bribes or the promise of an improper benefit.
- Facilitating payments, which generally are small payments to low-ranking officials to expedite the performance of a routine act to which we are already entitled.
- Payment for illegal activity.
- Use of Aetna property or resources in a way that creates a conflict of interests or is against the applicable laws of countries where we do business.

We comply with all applicable anti-corruption and anti-bribery laws in the countries where we do business. These include the U.S. Foreign Corrupt Practices Act (FCPA) and U.K. Bribery Act 2010.

These laws make it illegal for companies or individuals to offer, pay or approve payments to government officials or others in order to influence official action or otherwise gain an improper advantage. This is true regardless of whether the payment is made directly or through a third party such as an agent or a broker. Anti-bribery laws and Aetna's anti-bribery policy apply to bribes of both government officials and private individuals or companies.

A "payment" refers to anything of value. This includes money or other benefits such as charitable or political contributions, sponsorships, scholarships, gifts, hospitality, entertainment and travel. A "government official" may include government workers, political parties and their officials, political candidates and the family members of these individuals — or others you might not think of as government officials, such as doctors, in certain instances.

Refer to Aetna's **FCPA and Other Anti-Corruption Laws Compliance Policy** and contact **International Compliance** or your **internal legal counsel** if you have questions.

Payments for goods or services

We make payments on Aetna's behalf to suppliers, consultants, brokers or other parties only for identifiable goods and services. These payments must be (i) appropriate in relation to the value of the goods or services provided and (ii) accurately and fully recorded in our expense records in enough detail to reflect the true nature of the expense, who was involved and any affiliation to Aetna or third-parties, such as government entities.

Q&A

I took a friend to dinner while visiting another city on business. Is it OK to put the cost of his meal on my expense report, as long as the total is not more than the allowed cost of a reasonable meal?

No. Your expense report should reflect the cost of your trip on behalf of Aetna; therefore, it should only include the cost of your meal.

We are hosting an international health care forum. I'd like to invite the administrator of a government-owned hospital in China. Can I also offer to pay for the administrator's travel and lodging costs?

Before you extend the invitation and offer to pay expenses for the hospital administrator, who would be considered a government official, consult your [Business Compliance Officer](#) or [internal legal counsel](#). Several factors determine whether your invitation would be OK: the location of the forum, the ratio of business to pleasure during the event, the nature of any extracurricular activities, any current contract negotiations with this government-owned hospital, or other business matters in which the administrator might be involved and local laws or ethics rules. If the invitation and offer to cover expenses could be perceived as an attempt to influence a public official in order to give Aetna a business advantage, it would not be appropriate to extend the offer. Refer to Aetna's [FCPA and Other Anti-Corruption Laws Compliance Policy](#) for more information.

Proper Use of Aetna Resources

Aetna's resources are intended for Aetna business only. Their use must be legal and proper. Resources include time, equipment and supplies, documents, and the information in our computing and communications systems.

Aetna may monitor or inspect information systems, e-mail, Internet use, computer files, or anything kept in Aetna furniture or on company property. Aetna may do this at any time for any company purpose.

Electronic communications

Electronic communications — e-mail, the Internet, and interactive social media applications — can be useful business tools. We use these electronic communications tools legally, wisely and responsibly, and we do so in a professional and respectful manner. We obey all applicable laws concerning copyright, trademarks, privacy, and financial disclosures.

You are responsible for all of your company communications — this includes e-mail or contact via social media websites, such as LinkedIn®, Twitter, or Facebook. Whenever you are identified as an Aetna employee, always communicate in a way that supports Aetna's interests and reputation. Make sure you don't make statements that anyone could interpret as being Aetna's corporate statement. Always respect personal privacy and protect Aetna's confidential or proprietary information. For additional guidance, see Aetna's Standards for Use of Social Media on the Compliance & Regulatory Affairs website.

Some departments permit incidental personal use of Aetna computers or other office equipment. If you are unclear on your department policy, ask your manager.

Business opportunities

Business opportunities that come to you through access to Aetna property or information, or through your position at Aetna, belong to Aetna. They may not be used for your benefit or the benefit of a friend or family member. You may not compete with Aetna.

If you leave or are no longer affiliated with Aetna, company property, resources and confidential information remain with Aetna.

We use Aetna resources legally, wisely and responsibly.



Q&A

May I use my Aetna computer to check my Facebook page during my lunch hour?

Generally, you should not use Aetna resources for personal use. Some areas do not allow the personal use of Aetna resources such as computers or phones at all. Other areas may allow incidental personal use as long as it is not excessive, inappropriate or abusive. For example, you may not use Aetna computers or office equipment for inappropriate things like gambling or accessing inappropriate websites or chat rooms. Ask your manager if you are not clear on your department's policy.

My department allows incidental personal use of Aetna computers and the Internet. May I use Aetna e-mail to communicate with customers of my personal real estate business?

No. Aetna property and resources should never be used for personal gain such as your personal real estate business.

Safeguarding Aetna's Information

We keep confidential and proprietary information about Aetna, our customers and employees, and all those who do business with us safe from inappropriate access, use or disclosure. In every country where we do business, we comply with applicable national, state, local and municipal privacy, data protection and security laws.

- Confidential information is any nonpublic information that is gathered, developed or produced by or for Aetna. Nonpublic information is any information that is not known by or available to the public.
- Proprietary information is nonpublic information that is created, recorded, or used in support of Aetna business or the business of another company. This information is owned by Aetna or the other company.
- To learn more about protecting information, contact your business area's Privacy Manager or your Business Compliance Officer.

You are responsible for safeguarding any Aetna confidential or proprietary information under your control.

