



HCA Healthcare Political Participation Overview



January 2022

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Engaging in the political process to advocate on behalf of our patients, colleagues, and organization is a key priority for HCA Healthcare. The ability to educate policymakers to ensure they understand the impact of proposed legislation and regulatory policies is fundamental to the success of the enterprise. Government Relations employs a number of tools to educate policymakers, including direct lobbying, joining together in trade associations and coalitions with other hospital companies and organizations, and political giving. These advocacy tools are conducted pursuant to our compliance protocols, consistent with our Company Code of Conduct, and in accordance with state and federal laws.

Our Company's Code of Conduct and Government Relations policies (GR.001, GR.002) provide guidance to help ensure our work is done in an ethical and legal manner. Government Relations assesses HCA Healthcare's compliance needs, updates our policies as needed and invests resources to ensure applicable standards are met. For 2021, we began the transition of the management of our political action committees (PACs) over to an enhanced PAC compliance, tracking and reporting software system. Among its many advantages, this is designed to ensure that fundraising is limited to eligible employees, disbursements are made within budget and approved frameworks, and we are compliant with applicable state and federal requirements.

Additional information regarding the applicable provisions of the Company's Code of Conduct, our policies and procedures regarding political giving, and our PAC, lobbying and trade association activities are set forth below.

Our political activities are also subject to oversight by our Board of Directors. The duties of our Nominating and Corporate Governance Committee, pursuant to its written charter, include reviewing and considering the Company's policies and practices regarding political and public policy activities, including political contributions and lobbying.

Lobbying Activity

Federal, state and local statutes and regulations (e.g. the Lobbying Disclosure Act, and Honest Leadership and Open Government Act) govern our corporate lobbying activities and require the Company and its representatives to disclose relevant advocacy activity to the public and abide by applicable gift and ethics rules governing engagement with public officials and employees. Outside legal counsel prepares and files required reports for our in-house federal lobbyists. All lobbying reports for external federal lobbyists are reviewed and approved by HCA Healthcare's Senior Vice President of Government Relations. All federal lobbying reports filed by HCA Healthcare are publicly available at <https://lobbyingdisclosure.house.gov>.

Lobbying reports for our state lobbyists are reviewed and approved by their Government Relations Director and filed in their respective states. State lobbying disclosure records are also generally available for public review via state government websites and online filing platforms managed by the state lobbying regulatory authority for each jurisdiction.

Trade Associations and Coalitions

HCA Healthcare supports trade associations and coalitions that represent a broad spectrum of views on industry and policy issues.

Below is a breakdown of dues paid by HCA to federal trade associations, coalitions and other tax-exempt organizations through the third quarter of 2021, and whose total dues exceed \$50,000, that, in each case, were allocated to non-deductible lobbying activity under the Internal Revenue Code. These associations represent those with which we have frequent interaction regarding regulatory and legislative activities.

Trade Association / Coalition	Non Deductible Lobbying (Q1-Q3)
American Hospital Association	\$264,607
Federation of American Hospitals	\$1,274,861
Partnership for America's Health Care Future	\$44,500
US Chamber of Commerce	\$275,000
American Medical Rehabilitation Providers Association	\$51,639
National Association for Home Care & Hospice	\$21,850
Healthcare Supply Chain Association	\$160,184
Total – 7 Federal Trade Associations & Coalitions	\$2,092,641

Political Contributions

HCA Healthcare sponsors a federal PAC – the HCA Healthcare Good Government Fund – which is a voluntary, non-partisan, separate segregated fund (SSF), regulated by the Federal Election Commission (FEC). A Board of Directors, composed of HCA Healthcare employees, oversees the operations of the PAC, and works closely with the HCA Healthcare Legal Department and HCA Healthcare Internal Audit Department to assure adherence of our PAC processes to applicable requirements. Our in-house PAC administrators attend yearly FEC conferences to learn of recent developments in campaign finance law and best practices for FEC filings and compliance.

Contributions to the HCA Healthcare Good Government Fund are strictly voluntary. Disbursements from the PAC are made to election committees of federal office candidates and other PACs. Disbursements can also be made to state candidates or other state PACs in states where it is permitted, and where HCA Healthcare does not operate an existing state PAC. Copies of monthly reports filed by the PAC with the FEC can be found at <https://www.fec.gov>.

HCA Healthcare does not make independent expenditures for federal candidates/officials.

HCA Healthcare operates 16 individual state PACs in 14 states where we have healthcare operations. Each of these state PACs has its own board of directors and operates in accordance with applicable state law, but each PAC, whether federal or state, operates under uniform bylaws. Where permissible, the state PACs are funded by corporate dollars.

All disbursements, receipts and reporting for HCA Healthcare's federal and state PACs are managed through an enhanced PAC compliance, tracking and reporting software system, which is designed to ensure that all contributions meet both federal and state compliance requirements and have the required authorization for approval.

HCA Healthcare's affiliated PACs are also subject to review by the Internal Audit Department after each Presidential election. These reports are shared with responsible Government Relations personnel and with HCA Healthcare's senior management team.

A list of all federal and state PAC contributions for the 2022 election cycle by HCA Healthcare can be found [here](#).