



HCA Healthcare Political Participation Overview
January 1, 2024 - June 30, 2024

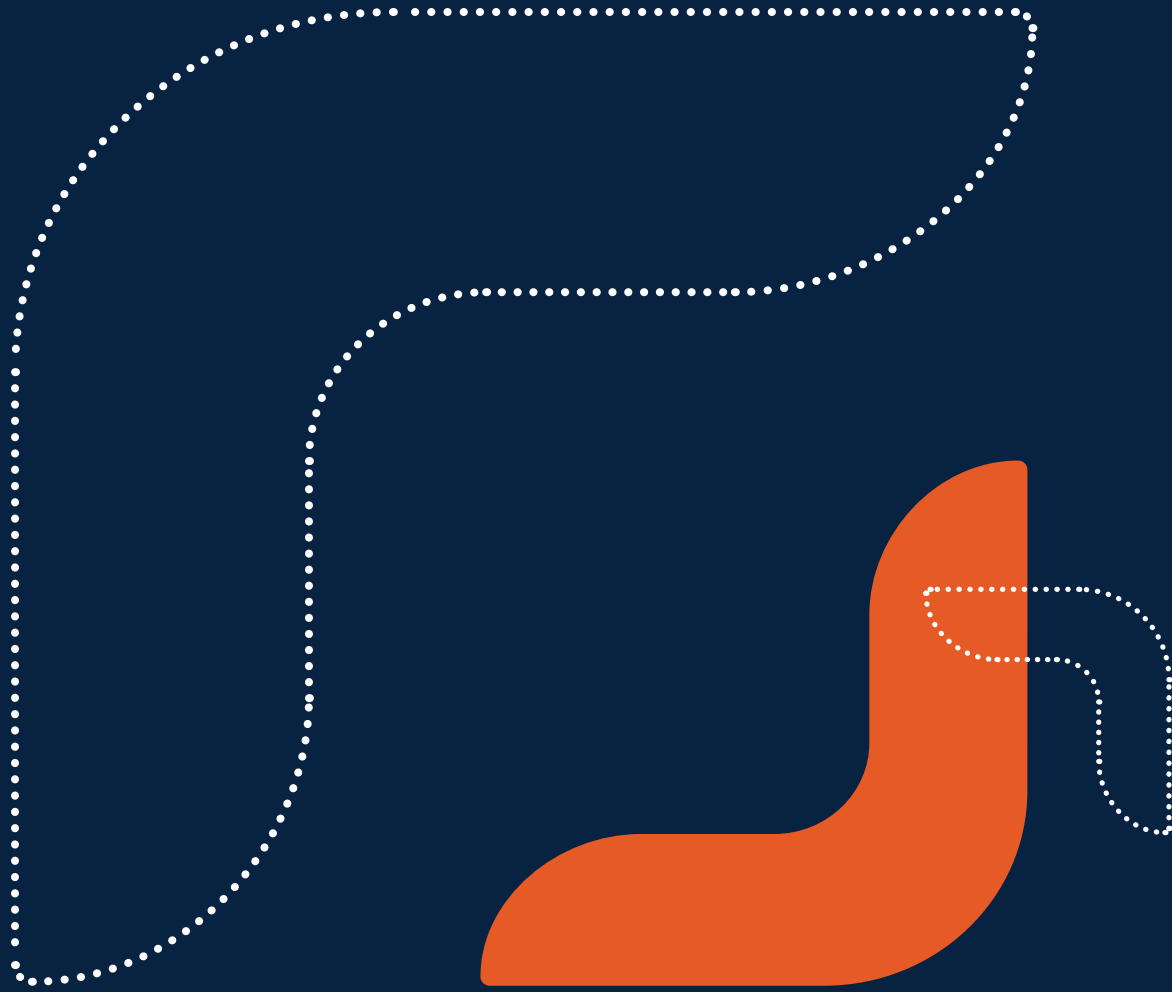


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HCA Healthcare political participation overview

HCA Healthcare participates in the political process to help educate policymakers, shape public policy, and address proposals and legislation that impact the patients and communities we serve. We are subject to extensive regulation at the federal, state, and local levels and are involved in a number of legislative initiatives across a broad spectrum of policy areas that can have a significant effect on the patients and communities we serve, our employees, and our business and operations. We ethically and constructively promote legislative and regulatory actions that further the objectives of HCA Healthcare, such as improving access and quality of care.