Examples of Confidential and Proprietary Information

- Member information, including:
 - Name, address, date of birth, gender, Social Security or ID number, member ID number, cardholder data and other nonpublic personal information.
 - Financial, health or other information about the member that is not public.
- Proprietary and nonpublic information about anyone who conducts business with Aetna, such as employees, customers, suppliers, providers and shareholders.
- Any information that could help or harm our ability to meet our business goals.
- Information that is owned or provided by a third party and made known to Aetna under a nondisclosure, license or other agreement.

Guidelines for safeguarding information

You are responsible for the protection and privacy of any Aetna confidential and proprietary information under your control. Failure to do so may result in discipline, including the loss of your job.

To ensure the security of such information, we:

- Access, use, view or send confidential information within Aetna only if we are authorized and there is a valid and approved business reason to do so.
- Do not reveal confidential information to anyone outside Aetna unless required for legitimate business reasons and approved by management, internal legal counsel, or a Privacy Manager.
- Share only the minimum information necessary to meet business needs.
- Respect the confidential information and trade secret information of other companies. Never accept, keep or use improperly obtained information. Use other people's confidential or proprietary information only for permitted purposes. Do not ask another person to improperly disclose confidential information.
- Never post or reference confidential or nonpublic information on any social media site.
- Lock up paper documents when not in use.
- Encrypt all confidential information sent or stored electronically outside of Aetna, if allowed by local law.
- Comply with Aetna's Information Security Policy and Standards, and, as applicable, the Global Privacy and Data Protection Policy. If you have any question about your business area's privacy and information security procedures, contact your Privacy Manager.
- Properly dispose of Aetna information.

When information is no longer needed, dispose of it in a way that keeps the contents safe and private until the document can be destroyed properly.

Never destroy a document that could be relevant to an anticipated or pending lawsuit or investigation. If you have questions about these issues, seek direction from internal legal counsel.

For more information, see Aetna's **Records Retention and Destruction Policy**, **Privacy Policies**, **Information Security Policy and Standards** and Aetna's **Global Privacy and Data Protection Policy**.

Never destroy a document that could be relevant to an anticipated or pending lawsuit or investigation.



When you leave Aetna

When your Aetna job or affiliation ends, return any Aetna confidential or proprietary information. Do not use or disclose this information to an unauthorized entity, such as a different employer or company. Aetna may ask to inspect any materials you have when you leave, to prevent unauthorized removal of information. If you have signed an agreement with Aetna requiring continued cooperation, confidentiality, or non-solicitation of employees, you will need to honor those obligations after leaving Aetna.

Aetna can inspect any materials you have when you leave to prevent unauthorized removal of information.

Q&A

I am approved to use Aetna's claim systems. Can I use my system access to update or view information for my family or friends?

No. In your Aetna role, you should not handle or be involved in any matters related to information about you or anyone you know. Avoid even the appearance of anything improper. If you are assigned to a claim or other matter about a family member or friend, report the relationship to your manager and request that the matter be assigned to another worker.

My local government requires that we retain confidential information for a period that is longer than Aetna's requirement. What should I do?

If there is a contradiction in requirements for information retention, always retain information for the longest of the required periods. In this case, obey the local law that requires holding information for a period longer than Aetna's policy requires. If you need guidance, contact your Unit Records Manager.

Protecting Aetna's Intellectual Property

- Use names, logos, service marks or trademarks (“Marks”) only if approved by Brand and internal Intellectual Property (“IP”) legal counsel in accordance with Brand guidelines.
- Display copyright notices on all materials created by Aetna for outside use or broad internal use. Internal IP legal counsel will provide the right form of copyright notice.
- Do not share your own work-related invention, idea or innovation or Aetna’s confidential information or trade secrets unless you are authorized to do so and an appropriate non-disclosure agreement or license agreement is approved by internal legal counsel.

We protect intellectual property that is owned by Aetna or licensed from others.




MONOGRAMS OF THE 1890s AND 1900s



1904 OFFICIAL SEAL



1908 LOGO



1964 LOGO VARIATION



1965 LOGO



1991 LOGO



1996 LOGO



Respecting the intellectual property of others

- Use another party’s name, marks or copyrighted material only in accordance with the owner’s guidelines.
- Follow the terms of software product license agreements. Do not remove copyright notices from software or its documentation.
- Before you use all or part of a movie, newscast, podcast TV show or any third party copyrighted material in any Aetna production or presentation, you must get required written approvals from the copyright owner. Contact internal IP legal counsel for assistance.
- Assume that all material on the Internet is copyright-protected even if no copyright symbol (designated by ©) is shown.

Follow additional guidelines set forth in the **Aetna Intellectual Property Guide**.

Q&A

I want to use an excerpt from a copyrighted article in a presentation to my Aetna team. How do I get permission to use it?

Aetna has a license agreement with the Copyright Clearance Center. This allows us to share content of millions of publications, either via photocopy or electronic transmission, but only for use inside Aetna and only under certain conditions. Contact internal IP legal counsel to see if the article you would like to use is covered under this license. If you do use copyrighted materials, provide a credit statement to indicate the author and source.

I found an article on the Internet that I want to share with my coworkers. Can I copy and paste it to a document? Can I e-mail it?

No. Unless it is covered under Aetna’s Copyright Clearance Center license, you cannot copy and send the article without written permission from the owner. As an alternative, you can send an e-mail with a link to the page where the article appears.

Can I make a copy of a software program I use at work and load it on my home computer?

It is illegal to copy computer software or related documentation without the approval of the software product’s owner. Some software product license agreements may allow you to make a copy for backup or non-simultaneous use, but you should check with IT or your manager before you load the software on another computer.

Political, Legislative and Regulatory Activities

Personal political activities

Aetna encourages employee participation in political activities as citizens of their country, state, city, municipality, and neighborhood. This includes voting in elections and becoming educated about issues that affect the community and Aetna.

However, your involvement in politics must remain separate from your responsibilities as an employee. Avoid even the appearance that there is an Aetna link to your political work, your political opinions, or that Aetna endorses your political activity.

