

HCA Healthcare Social Media Guidelines

These social media guidelines apply to Company-authorized users of social media, as well as Company colleagues' personal use of social media. For purposes of these guidelines, "Company" refers to HCA Healthcare, Inc. and its affiliated entities, including direct and indirect subsidiaries and partnerships, joint ventures and other entities in which subsidiaries have an ownership interest. "Colleagues" refers to persons who are employed by any Company entity. Individuals seeking to engage in social media activity must adhere to these guidelines as well as the Company's Appropriate Use of Communications Resources and Systems Policy, [EC.026](#).

General Provisions

Blogging and other forms of social networking include but are not limited to video or wiki postings, Reddit, sites such as Facebook, Instagram, Twitter, and YouTube, chat rooms, personal blogs or other similar forms of online journals, and diaries or personal newsletters.

Unless specifically authorized, colleagues are restricted from speaking on behalf of the Company. Colleagues are expected to protect the privacy of patients, colleagues and other stakeholders and are prohibited from disclosing patient information without proper authorization. Colleagues are also prohibited from disclosing proprietary or confidential information to which they have access and work with as part of their job duties, without proper authorization.

Monitoring

Colleagues are reminded that they should have no expectation of privacy while posting information to social networking sites. Postings often can be reviewed by anyone, including the Company. As described in [EC.026](#), the Company reserves the right to use content management and social media listening tools to monitor comments or discussions about the Company, its colleagues, its patients and the industry posted on the Internet. Further, colleagues should understand that the Company may respond to such comments or discussions, and that response may occur online, or, in certain circumstances, may occur offline and may include discipline where appropriate.

Reporting and Discipline for Violations

1. Reporting Violations. HCA Healthcare and its affiliates strongly urge colleagues to report any violations or possible or perceived violations to supervisors, managers or the HR department, to the Facility Privacy Official or Ethics & Compliance Officer (if patient information is involved) or to the Ethics Line (1-800-455-1996).
2. Discipline. HCA Healthcare and/or its affiliates investigate and respond to reports of violations of EC.026, these Social Media Guidelines and other related policies. Violations may result in disciplinary action. Managers may not restrict a colleague's access or take

any disciplinary action based on a colleague's use of social media without first consulting with their Human Resources VP and HCA Healthcare Employee Relations.

Company-Authorized Use of Social Media

The goal of authorized social media is to enhance the exchange of information between the Company and its constituents in order to drive business results and support our long-term success. Authorized use of social networking media is purposeful in conveying information about Company services, promoting and raising awareness of the Company, communicating with colleagues, patients, candidates, business associates and the media, and discussing activities and events.

When colleagues are engaged in authorized social networking, blogging or using other forums, the Company must ensure that use of these communications is consistent with and supports the Company's mission and values, and maintains the Company's brand identity, integrity and reputation while minimizing risks inside or outside the workplace.

The following rules and guidelines apply to social networking when expressly authorized by the Company.

Authorized social media channels. Colleagues, business units and departments are prohibited from creating internal and external (public-facing), HCA Healthcare or affiliate-named social media accounts, without prior authorization. The marketing department or equivalent and senior management are permitted to remove or request the removal of social media pages that are not authorized.

Content. Only authorized colleagues can prepare and modify content for Company-sponsored blogs and/or Company-authorized social networking entries. Content must be relevant, add value and meet at least one of the specified goals or purposes developed by the Company. If uncertain about any information, material or conversation, discuss the content with your manager and/or your organization's marketing director or equivalent.

Unauthorized Content. Business units and departments are responsible for ensuring all blogging and social networking information complies with the written policies of the Company. The Marketing Department or equivalent and senior management are authorized to remove any content that does not meet the rules and guidelines of this policy or that may be illegal or offensive. Removal of such content may be done without permission of the poster or without advance warning. Contact your Marketing Department or equivalent or follow the chain of command to report unauthorized or questionable content.

Copyright. Copyrighted content cannot be posted on any HCA Healthcare-affiliated blog or social media channel without first obtaining written permission from the copyright owner.

Guest Bloggers/Posters. The Company expects all guest bloggers and posters to abide by these guidelines. The Company reserves the right to remove, without advance notice or permission, all guest bloggers' and posters' content considered

inaccurate or offensive. The Company also reserves the right to take legal action against guests who engage in prohibited or unlawful conduct.