Government Relations employs a number of tools to educate policymakers, including direct lobbying and participation in trade associations and coalitions with other healthcare organizations. These advocacy tools are implemented pursuant to our compliance protocols, consistent with our Company's Code of Conduct, and in accordance with applicable federal and state 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 appropriate, and invests resources to ensure applicable standards are met. Additional information regarding the applicable provisions of the Company's Code of Conduct; our policies and procedures regarding political giving; and our political action committee (PAC), lobbying, and trade association activities is set forth below.

HCA Healthcare's Senior Vice President (SVP) - Government Relations has final authority over HCA Healthcare's political spending decisions. Our Government Relations team, which reports to our SVP - Government Relations, oversees regulatory matters and government affairs, including our direct and indirect advocacy and political contributions in the United States at the federal, state, and local levels.

Our political activities are also subject to oversight by our Board of Directors. The duties of our Nominating and Corporate Governance Committee (comprised solely of independent directors), pursuant to its written charter, include reviewing and considering the Company's policies and practices regarding political activities, including political contributions and lobbying. The Board reviews periodic reports of the Company's political expenditures prepared by the SVP - Government Relations.

HCA Healthcare publishes and archives on our website semi-annual reports regarding political contributions and related activity.

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. Lobbying reports for external federal lobbyists are reviewed by HCA Healthcare's SVP - Government Relations. Federal lobbying reports filed by HCA Healthcare are publicly available at lobbyingdisclosure.house.gov.

Lobbying reports for our state lobbyists are reviewed and approved by the state's respective Government Relations Director and filed in the respective state. 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. Links to state lobbying reports filed by HCA Healthcare state lobbyists can be viewed online at HCAhealthcare.com/LobbyingReports.

Trade associations

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

Lobbying and maintaining memberships in trade associations are important parts of participating effectively in the political process. We believe the associations in which we participate take positions and address policy issues in a collective industry manner and often advance positions consistent with HCA Healthcare's interests. However, participation in the political process and as a member of various trade associations comes with the understanding that we may not always agree with all of the positions of the organizations in which we participate, the other members of those organizations, and the stakeholders and policymakers with whom those organizations communicate.

Below is a breakdown of dues in excess of \$25,000 paid by HCA Healthcare and its affiliates to trade associations between January 1, 2024 and June 30, 2024. The total shown represents the amount that was allocated to non-deductible lobbying activity under the Internal Revenue Code.

Trade association	Leadership representation	Non-deductible lobbying Jan 1 - June 30, 2024
Federation of American Hospitals	Immediate Past Chairman Board of Directors Board of Governors Policy Committees	\$1,074,848
Healthcare Supply Chain Association	Board of Directors Public Policy Committee	\$73,579
Ambulatory Surgery Center Association		\$40,793
American Medical Association		\$27,246
Total		\$1,216,466

527 political organizations

Below is a list of 527 political organizations to which HCA Healthcare and its affiliates made contributions between January 1, 2024 and June 30, 2024.

527 political organization	Contributions Jan 1 - June 30, 2024
Republican Attorneys General Association	\$60,000
Democratic Governors Association	\$25,000
Total	\$85,000

Political contributions overview

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). Our in-house PAC administrators attend periodic 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 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 www.fec.gov.

HCA Healthcare participates in the political process by contributing to state and local candidates, political party committees, political committees, and other political organizations. HCA Healthcare’s political contributions and expenditures are made to promote the Company’s interests and without regard to the personal political preferences of individual HCA Healthcare board members, officers, and employees. Decisions regarding political contributions are based on a number of factors, such as our belief that the recipient shares our commitment to improving patient access to timely and high quality healthcare, expanding the availability of healthcare coverage, ensuring appropriate Medicare and Medicaid reimbursement levels, and promoting nurse and physician education.