It is also important to avoid even the appearance that a political contribution is being made in order to influence official action or otherwise gain an improper advantage for Aetna. In some cases, personal contributions by Aetna officers, directors and senior managers, or even by their spouses and children in specific states, to government officeholders or a person running for office (e.g., Governor) that has or will have a direct or indirect ability to influence who will receive an award, may limit or disqualify Aetna from public procurement activity as well as jeopardize current accounts. Refer to our Foreign Corrupt Practices Act (FCPA) and Other Anti-Corruption Laws Compliance Policy and consult your Business Compliance Officer, Federal & State Government Affairs (F&SGA) or internal legal counsel for additional guidance.

Using Aetna resources for political purposes

Use of Aetna resources for any political activity must be processed through **F&SGA**, no matter what the source of the resources (corporate, business segment or region resources). For our International businesses, approval by **International Compliance** or **internal legal counsel** is required.

Federal Elections

It is against the law to use Aetna resources to make any political contribution related to a federal election, whether to a candidate, political party or political action committee (PAC). Contact **F&SGA** if you have questions.

The law does allow Aetna to use its resources to support the administration of the Aetna PAC. However, we are not permitted to contribute Aetna resources to the Aetna PAC for election contribution purposes.

Your involvement in politics must remain separate from your responsibilities as an employee.

State Elections

In some states we may use Aetna corporate resources for state election purposes, as allowed by that state's law.

Lobbying

Lobbying is the practice of communicating with government officials about matters that are important to Aetna. Lobbying is strictly regulated by Federal and State government rules and Aetna's own policies. Aetna employees may not communicate with elected officials or their staffs on behalf of Aetna without clearance from Federal & State Government Affairs (F&SGA).

As a general rule, communications with other specific government personnel are the responsibility of specific groups within Aetna, including Federal & State Government Affairs, Compliance and Law. Roles, responsibilities and contacts for each of these groups can be found on Aetna's internal website. All other employees, with the exception of certain designated employees, must seek authorization from the appropriate group before contacting, responding to, or meeting with government personnel.

If in doubt about whom to contact for authorization, seek clarification from your Business Compliance Officer or Federal & State Government Affairs.

- Only Federal & State Government Affairs (**F&SGA**) may hire lobbyists to help Aetna.
- There are specific and detailed federal and state rules regarding the use of corporate funds to procure or lobby for a government contract. Only **F&SGA** can determine appropriateness on a case by case basis.
- We do not use Aetna resources to lobby for or influence the awarding of any government business to Aetna without specific approval from **F&SGA** or **International Compliance**, as appropriate.

Q&A

I want to attend a political fundraiser in order to further business relations with a certain company. Can Aetna reimburse my costs for this event?

Attendance at, or use of, Aetna or Aetna PAC resources for, a political event on behalf of Aetna or Aetna PAC requires prior approval from Federal & State Government Affairs (**F&SGA**). Speak to F&SGA before attending this event as a representative of Aetna.

Communicating Publicly

When communicating in any public venue — including via the Internet or on social media sites — if your Aetna affiliation is known, you must take care to keep your own views separate from Aetna's views.

All communications (such as e-mails, letters, speeches or presentations) that are intended for a broad external audience — for example: all providers, all producers — must be reviewed and approved by the Marketing, Product and Communications department, together with **internal legal counsel** as necessary.

All media inquiries should be directed to **Corporate Communications** for response. Or, you may direct the caller to the **Media Relations Line** at the following number:

- **1-860-273-0888** — for corporate inquiries, including financial, litigation, corporate strategy and public affairs; health and related business inquiries, including product, network, service, technology and coverage issues; as well as all inquiries from regional media.

Designated employees who regularly interact with the media on Aetna's behalf must not publicly disagree with Aetna's official positions. This is because it may be hard for the media to separate the personal views of these employees from our official company positions.

Inquiries from financial analysts or shareholders must be directed to the Chief Financial Officer, or Head of Investor Relations.

Only senior managers and those chosen by Aetna for government relations or legal work can formulate and express Aetna's views on legislation, regulations or government action. Other employees may communicate Aetna's views only with specific guidance from **F&SGA**.

Requests from suppliers for product or service endorsements should be directed to the **Procurement mailbox**.

Q&A

I am active on a social media site. If I have an opportunity to post information that would be good for our business, may I post it?

You may not speak for Aetna unless your management has given you approval to do so. If you post information that relates to your job responsibilities, you must disclose your affiliation with Aetna, and clearly state that your comments reflect your personal opinions and do not necessarily reflect the opinions of Aetna. Never post Aetna confidential information on a social media site or any other website.

May I use Aetna letterhead to write a letter to the editor of my local paper? I believe the issue is important to our company.

You may not use Aetna letterhead or your Aetna job title to write about any issue unless you have been authorized by Aetna to do so. If you believe the issue requires an official response from Aetna, speak to your manager and **Business Compliance Officer** to determine if it is appropriate for you to speak on Aetna's behalf.

The supplier who provides software enhancement services to my department asked me to provide a quote he can post on his company website about how much Aetna values his services. As long as I only say good things, is this okay?

No. You may never speak for Aetna unless you have permission to do so. In this case, you should refer the request to the **Procurement** department.



Because companies are watched closely, any public statement that may be linked to Aetna must be given with care. You may not speak for Aetna unless you have received approval to do so.

3. Our Promises to One Another

We treat one another with respect and collaborate to achieve results.

Respect in the Workplace

We strive for a workplace that is inclusive and safe for our employees and business partners. Our policies and programs are designed to promote fairness and respect for all individuals and to foster a workplace where diversity and inclusion are valued. We treat one another with respect and collaborate to achieve results. We do not tolerate discrimination, harassment or retaliation. Behaviors that put our employees or business partners at risk are not allowed.

