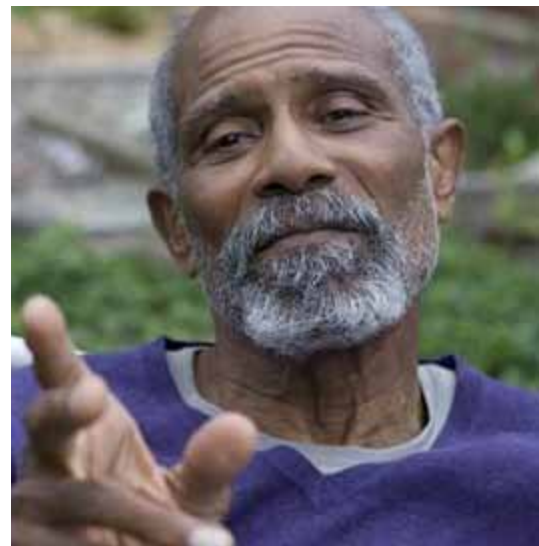
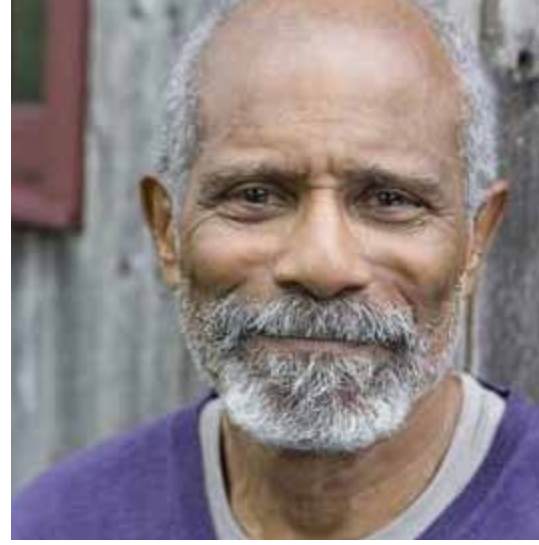


Aetna Medicare Code of Conduct



Aetna is proud to provide services to beneficiaries of the Medicare program through our Medicare Advantage and Prescription Drug Plan products.

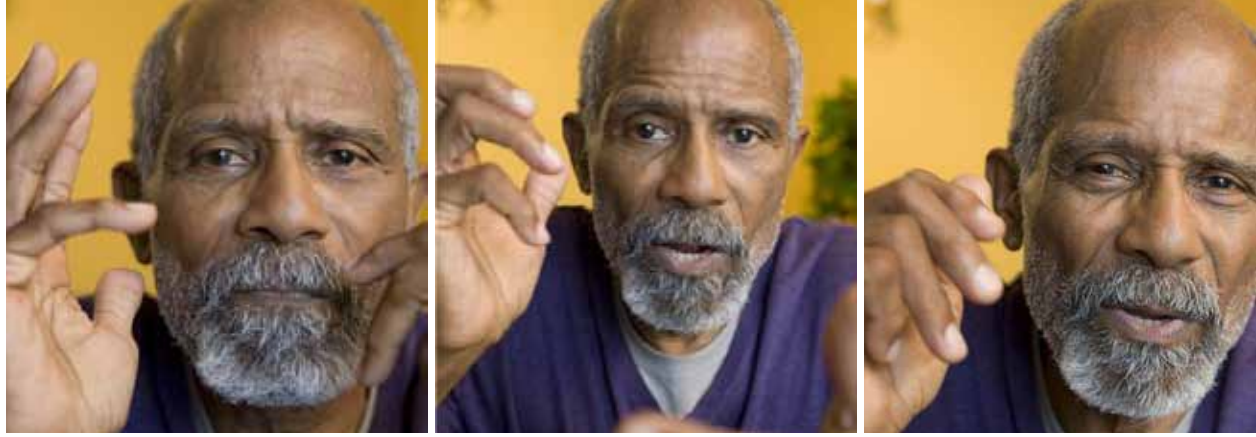
Aetna is proud to provide services to beneficiaries of the Medicare program through our Medicare Advantage and Prescription Drug Plan products. We value our relationship with each of our Medicare members and with the Centers for Medicare & Medicaid Services (CMS). Aetna is committed to providing services to Medicare beneficiaries and the Medicare program fully in accordance with Medicare program laws, regulations, policies, guidance and manuals.

Aetna has a corporate-wide Code of Conduct that outlines the values and standards that guide our business practices and day-to-day actions. The Aetna Code of Conduct may be viewed on the Aetna public website at www.aetna.com/investors-aetna/governance/code_of_conduct.html

All Aetna employees, suppliers and contractors must perform their Aetna responsibilities ethically and in compliance with the Code of Conduct, applicable laws and regulations, and Aetna policies.

In particular, Aetna requires all of its employees, suppliers and contractors who provide services to or on behalf of any of our Medicare members to comply with all of Aetna's policies and procedures that affect the Medicare business, as well as with all laws and regulations governing the Medicare program. **Copies of Aetna's Medicare policies and procedures and additional information about the Medicare program are made available to Aetna Medicare employees, suppliers and contractors.** Our Medicare policies and procedures undergo constant review to make sure they (i) remain current, (ii) comply with all CMS rules and guidance, and (iii) are readable and understandable. We will inform our Medicare employees, suppliers and contractors when new Aetna Medicare policies and procedures have been released.

All of our employees, suppliers and contractors who provide services to our Medicare members must take annual compliance training to familiarize themselves with Medicare rules and regulations. Failure to complete training, comply with this Medicare Code of Conduct, Aetna's Code of Conduct, any of Aetna's Medicare policies or procedures, or any Medicare law or regulation may subject an employee, supplier or contractor to disciplinary action, including termination.



If an Aetna Medicare employee, supplier or contractor becomes aware of a violation of the Medicare Code of Conduct, Aetna's Code of Conduct, the law or any Aetna policy, they are obligated to report it right away. Failure to report a violation promptly may subject an employee, supplier or contractor to disciplinary action, including termination.

Aetna Medicare employees may report compliance concerns in multiple ways. They may bring their concern to the attention of their supervisor, the assigned compliance officer for the business unit, Aetna's Medicare Compliance Officer, anyone in Medicare Compliance, Aetna's Chief Compliance Officer or the company's Office of the General Counsel.

Any Aetna supplier or contractor who has a concern about any aspect of their compliance with either of our two Codes of Conduct, Aetna Medicare policies or Medicare laws, regulations or manuals should immediately raise their concern to the Aetna Medicare Compliance Officer. They may contact the Medicare Compliance Officer by phone (**215-775-6801**) or e-mail MedicareCompliance@aetna.com.

Additionally, at any time, 24 hours a day, employees, suppliers or contractors may report compliance concerns to the toll-free Aetna AlertLine® at **1-888-891-8910**. Calls to AlertLine may be made anonymously.

Serving Medicare beneficiaries is an honor, and we expect our Aetna Medicare team to safeguard the trust they have conferred on us.



Aetna AlertLine®
1-888-891-8910