HCA Healthcare does not make independent expenditures in connection with federal elections. HCA Healthcare operates 15 individual state PACs in 13 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 local HCA Healthcare facilities and affiliates.

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 receive the required approval authorization.

HCA Healthcare’s affiliated PACs are also subject to review by the Internal Audit Department after each federal election to ensure compliance with laws and HCA Healthcare policies. These reports are shared with responsible Government Relations personnel and with HCA Healthcare’s senior management team.

HCA Healthcare abides by applicable federal, state, and local laws concerning contribution disclosure for any political candidates, parties, and committees. A chart reflecting all corporate contributions made by HCA Healthcare and its affiliates to political candidates, parties, and committees between January 1, 2024 and June 30, 2024 is included below. Separate lists of all such contributions by the HCA Healthcare Good Government Fund and HCA Healthcare’s affiliated state PACs for the same time period are also included.

HCA Healthcare Good Government Fund federal contributions to federal candidate committees (Jan 1 - June 30, 2024)

State	Recipient	Amount
Kansas	Rep. Ron Estes (R)	\$2,500
Massachusetts	Rep. Richard Edmund Neal (D)	\$5,000
Minnesota	Rep. Thomas Earl Emmer, Jr. (R)	\$2,500
Nevada	Rep. Suzanne Lee (D)	\$2,500
	Rep. Alice C. Dina Titus (D)	\$2,500
	Rep. Steven Alexzander Horsford (D)	\$2,500
New Mexico	Sen. Martin Heinrich (D)	\$2,500
Utah	Sen. Michael S. Kennedy (R)	\$1,500
Virginia	Rep. Robert Cortez Scott (D)	\$2,500
	Sen. Mark Robert Warner (D)	\$2,500
West Virginia	Rep. Carol Devine Miller (R)	\$2,500
Total HCA Healthcare Good Government Fund contributions to federal candidate committees (Jan 1 - June 30, 2024)		\$29,000

HCA Healthcare Good Government Fund contributions to federal leadership PACs and party committees, and other federal committees (Jan 1 - June 30, 2024)

Committee	Amount
American Hospital Association PAC	\$5,000
Blackburn Tennessee Victory Fund	\$10,000
Common Ground PAC	\$5,000
Delivers PAC	\$2,500
Democratic Congressional Campaign Committee (DCCC)	\$5,000
Expect More Leadership PAC	\$5,000
Federation Of American Hospitals PAC	\$5,000
Freedom Fund	\$5,000
Grow The Majority	\$10,000
Kaine Victory Fund	\$5,000
Kentucky Hospital Association Political Action Committee (Fed PAC)	\$2,500
Making A Responsible Stand For Households In America PAC	\$5,000
National Association For Behavioral Healthcare PAC (NABH CHAMPIONS PAC)	\$5,000
National Republican Congressional Committee (NRCC)	\$10,000
Senate Eagle PAC	\$3,500
Tennessee Republican Party Federal Election Account	\$5,000
Total HCA Healthcare Good Government Fund contributions to federal leadership PACs and party committees, and other federal committees (Jan 1 - June 30, 2024)	\$88,500
Total HCA Healthcare Good Government Fund federal contributions (Jan 1 - June 30, 2024)	\$117,500

HCA Healthcare Good Government Fund contributions to state candidates, state party committees and state PACs by state (Jan 1 - June 30, 2024)

State	Recipient	Amount
North Carolina	North Carolina Hospital Association PAC	\$6,400
Total HCA Healthcare Good Government Fund contributions to state candidates, state party committees and state PACs (Jan 1 - June 30, 2024)		\$6,400
<i>Total HCA Healthcare Good Government Fund contributions to federal and state candidate committees, federal leadership PACs, federal and state party committees, and other federal and state PACs (Jan 1 - June 30, 2024)</i>		\$123,900

HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)

