



Aetna’s Anti-Money Laundering (AML) and Financial Sanctions Compliance Policy (“the Policy”):

Aetna is committed, as set forth in the Aetna Code of Conduct, to full compliance with all applicable laws and regulations. This includes applicable AML and financial sanction regulations, including those of the US Department of Treasury Office of Foreign Assets Control (“OFAC”), US Bank Secrecy Act (“BSA”), USA PATRIOT Act, United Kingdom and European Union (“EU”) Financial Sanctions Regimes, United Nations Common Security Council and other regulations in countries where Aetna does business.

Based on assessed inherent risks, Aetna has implemented and administers the Policy to ensure that Aetna conducts its business in compliance with these laws and regulations. Aetna requires all its employees and external entities that act on its behalf to adhere to the Policy so that Aetna can effectively:

- Prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities;
- Ensure that it does not engage in any business in any sanctioned countries or with any blocked individuals/entities on applicable regulatory sanctions list including OFAC’s Specially Designated Nationals (“SDN”) list; and
- Report violations and suspicious activities to applicable regulatory and law enforcement agencies, as required by laws and regulations.

The Policy applies to all business operations of Aetna, its subsidiary companies, and external entities conducting business on Aetna’s behalf, and to all products and services that Aetna offers. The Policy serves as the foundation for Aetna’s risk-based AML and Financial Sanctions Compliance Program (referred to as “the Program”).

Aetna’s AML & Financial Sanctions Compliance team monitors for changes in regulations administered by OFAC and other applicable regulators, and conducts ongoing reviews to ensure currency of the Program.

Due Diligence, Systematic Controls and Ongoing Screening:

- Aetna business areas have implemented risk-based workflows and systematic controls to safeguard against:
 - Providing insurance coverage to individuals residing in sanctioned countries;
 - Entering into contracts or business arrangements with customers, providers, vendors or brokers located in sanctioned countries; and
 - Sending correspondence to members or others, or transferring funds to banks, in sanctioned countries.
- Business Units and their external agents that act on Aetna’s behalf are required, as warranted based on assessment of risk, to perform due diligence and collect minimum customer and payee identification information. This is to ensure the validity of those with whom Aetna does business and to facilitate AML & financial sanctions screening in compliance with applicable laws and regulations.
- Aetna performs regular and ongoing screening screen of our members, customers, providers, vendors, suppliers and other third parties to confirm that none are on OFAC’s specially SDN Lists, in sanctioned countries, or otherwise subject to applicable economic sanctions.



- If a positive match is identified, Aetna complies with OFAC and other regulators' notification requirements and, as warranted, blocks the associated assets.
- Due diligence and pre-payment screening is performed for Aetna's higher risk businesses.

Annual Online and Live Training and Periodic Awareness Communications:

- Annually all employees involved in our International and other higher risk businesses complete online financial sanctions training.
- Additionally most employees involved higher risk businesses participate in live training on an annual or as needed basis.
- The AML & Financial Sanctions Compliance team provides periodic updates to inform employees, customers and other business partners of new Policy developments, as warranted.

Raising Concerns and Suspicious Activity Reporting:

- Employees are required to promptly raise questions or concerns and report any known or suspected violation of the Policy or applicable laws and regulations to their manager and to the AML & Financial Sanctions Compliance team.
- Employees and third parties may also make confidential, anonymous reports in relation to any actual or potential violation of the Policy by contacting Aetna's AlertLine® at 1-888-891-8910 in the U.S or on the web at <https://aetna.alertline.com>. (Note: Outside of the U.S., dial the AT&T Direct access code for the country you are calling from followed by 888-891-8910. AT&T Direct access codes can be found at <http://www.usa.att.com/traveler/index/jsp> or by contacting your local operator.)
- Aetna prohibits retaliating against anyone because he or she in good faith raised concerns or reported suspected violations.
- Higher risk businesses have implemented procedures and training regarding monitoring for suspicious transaction and for escalating concerns internally for appropriate review and filing of suspicious activity reports to regulatory authorities and law enforcement agencies as warranted.