Fair employment practices

Aetna's goal is to have a work force that reasonably reflects the diversity of qualified talent available in the labor market.

We base employment decisions, including selection, development and compensation decisions, on an individual's qualifications, skills and performance. We do not base these decisions on personal characteristics or status, such as race or ethnicity, color, sex, pregnancy, national origin, citizenship, ancestry, religion, age, disability, military status, veteran status, sexual orientation, gender identity and/or expression, marital or family status, and/or genetic information.

If you work in the U.S., you can find more details on Aetna's Equal Employment and Affirmative Action policies in Access HR. If you work outside of the U.S., please contact your assigned HR Representative.

Harassment-free workplace

We strive to have a workplace that is free from harassment.

Harassment is any behavior that unreasonably interferes with a person's job performance or creates a workplace that is intimidating, hostile or offensive.

We treat others with respect, and refrain from unwelcome or potentially offensive verbal or physical behavior, including slurs, name calling, jokes, touching and other potentially harassing or intimidating actions.

We do not tolerate inappropriate behavior or harassment involving employees or business partners, including when it is based on the characteristics or statuses described above.

Aetna has the discretion to decide what behavior is not acceptable in our workplace. We will discipline those who act in an unacceptable way.

Managers are expected to:

- Administer Aetna policies and programs in a way that is appropriate, consistent and does not discriminate.
- Monitor the workplace and take steps to prevent and address inappropriate behavior.
- Support our fair hiring practices and policies.
- Make reasonable accommodations for workers with disabilities in keeping with Aetna policies and the law.

To avoid even the appearance of favoritism in the workplace, people with close personal relationships may not be in supervisory/subordinate reporting relationships or other positions of authority that can influence employment decisions.

Personal relationships

To avoid even the appearance of favoritism in the workplace, people with close personal relationships may not be in supervisory/subordinate reporting relationships or other positions of authority that can influence employment decisions. For example, you may not supervise or be supervised by a relative, or anyone with whom you have a close personal relationship.

If you find yourself in this situation, you must disclose it by calling the **HR Contact Center** or your **Business Compliance Officer**. Failure to disclose a personal relationship in your reporting chain can be grounds for disciplinary action.

Q&A

A co-worker sometimes tells off-color jokes in the break room. Most people laugh, but he makes some of us uncomfortable. What should I do?

Tell your co-worker that the jokes make you uncomfortable and he should stop. If you are not comfortable addressing it with the co-worker, or, if addressing it does not work, speak to your manager, call Human Resources or contact AlertLine to report the situation.

I believe my manager favors someone in our area. Should I call AlertLine about this?

Generally, you should contact the **HR Contact Center** to discuss workplace concerns. However, if you are uncomfortable doing so and would prefer to remain anonymous, you may contact **AlertLine** at any time for any employment situation that concerns you.

I supervise the woman that my son is planning to marry. What should I do?

Disclose this situation to your manager, Human Resources or your **Business Compliance Officer**. They will work together to see if a change in reporting relationships is needed.

Safe and Healthy Workplace

We want a workplace that protects the health and safety of our employees and business partners. That is why Aetna prohibits intimidating behavior, threats and acts of violence in our workplace. We also require our employees to come to work free from the negative effects of drugs or alcohol and be able to perform all of their job duties.

Alcohol and drugs

Our Alcohol and Drug policy does not allow you to unlawfully make, distribute, dispense, possess, use, transfer, solicit, purchase or sell:

- Alcoholic beverages.
- Controlled substances.
- Illegal or prescription drugs.

In addition, if you are convicted of or plead no contest to a drug-related crime occurring in the workplace, you are required to tell your manager within five days of the conviction or plea.

This Alcohol and Drug policy applies while you are on Aetna property and while you are doing Aetna business anywhere. You can find more details on this policy in [AccessHR](#).

To help you comply with our Alcohol and Drug policy, many Aetna offices have an Employee Work/Life Assistance (EWLA) program which offers assessment, counseling and referrals for alcohol and drug-related problems.

If you believe that you have experienced or witnessed inappropriate behavior, you must report it to your manager, a senior manager, the [HR Contact Center](#) or anonymously by calling [AlertLine](#). Our non-retaliation policies protect anyone who makes a report in good faith.

For more information on our employment policies, practices and expected behaviors, see the Workplace Policies section in [AccessHR](#).

Security is everyone's concern at Aetna.

Security and workplace violence

Security is everyone's concern at Aetna. We do not allow unauthorized or unwanted persons to trespass on Aetna property. Each of us must be aware of specific security concerns that may exist at our workplace and report any suspicious persons or activities.

In accordance with applicable laws, Aetna policy generally prohibits bringing weapons, firearms, ammunition, explosive devices and dangerous substances onto Aetna property. We do not tolerate acts or threats of violence, either verbal or physical. If you are in the U.S., report any danger or threat, immediately to [Corporate Security](#) at **1-800-682-3213** and/or to your local police. If you are outside of the U.S., contact local law enforcement.

Q&A

A co-worker seems to be anxious and unusually sensitive. Yesterday she spoke very harshly to another co-worker. What should I do?

We encourage you to be alert to sudden or dramatic changes in the workplace environment. Speak to your manager about the situation.

If I am attending an event on behalf of Aetna, is it OK to have a glass of wine with dinner?

Moderate intake of alcohol, such as a glass of wine with dinner, is permissible at an Aetna event. However, if you will be driving or if the alcohol will impair your ability to interact with others in a courteous and business-like manner, you should refrain.

aetna



**MIGUEL X
ALVAREZ**



4. Our Promises to Conduct Business Fairly

Aetna's reputation and continued success depend on each of us conducting business in a fair, honest and responsible manner.

Our products and services are primarily contractual promises. As we strive to outperform our competition, we will do so honestly, openly, fairly and with integrity. We will deal fairly with our customers, members, providers, suppliers, regulators, shareholders and others around the world with whom we do business.