State	Recipient	Amount
Florida HCA East Florida Division Good Government PAC	A Stronger Florida	\$11,667
	Anthony Aguirre (R)	\$1,000
	Associated Industries of Florida for Economic Growth	\$24,417
	Associated Industries of Florida for Free Enterprise	\$91,084
	Rep. Dean A. Black (R)	\$1,000
	Ed Montanari (R)	\$1,000
Florida HCA North Florida Division Good Government PAC	A Stronger Florida	\$11,667
	Associated Industries of Florida for Economic Growth	\$24,417
	Associated Industries of Florida for Free Enterprise	\$24,417
	Anthony Aguirre (R)	\$1,000
	Rep. Webster Barnaby (R)	\$1,000
	Rep. Demi Busatta Cabrera (R)	\$1,000
	Rep. Linda Chaney (R)	\$1,000
	Rep. Tom Fabricio (R)	\$1,000
	Rep. Mike Giallombardo (R)	\$1,000
	Rep. Fiona McFarland (R)	\$1,000
	Rep. Lauren Uhlich Melo (R)	\$1,000
	Ed Montanari (R)	\$1,000
	Rep. James Vernon Mooney (R)	\$1,000
	Rep. Jenna D. Persons-Mulicka (R)	\$1,000
	Rep. Joel Rudman (R)	\$1,000
	Rep. Jason S. Shoaf (R)	\$1,000
	Rep. John Snyder (R)	\$1,000
	Rep. Dana Lee Trabulsy (R)	\$1,000
Rep. Kaylee Tuck (R)	\$1,000	
Noah Walker (N)	\$500	
Florida HCA West Florida Division Good Government PAC	A Stronger Florida	\$11,667
	Anthony Aguirre (R)	\$1,000
	Associated Industries of Florida for Economic Growth	\$24,417
	Associated Industries of Florida for Free Enterprise	\$24,417

HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)

State	Recipient	Amount
Georgia HCA/Georgia PAC	Georgia House Republican Trust, Inc.	\$25,000
	Georgia Republican Senatorial Committee Inc.	\$25,000
Idaho HCA Idaho Good Government Fund	Jeff C. Agenbroad (R)	\$250
	Sen. Kelly Arthur Anthon (R)	\$500
	Hon. Scott C. Bedke (R)	\$2,500
	Sen. Carl J. Bjerke (R)	\$250
	Rep. Megan C. Blanksma (R)	\$500
	Rep. Matthew Bundy (R)	\$250
	Sen. Van T. Burtenshaw (R)	\$250
	Sarah Chaney (R)	\$250
	Sen. Kevin Cook (R)	\$250
	Rep. Jeff J. Cornilles (R)	\$250
	Rep. Brent J. Crane (R)	\$250
	Rep. Jaron Crane (R)	\$250
	Rep. Chenele Dixon (R)	\$250
	Rep. Jeff Ehlers (R)	\$250
	Rep. Marco Adam Erickson (R)	\$250
	Rep. Rodney G. Furniss (R)	\$250
	Rep. Brooke Green (D)	\$250
	Sen. C. Scott Grow (R)	\$500
	Sen. Jim Guthrie (R)	\$250
	Rep. Clay Handy (R)	\$250
	Sen. Mark R. Harris (R)	\$500
	Rep. Dori Healey (R)	\$250
	Rep. Wendy Horman (R)	\$500
	Sen. Dave Lent (R)	\$250
	Gov. Brad Little (R)	\$5,000
	Rep. Dustin Whitney Manwaring (R)	\$250
	Rep. Chris Mathias (D)	\$250
	Rep. Stephanie Jo Mickelsen (R)	\$250
	Rep. Steven Miller (R)	\$250
	Rep. Jason A. Monks (R)	\$500
Rep. Mike Moyle (R)	\$500	
Rep. James Petzke (R)	\$250	

HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)

