

Updated Country Regulations and Policy Information

Important International Healthcare Guidelines

Our goal is to design products and services that comply with regulations in countries around the world. We make use of our global reach and dedicated resources to ensure compliance with sanctions published by regulators including the United States Department of Treasury's Office of Foreign Asset Control (OFAC), European Union (EU) Financial Sanction Regime, United Nations Common Foreign and Security Policy (UN CFSP), and other regulatory authorities from countries where Aetna does business with.

Please see this communication for the most updated information detailing updated country laws and Aetna policy rider.

Country/Region sanctions

Crimea (Annexed Region of Ukraine), Cuba, Iran, North Korea, Syria, Sudan (North)*

Aetna is restricted from issuing or entering into contracts in the countries/region listed above. This includes contracts covering groups or individuals and contracts for business arrangements with network providers, intermediaries/agents or others located or incorporated in those countries/region. This restriction also prevents Aetna from sending correspondence or funds (including claim reimbursements and direct claim settlements) into these countries/region.

- In some limited instances, Aetna may be able to provide cover to third country nationals or expatriates working in a sanctioned country for an employer located, and the plan issued, outside of the sanctioned country, but only for services rendered outside of the sanctioned country.
- If the employer has a valid written OFAC license authorizing its activity in the sanctioned country, Aetna may be able to provide cover to its employees working in that sanctioned country, including services rendered in the sanctioned country.
- Aetna is not permitted to provide cover to local nationals residing in a sanctioned country, but may be able to cover sanctioned country nationals (except Cuban nationals) residing outside of the sanctioned country, but only for services rendered outside of any sanctioned country. A Cuban national must prove that he/she has established a permanent residency in a non-sanctioned country in order for Aetna to cover.
- If Aetna is providing cover under an authorized license or sanction exemption as noted above, payments and

correspondence must go to an alternate address, such as an employer or a member's bank outside of the sanctioned country.

- The situations listed on the left must be reviewed and pre-approved by Aetna's Financial Sanctions Compliance Team.

Applicability of sanctions

These sanctions apply to our U.S. and non U.S. companies and, therefore, apply across all of Aetna's operations in the U.S. and around the world.

Cuba

Although the U.S. government signaled a significant policy shift for Cuba in December 2014, OFAC has not yet substantially changed the Cuba sanction rules as they relate to Aetna and other healthcare insurers. Aetna will continue to monitor changes in the regulations and will advise when our guidelines are revised.

Financial Sanctions Exclusions

If coverage provided by this policy violates or will violate any U.S., UN, or EU or other applicable economic or trade sanctions, the coverage is immediately considered invalid. For example, Aetna companies cannot make payments or reimburse for health care or other claims or services if it violates a financial sanction regulation. This includes sanctions related to a blocked person or entity, or a country under sanction by the United States, unless permitted under a valid written Office of Foreign Asset Control (OFAC) license. For more information on OFAC, visit <http://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>.

Annual Census

To ensure compliance with applicable country sanctions, we will be requiring a full census (including member name, date of birth, nationality, and residential and mailing addresses with city and country locations) from policyholders each year. This is an important step toward better monitoring member locations.

*This country list is subject to change based on changes in financial sanctions regulations. In addition, there are other countries subject to less broad sanctions than the countries/region listed here. For more information, visit <http://www.treasury.gov/resource-center/sanctions/Pages/default.aspx>.

Health insurance plans and programs are offered, underwritten or administered by Aetna Health Insurance Company of Europe, Limited, Aetna Life & Casualty (Bermuda) Ltd or Aetna Life Insurance Company (Aetna) and its subsidiary companies.

Information is believed to be accurate as of the production date; however, it is subject to change. For more information about Aetna International, refer to www.AetnaInternational.com.

www.aetnainternational.com

©2015 Aetna Inc.