Guidelines for Fair Dealing

In conducting Aetna business, we follow these guidelines:

- Refuse to participate in any conduct or sales or other practice that is intended to mislead, manipulate, or take unfair advantage of anyone, or misrepresent Aetna products, services, contract terms or policies to anyone.
- Refuse to be part of the following or any other practices that may illegally restrain competition:
 - Fixing prices
 - Allocating or dividing markets or customers
 - Boycotting or refusing to deal with competitors, customers or suppliers
- Do not discuss or share sensitive competitive information (for example, relating to pricing or market share) with representatives of other companies or industry and trade associations, unless your manager, in consultation with **internal legal counsel** or your **Business Compliance Officer**, has given you approval to do so.
- Do not take part in industry or trade associations unless your manager approves it after talking with **internal legal counsel** or your **Business Compliance Officer**.
- Never break any law or regulation, including unfair trade or insurance practices laws.
- Consult with **internal legal counsel** on any matter relating to actual or potential noncompliance with any law or regulation or any of Aetna's contractual commitments.
- Know and follow our **Records Retention and Destruction Policy**. Never destroy a document that could be relevant to an anticipated or pending lawsuit or investigation. On these issues, seek the direction of **internal legal counsel**.

Recoupment policy

Some senior executives are subject to Aetna's policy on recoupment of performance-based compensation. Under this policy, Aetna may recoup (that is, recover) specified performance-based compensation from an executive under certain circumstances in the event there is a material restatement of Aetna's financial results.

Preventing fraud, dishonesty and criminal conduct

Each of us has a responsibility to do our job honestly and in compliance with applicable laws, regulations and ethics rules. Fraud, dishonesty or criminal conduct by anyone doing work for, or business with, Aetna is not allowed.

Examples of conduct that is not allowed include:

- Stealing employee or Aetna property.
- Misusing an Aetna computer, telephone, e-mail or other resource.
- Making false records or reports, such as signing another person's name, providing inaccurate information on your timesheet, altering an Aetna document or logging in an Aetna database activities not actually performed.
- Destroying, changing, falsifying or hiding evidence of any activity that violates this Code of Conduct.

If you see or suspect fraud, dishonesty or criminal conduct, immediately report the situation to **Investigative Services, internal legal counsel**, or your **Business Compliance Officer**. You may also report your concern anonymously via **AlertLine** or by writing to the post office box address listed on the Resources page at the end of this Code.

You must cooperate and be truthful during all Aetna investigations. If law enforcement or another government agency contacts you about a possible violation, immediately report the contact to **Investigative Services, internal legal counsel** or your **Business Compliance Officer**.

Do not:

- Talk about a matter involving a possible violation with anyone except those authorized to investigate the matter.
- Discipline an employee or officer until you:
 - Talk to **Investigative Services**, and
 - Are cleared to do so by your **Business Compliance Officer** or **internal legal counsel**, in consultation with HR.
- Promise not to report the conduct.
- Try to talk anyone out of reporting real or suspected illegal activity or improper conduct to any law enforcement or government agency.
- Retaliate against anyone because he or she in good faith:
 - Reports a possible violation of law, regulation or Aetna policy,
 - Helps Aetna or a government agency investigate a possible violation, or
 - Files or participates in a proceeding to address a possible violation.

Q&A

After I attended a meeting with an agent, I learned that the agent had misrepresented an Aetna product to our customer. What should I do?

Explain the situation to your manager, [internal legal counsel](#) or [Business Compliance Officer](#). They will advise you on how to take steps to correct this issue with the customer and agent.

I suspect a coworker is involved in a fraudulent activity. Should I talk to her before I report my suspicion?

No. Fraud is a serious offense. If you suspect fraudulent activity, you must report it immediately to [Investigative Services](#), [internal legal counsel](#), or your [Business Compliance Officer](#). You may also report your concern anonymously via [AlertLine](#) or by writing to the post office box address listed on the Resources page at the end of this Code. Do not discuss it with anyone else or promise not to report it.

Doing Business Globally

Our businesses around the globe must comply with many U.S. and other country, state, local and municipal laws, regulations and rules. Our level of compliance is often tested through federal government audits, state market conduct exams, and other regulatory reviews and requests for information. In all our business locations around the globe, we obey all laws and regulations that apply to Aetna's business, and we follow all Aetna policies.

We recognize that local cultures, customs, and business practices vary from country to country. We respect local customs to the extent possible without breaking the law or violating Aetna policies.

Anti-terrorism, money laundering and boycott compliance

In the U.S. and other countries where we do business, laws and regulations exist to combat the financing of actions (through money laundering or other activities) that pose national security or criminal threats. Examples include: terrorism, drug trafficking, and arms and weapons dealing.

To ensure Aetna's full compliance with these laws as they apply to our businesses, you should know and follow Aetna's [International Trade guidelines](#) to ensure compliance with:

- Applicable requirements of anti-money laundering laws and regulations of the U.S. and other countries, such as the United Arab Emirates, Ireland, United Kingdom and Singapore.
- Requirements of the U.S. Office of Foreign Asset Control (OFAC), including those related to OFAC Country Sanctions or doing business with anyone on the Specially Designated Nationals (SDN) List.
- Applicable requirements of the European Union (EU) Financial Sanctions Regime, United Nations Common Foreign and Security Policy (UN CFSP) and Monetary Authority of Singapore (MAS).
- Laws prohibiting companies from participating in or cooperating with international trade embargoes, boycotts, or unrecognized sanctions that have been imposed by other countries.

If you have questions on how these laws and related guidelines apply, contact [International Compliance](#) or your [Business Compliance Officer](#), and promptly report any concerns you may have.



Q&A

A customer proposal requested a list of all business Aetna conducts in a certain country. Should I provide this information?