State	Recipient	Amount
Idaho HCA Idaho Good Government Fund (Continued)	Rep. Britt Raybould (R)	\$250
	Rep. Jordan Redman (R)	\$250
	Rep. Ilana S. Rubel (D)	\$250
	Sen. James D. Ruchti (D)	\$250
	John Shirts (R)	\$250
	Scott Syme (R)	\$250
	Sen. Julie VanOrden (R)	\$500
	Sen. Janie Ward-Engelking (D)	\$250
	Rep. Josh Wheeler (R)	\$250
	Sen. Chuck Winder (R)	\$500
	Sen. Melissa Wintrow (D)	\$250
	Jim Woodward (R)	\$250
	Rep. John Vander Woude (R)	\$500
	Rep. Kenny Wroten (R)	\$250
	Rep. Julie Yamamoto (R)	\$250
Nevada HCA Nevada Good Government Fund	Assembly Republican Caucus	\$1,000
	Assm. Shea Backus (D)	\$2,500
	April Becker (R)	\$4,000
	Assm. Tracy Brown-May (D)	\$2,500
	Sen. Nicole Jeanette Cannizzaro (D)	\$5,000
	Lisa Cole (R)	\$5,000
	Hon. Zachary Beare Conine (D)	\$2,000
	Michelee Crawford (D)	\$1,000
	Joe Dalia (D)	\$1,000
	Rebecca Edgeworth (R)	\$5,000
	John Ellison (R)	\$1,000
	Assm. Danielle Gallant (R)	\$2,000
	Assm. Sandra Jauregui (D)	\$5,000
	Venise Karris (D)	\$1,000
	Assm. Heidi Wathne Kasama (R)	\$2,500
	Las Vegas Chamber of Commerce BizPac Fund	\$5,000
	Sen. Roberta Ann Lange (D)	\$2,500
	Gov. Joe Lombardo (R)	\$15,000
Assm. Elaine H. Marzola (D)	\$3,000	

HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)

State	Recipient	Amount
Nevada HCA Nevada Good Government Fund (Continued)	Mishon Montgomery (D)	\$1,000
	Michael Naft (D)	\$2,500
	Assm. Philip O'Neill (R)	\$3,000
	John Steinbeck (R)	\$3,000
	Angie Taylor (D)	\$1,000
	Sen. Robin L. Titus, M.D. (R)	\$10,000
	Assm. Selena E. Torres (D)	\$5,000
	Alex Velto (D)	\$1,000
	Assm. Thaddeus Joseph Yurek (R)	\$2,000
New Hampshire HCA New Hampshire Fund	Sen. Daryl A. Abbas (R)	\$1,000
	Sen. Regina M. Birdsell (R)	\$1,000
	Sen. Sharon M. Carson (R)	\$1,000
	Sen. William M. Gannon (R)	\$1,000
	Sen. James P. Gray (R)	\$1,000
	Hon. Joseph D. Kenney (R)	\$1,000
	Sen. Rebecca Perkins Kwoka (D)	\$1,000
	Sen. Donna M. Soucy (D)	\$1,000
	Hon. Janet L. Stevens (R)	\$1,000
	Sen. David H. Watters (D)	\$1,000
South Carolina HCA Good Government Fund of SC	Rep. Bruce W. Bannister (R)	\$1,000
	Rep. William G. Herbkersman (R)	\$1,000
	South Carolina House Republican Caucus	\$25,000
	South Carolina Senate Democratic Caucus	\$5,000
	South Carolina Senate Republican Caucus	\$25,000
	Sen. Katrina Frye Shealy (R)	\$1,000
Tennessee HCA TriStar Fund	Sen. Heidi Campbell (D)	\$1,500
	Rep. Elaine Davis (R)	\$1,000
	Rep. Vincent Dixie (D)	\$1,500
	Rep. Jeremy Faison (R)	\$5,000
	Rep. Bob Freeman (D)	\$1,500
	Friends of THA PAC	\$1,000

HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)

Tennessee HCA TriStar Fund (Continued)	Rep. Rusty Grills (R)	\$1,000
	Sen. Ferrell Haile (R)	\$2,500
	Harris Frazier Government Relations PAC	\$60,000
	Rep. David B. Hawk (R)	\$5,000
	Rep. Patsy Hazlewood (R)	\$5,000
	Rep. Esther Helton-Haynes (R)	\$5,000
	Rep. Tim Hicks (R)	\$5,000
	Rep. Timothy Hill (R)	\$5,000
	Sen. Jack Johnson (R)	\$10,000
	Rep. William G. Lamberth (R)	\$5,000
	Rep. Mary J. Littleton (R)	\$5,000
	Sen. Jon C. Lundberg (R)	\$2,500
	Sen. Becky Duncan Massey (R)	\$5,000
	Sen. Frank S. Niceley (R)	\$5,000
	Rep. John D. Ragan (R)	\$1,000
	Rep. Tim Rudd (R)	\$5,000
	Rep. Iris Rudder (R)	\$1,000
	Rep. Paul Sherrell (R)	\$2,500
	Rep. Robert Stevens (R)	\$1,000
	Tennessee Chamber of Commerce and Industry PAC	\$20,000
	Tennessee Democratic Party (non-federal account)	\$5,000
	Tennessee House Republican Caucus	\$50,000
	Tennessee Republican Party (non-federal account)	\$10,000
	Rep. Christopher Todd (R)	\$1,000
Sen. Bo Watson (R)	\$10,000	
Sen. Ken Yager (R)	\$10,000	
Rep. Jason Zachary (R)	\$2,000	
Texas HCA Texas Good Government Fund	Hatch Smith (R)	\$1,000
Virginia HCA for Good Government	Del. Betsy B. Carr (D)	\$1,000
	Del. Mike A. Cherry (R)	\$1,500
	Commonwealth Victory Fund	\$5,000
	Sen. Tara A. Durant (R)	\$1,500

HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)

Virginia HCA for Good Government (Continued)	Sen. Barbara A. Favola (D)	\$1,500
	Del. Hyland F. Fowler, Jr. (R)	\$1,000
	Sen. Christopher T. Head (R)	\$1,000
	HosPAC	\$10,000
	House Republican Campaign Committee, Inc.	\$7,500
	Sen. Ryan T. McDougale (R)	\$2,500
	Sen. Mark J. Peake (R)	\$1,000
	Del. Mark D. Sickles (D)	\$1,000
	Del. Kannan Srinivasan (D)	\$500
	Sen. Richard H. Stuart (R)	\$2,500
	Sen. Glen H. Sturtevant, Jr. (R)	\$2,500
	Sen. Schuyler T. VanValkenburg (D)	\$1,000
	Del. R. Lee Ware, Jr. (R)	\$1,000
Total HCA Healthcare affiliated state PAC contributions (Jan 1 - June 30, 2024)		\$796,668

HCA Healthcare and affiliates contributions to state candidates, committees and state PACs by state (Jan 1 - June 30, 2024)

State	Recipient	Amount
Colorado	The Colorado Democratic Party	\$1,000
Florida	HCA East Florida Good Government PAC	\$350,000
	HCA North Florida Good Government PAC	\$375,000
	HCA West Florida Good Government PAC	\$562,500
Idaho	HCA Idaho Good Government Fund	\$25,000
Nevada	HCA Nevada Good Government Fund	\$275,000
	Nevada Latino Legislative Caucus	\$10,000
New Hampshire	HCA New Hampshire Good Government Fund	\$10,000
	NH Senate Republicans	\$2,500
	NH Senate Democrats	\$2,500
	NH House Democratic Victory	\$1,250
	NH Committee to Elect House Republicans	\$1,000
	Friends of Jeb Bradley for State Senate	\$2,000
South Carolina	HCA Good Government Fund of SC	\$82,500
Tennessee	HCA TriStar Fund	\$588,500
Virginia	HCA for Good Government	\$165,000
<i>Total HCA Healthcare and affiliates contributions to state candidates, committees, and state PACs (Jan 1 - June 30, 2024)</i>		<i>\$2,453,750</i>