No. Providing this information could violate U.S. anti-boycott laws. These laws do not allow U.S. companies to participate or cooperate with international boycotts that the U.S. does not recognize. These laws also require companies to report any request made by others that they participate or cooperate in such a boycott. If you receive or suspect a boycott request, send a note to [International Compliance](#). You will be contacted with advice on how to proceed.

A company we are considering for a new contract has two employees in a country that I think may be on the OFAC Sanction list. Should I be concerned?

Yes. It is important that each of Aetna's business areas conducts business in compliance with applicable OFAC, EU or other country sanctions. Refer to the [Sanctioned Countries Guidance](#) available on AetNet and contact [International Compliance](#) if you have questions.

Government Contracts

Aetna is a responsible and reputable government contractor. We work hard to properly administer the contracts we earn. We strive to conduct these activities in a way that fully complies with all the laws, regulations and ethics rules that apply. We hold ourselves to high standards of business conduct and integrity. We hold any subcontractors involved in supporting Aetna's government contracts to the same standards.

Health care reform legislation enacted in the U.S. in 2010 expands the scope of Aetna's government business as well as regulation of that business. U.S. federal and state laws impose stringent rules with substantial penalties for violations.

One of these sets of rules, the False Claims Act (FCA), imposes liability on any person or organization that knowingly submits a false or fraudulent claim for payment to the federal government or retains federal funds to which they are not entitled.

As a health care company, we must comply with the FCA. If you question the accuracy or completeness of data sent to any government, believe that Aetna may have been overpaid by a government agency, or have any concern about any of our government business policies, practices or processes, promptly raise this concern to your manager or **Business Compliance Officer**.

For other issues involving U.S. federal or other country, state, local or municipal government, work with your **internal legal counsel** or with **Federal & State Government Affairs**.

Government contracts often include special rules that we must follow. If you work in an area that contracts with a government or supports a government contract, it is your responsibility to understand and abide by these rules.

Guidelines for government contracts

- We follow all laws that apply to government contracting and procurement in the countries where we do business. This includes all employment laws that apply to contractors, as well as anti-corruption laws such as the **U.S. Foreign Corrupt Practices Act and U.K. Bribery Act**. Laws, regulations and ethics rules vary by locality. Consult your **Business Compliance Officer** or **internal legal counsel** with questions.
- We provide current, complete and accurate information for all government contracts. You and Aetna may be liable for false, incomplete or misleading documents or statements.
- We never give or agree to give anything of value to government customers, employees or third parties to influence the award or renewal of a government contract. If you are uncertain about how to apply the law in your situation, contact your **Business Compliance Officer, internal legal counsel** or **F&SGA**.
- Some government contracts require us to certify that we did not violate procurement laws or regulations in winning the contract. If you are asked to sign a certificate or disclosure related to a government contract, contact your **internal legal counsel** or your **Business Compliance Officer** before signing.
- Promptly contact **internal legal counsel, Regulatory Compliance** or **F&SGA** if any part of a government, including a U.S. state insurance department, contacts you on a new situation or matter.
- We comply with all requirements — often referred to as “revolving door” rules — for hiring former government officials. Contact your **Business Compliance Officer, internal legal counsel** or **F&SGA** before making an offer to hire a current or former government employee, as the situation must be analyzed and a decision reached on what restrictions may apply.
- No gifts, entertainment, meals, lodging or travel may be provided to a government official or employee without prior approval from your **Business Compliance Officer, internal legal counsel** or **F&SGA**.



Q&A

One of my municipal customers has asked that we contribute to a local charity event to benefit the town's firefighters. Is there any reason we can't do that?

There might be and, therefore, you need to check with your **Business Compliance Officer**. Government plans are often subject to very broad restrictions about soliciting or receiving payments from suppliers, particularly payments that might be seen as influencing the award or renewal of business. Aetna strongly supports community involvement. However, any donation to or at the request of a government customer or prospect should be reviewed by your **Business Compliance Officer** or **internal legal counsel** to determine whether it is allowable.

We are going to hire a former public sector Human Resources Head to help us respond to a state RFP. We'll pay her a fixed fee with a success bonus if we get the business. Is this okay?

Increasingly, former government officials are subject to "revolving door" restrictions related to dealings with their prior employer. Therefore, it must be determined if and how these rules apply to your prospective hire prior to engagement. Also, it is Aetna's policy not to engage procurement consultants on a contingency fee basis. Consult with your **Business Compliance Officer** or **internal legal counsel** before engaging any procurement consultant to work in the public sector.

I don't work in either the U.S. or the U.K. In my country it is customary to give gifts when meeting with a business prospect, including a government official. If I am not violating any local law, do I need to be concerned?

Yes. Both the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act extend to activities anywhere in the world. Gift policies should be reviewed carefully with **internal legal counsel** or your **Business Compliance Officer**. Remember, though, with regard to business gifts, the safest course of action is not to give or receive any gifts at all.

U.S. Federal government contracts

- Follow the laws, rules, regulations and requirements of contractor conduct in the Federal Employees Health Benefits Program (FEHBP), Medicare, Medicaid and other U.S. government programs.
- All employees who directly or indirectly administer and/or deliver Medicare-related services for Aetna must complete mandatory annual training.
- Follow the rules on recruiting and hiring current or former federal workers. Your **internal legal counsel** or **Business Compliance Officer** must give approval before you talk to such individuals about working at Aetna.
- Notify **internal legal counsel** or your **Business Compliance Officer** right away if you have been debarred, excluded or suspended from working with any government sponsored program. This includes Medicare and Medicaid. You must also tell them if you know of any other reason why you might not be permitted to perform work related directly or indirectly to a government sponsored program, or if you know of anyone who works for or is affiliated with Aetna who is in this situation.

Q&A

I have an appointment to meet with an official from the federal government agency we are seeking to do business with. May I take her to lunch after the meeting? Can I leave her with an Aetna logo pen to keep us fresh in her mind?

Generally government entities have specific rules around accepting gifts (of any size or significance) from a supplier. So, before you extend the luncheon invitation or give the logo pen, consult with your **Business Compliance Officer** or **internal legal counsel**.

The RFP for a potential government customer includes one required item that Aetna cannot accommodate. I hate to have this one item jeopardize our chances to win this account. Can I just indicate in the RFP that we are able to provide the item and worry about the consequences later?

No. We should never make a commitment that we cannot meet and must be diligent, thorough, and honest in all of our business dealings. Failure to do so is not only unethical, it might also be considered a violation of the False Claims Act. Possible consequences for violation of this law include civil and criminal penalties.

Insider Trading

Insider trading refers to the illegal practice of trading securities while possessing “material nonpublic information” about a company.

- “Material” information is information that a reasonable investor would think is important when making a decision about buying, holding or selling a company’s securities. Information that affects the price of Aetna’s or another company’s stock is typically “material.”
- Information is considered “nonpublic” until it is made publicly available (via a press release or public filing with the Securities and Exchange Commission, for example) and the public and the financial markets have had time to read and understand it.

Insider trading is unethical and illegal under U.S. federal and other local securities laws. It is generally illegal for any person who possesses “material nonpublic” information about a company to:

- Buy or sell stock, options or bonds or other debt instruments of that company.
- Tell or “tip” anyone else by communicating the nonpublic information to them.

You must follow all insider trading and securities laws, regulations and policies (including Aetna’s “blackout policy” which prohibits trading in Aetna’s securities during specified time periods) applicable to securities transactions and nonpublic information. Insider trading will be dealt with firmly by Aetna, and both you and Aetna could face civil and criminal penalties for insider trading.

For questions, employees and officers should contact **internal legal counsel**. Directors should contact the Corporate Secretary or General Counsel.

What Are Some Examples of “Material” Information?

Examples of “material” information include:

- Financial results or expected results for the quarter or the year
- Possible mergers or acquisitions or financing transactions
- Major changes in customer relationships
- Winning or losing an important contract
- Information about new products
- Information about a change in policy
- Changes in senior management
- Major lawsuit or regulatory developments, including fines or sanctions

Whether or not information is “material” may depend on the circumstances. Contact **internal legal counsel** for guidance.

What Are Some Examples of Securities?

Insider trading rules apply to any transaction regarding securities. Examples include:

- Aetna's or another company's common stock, preferred stock, or bonds, notes or other debt instruments
- Options or swaps on Aetna's or another company's stock
- Changes in the level of your contribution to the Aetna stock fund in Aetna's 401(k) plan
- Transfers, that you control, of accumulated values into or out of any Aetna common stock account in any Aetna benefit plan, including Aetna's 401(k) plan

What Rules Do I Need to Follow To Protect Myself and Aetna When I Trade Securities?

- Do not trade Aetna securities if you have "material nonpublic" information. In some cases, some employees or directors can trade Aetna securities based on a prearranged plan that complies with the law. Entering into such a pre-arranged plan, and any changes to it, must be approved by the Chairman, or someone appointed by the Chairman, in consultation with **internal legal counsel**.
- You should limit your transactions to times when it is reasonable to think that all material information is public. Let two business days pass between the time the information is made public through news services and the time you place your order to buy or sell.
- You may not buy or sell "put" or "call" options or other derivatives on Aetna stock.
- You may not sell Aetna stock short.
- Do not trade securities of another company if you have material nonpublic information about that company or if the trade for other reasons is not legal or creates a conflict of interests. This rule applies to securities whether they are traded in the U.S. or foreign markets.
- Do not share material nonpublic or other confidential information that you have about Aetna or any other company with anyone who is:
 - Inside Aetna, unless they need the information to do their job.
 - Outside Aetna, unless your manager has worked with **internal legal counsel** to approve sharing it.
- Information you have because of your position at Aetna belongs to Aetna, and you must not take or share it for anyone's benefit. Giving a tip based on this information is unethical, illegal and a violation of our Code even if you do not profit from it.
 - When you buy or sell Aetna securities, you must tell the broker about your relationship with Aetna.

Q&A

Do I have to get permission to trade Aetna securities?

It depends on your job and the information you may have had access to. Some people have regular access to or can see material information about Aetna that is not known to the public. To help make certain that we follow the securities laws, Aetna must give its specific approval before these particular employees can buy or sell an Aetna security. Employees who are subject to this requirement will get a personal notice that gives them instructions on the procedures to follow.

At a family party a relative asked me some very specific questions about Aetna's business. Is it OK to discuss these issues with family?

Insider trading rules and Aetna policies on confidential information apply to members of your family and any person living in your home. You should never share confidential information about Aetna with friends or family members.



5. Our Promises to the Community

Aetna strives to be a responsible corporate citizen, improving the quality of life in the communities where we live and work. This starts with our mission statement and corporate values and is demonstrated through our application of responsible business policies and practices.

Aetna has been widely recognized for its efforts in community building, environmental efforts, and diversity.

- Aetna was honored by FORTUNE as the “most admired” company in the Health Care Insurance and Managed Care category in 2010 for the third straight year, based in part on a number one ranking in the sector for social responsibility.
- In 2009, Aetna’s innovative efforts to address global climate change were recognized with a Connecticut Climate Change Leadership Award by the State of Connecticut. Aetna also earned Leadership in Energy and Environmental Design (LEED®) Silver certification in 2009 for the environmentally friendly construction of the new Aetna Customer Center within its 78-year-old headquarters building.
- Aetna was named DiversityInc’s Top Company for Community Development in 2009 for our support of nonprofits that share our focus on building strong communities, ending racial and ethnic disparities in health care, improving health literacy and promoting disease prevention.

Community Involvement

Aetna’s independent charitable and philanthropic arm, the Aetna Foundation Inc., is a national health foundation that promotes wellness, health, and access to high-quality health care for everyone. Since 1980, Aetna and the Aetna Foundation have contributed over \$445 million in grants, sponsorships and social investments. This work is enhanced by the time and commitment of Aetna employees, who have volunteered 3.4 million hours since 2003.

Diversity at Aetna

We recognize the impact and importance of diversity in all aspects of our business.

- We seek to develop a workforce that fully understands the customers we serve by:
 - Aligning diversity to The Aetna Way, and
 - Creating and sustaining a positive work environment enabling us to attract, develop and retain the highest performing talent in an increasingly global and diverse marketplace.
- Our supplier base includes small businesses, women- and minority-owned, and Lesbian/Gay/Bisexual/Transsexual (LGBT)-owned business enterprises.
- We are furthering our expansion into the global marketplace by:
 - Broadening and deepening partnerships that amplify and strengthen our contributions to the communities we serve around the globe, and
 - Identifying internal and external partners to effectively bring our health and related products and services into the world marketplace.

Public Policy Leadership

Aetna for many years has been committed to transforming health care by playing a leadership role in advancing public policy solutions. We support a renewed focus on wellness and preventive care, to help consumers become more engaged in their health.

Environmental Practices

As a health care benefits company, Aetna is dedicated to helping people achieve health and financial security. We believe fostering a healthy environment is an important part of this mission. We are committed to limiting our environmental impact by reducing our energy consumption and use of other resources. We will work to identify emerging environmental issues and address them, to the extent that we can, because we recognize the impact a clean environment has on the health of our members.

Code Administration and Waiver

- Any waiver of this Code for our directors can only be granted by the Aetna Board of Directors or the Board's Nominating and Corporate Governance Committee.
- Any waiver of this Code for executive officers can only be granted by the Aetna Board of Directors or by the Board's Audit Committee.
- Any waiver of this Code for other officers or employees can only be granted by the Chairman.
- Any waiver of this Code for directors, executive officers, the Chief Executive Officer, the Chief Financial Officer, the Corporate Controller, or people with similar functions will be put on our public website within four business days after the waiver is granted.

Resources for Raising and Reporting Concerns

If you have concerns about potential non-compliance or suspected fraud, waste and abuse, or need to report a violation of the Code of Conduct, Aetna policy, or the law, these resources are available to help:

- Your manager
- **Business Compliance Officer**
- **Internal Legal Counsel**
- **AlertLine** – you may report issues anonymously, 24 hours a day, 7 days a week.
 - In the U.S., dial 1-888-891-8910.
 - Outside of the U.S., dial the **AT&T Direct access code** for the country you are calling from followed by **1-888-891-8910**.
 - Via the Internet at <https://aetna.alertline.com>.
- Or, to make complaints or report concerns directly to Compliance & Regulatory Affairs, the Lead Director of Aetna’s Board of Directors or the Audit Committee of the Board of Directors, you may send your communication addressed to any of the foregoing at:
 - P.O. Box 370205
 - West Hartford, CT 06137-0205

Every reported compliance or fraud, waste and abuse concern will be thoroughly investigated and addressed or corrected, as appropriate. Rest assured that your reports are welcomed and encouraged. Aetna prohibits intimidating or retaliating against anyone who in good faith:

- Makes a complaint or reports a violation to Aetna or any law enforcement or government agency.
- Collaborates or helps with a government or internal investigation.
- Provides information to the government or Aetna about a breach of law or Aetna policy.

For assistance with specific issues:

If the Issue Concerns:	Contact this Resource:
<ul style="list-style-type: none"> • Human Resources issues: <ul style="list-style-type: none"> - Employment practices - Harassment - Respect in the workplace - Workplace behavior • HR Policies 	<ul style="list-style-type: none"> • U.S. Employees: HR <ul style="list-style-type: none"> - WebChat from Working At Aetna webpage - HR Contact Center (1-800-AETNA-HR) • Employees outside of the U.S.: <ul style="list-style-type: none"> - Speak with your HR Representative
<ul style="list-style-type: none"> • Misuse of company resources • Fraud: financial or business practices 	<ul style="list-style-type: none"> • Compliance & Regulatory Affairs • Investigative Services • Special Investigations Unit • AlertLine • Post office box
<ul style="list-style-type: none"> • Confidential information: <ul style="list-style-type: none"> - Privacy - Information Security 	<ul style="list-style-type: none"> • Privacy Manager
<ul style="list-style-type: none"> • Conflicts of Interests 	<ul style="list-style-type: none"> • Compliance & Regulatory Affairs
<ul style="list-style-type: none"> • Laws • Other legal questions 	<ul style="list-style-type: none"> • Internal Legal Counsel
<ul style="list-style-type: none"> • Political activities • Government contracts 	<ul style="list-style-type: none"> • Federal & State Government Affairs • Internal Legal Counsel
<ul style="list-style-type: none"> • Contacts to/from regulators 	<ul style="list-style-type: none"> • Regulatory Compliance • Business Compliance Officer
<ul style="list-style-type: none"> • Insider trading clearance 	<ul style="list-style-type: none"> • Internal Legal Counsel from Corporate Securities Unit of Law & Regulatory Affairs
<ul style="list-style-type: none"> • OFAC sanctions • FCPA or Other Anti-Corruption Laws 	<ul style="list-style-type: none"> • International Compliance
<ul style="list-style-type: none"> • Boycott Requests 	<ul style="list-style-type: none"> • International Compliance
<ul style="list-style-type: none"> • Contacts to/from Media 	<ul style="list-style-type: none"> • Corporate Communications

**We make good on our promises because, quite simply,
it is The Aetna Way. Each of us must be committed
to the highest standards of business conduct.**