Media. If contacted by the media or press about a post that relates to the business of the Company, colleagues are required to speak with their manager and the Company's Marketing and Corporate Affairs Department before responding in any capacity that could be viewed as a spokesperson for the Company.

Personal Use of Social Media When on Working Time or Using a Company-Provided Device

Colleagues may occasionally access and engage with social media even when on working time and/or by means of a Company-provided device. While such access does not require express authorization, it should be infrequent and brief; must not interfere with or detract from a colleague's responsible performance of his or her job duties. Any postings or communications by a colleague during working time or using a Company provided device must not be inconsistent with the business interests of the Company; must not disclose protected patient information or confidential Company information; must not be malicious, defamatory, obscene, threatening; and must not be the sort of communication that would reflect negatively on the Company if the audience were to conclude that it was an official Company communication.

A colleague who chooses to engage in personal use of social media when on working time or using a Company-provided device must understand that, because the Company is facilitating their use of social media, the Company may monitor any and all such use and may discipline the employee for social media use that violates these guidelines. By way of example only, a colleague would likely be disciplined (and possibly terminated) for using social media to make threats against others, to express racist opinions, to use obscene language, or to make derogatory or disrespectful comments about persons or organizations while on working time or using a Company-provided device.

Personal Use of Social Media When On Personal Time and Using Personal Devices

The Company respects the right of colleagues to participate in blogs and use social networking sites when using their own devices during non-working hours and does not discourage self-publishing or self-expression. Colleagues are expected to follow these guidelines and policies to provide a clear distinction between you as an individual and you as an HCA Healthcare colleague.

Personal Responsibility. You are personally responsible for your commentary on social media. You can be held personally liable for commentary that is considered defamatory, obscene, proprietary or libelous by any offended party, not just the Company.

Be Respectful. If you have identified yourself as a colleague of the Company, you should not use blogs or social networking sites to post items that could be viewed as malicious, obscene, threatening, harassing, or bullying. Prohibited threatening, harassing, and bullying conduct includes offensive posts meant to intentionally harm someone's reputation or posts that discriminate or could contribute to a hostile work environment on the basis of age, race, color, gender, disability, religion, protected veteran status, national origin, sexual orientation, gender identity, or genetic information.

Disclaimer. When you identify yourself as a colleague of the Company, some readers may view you as a spokesperson for the Company. Because of this possibility, you should state in the description or "about" section of any public profile that the views expressed by you through social media are your own and not those of the Company. Because colleagues may not represent that their views are those of the Company, colleagues are not permitted to post on personal blogs or other sites the trademark or logo of the Company.

Privileged or Confidential Information. Colleagues are not permitted to post Company-privileged information, including copyrighted information or patient protected health information. Colleagues who have access to and work with confidential information as part of their job duties, cannot disclose or post such information without proper authorization.

Workplace photographs. Colleagues must follow the Company's policy regarding photos taken in the workplace. No photos showing patients or family members, or showing protected health information, may be posted at any time. You should ask permission before posting photos of co-workers. Be mindful of public perception and use good taste when posting workplace photos.

Advertising. Except as authorized or requested by HCA Healthcare or an affiliate, colleagues may not post on personal blogs and social networking sites any advertisements or photographs of Company products, nor sell Company products and services.

Endorsements. HCA Healthcare and its affiliates do not endorse people, products, services or organizations. Official accounts should not be used to provide such endorsements. For personal social media accounts where your connection to HCA Healthcare is apparent, you should be careful to avoid implying that an endorsement of a person or product is on behalf of HCA Healthcare rather than a personal endorsement. As an example, LinkedIn users may endorse individuals or companies, but may not use HCA Healthcare's name or its affiliates' names in connection with the endorsement, state or imply that the endorsement is on behalf of HCA Healthcare or its affiliates, or state specifically that the endorsement is based on work done at HCA Healthcare or its affiliates.

Branding. Your social media name, handle or URL should not include HCA Healthcare or your affiliated employer's name or logo.

Managers and Supervisors. HCA Healthcare discourages staff in management/supervisory roles from initiating and/or accepting “friend” requests or follows from or with colleagues who report to them.

Patient communication. Do not use your personal social media account to discuss or communicate patient information with one of your patients, even if the patient initiated the contact or communication. Always use Company-approved communication methods when communicating with patients about their health or treatment.

Privacy and Security. Consult the Information Protection site on Atlas for social media privacy and security tips.

If you have any questions relating to these guidelines, a personal blog or social networking, ask your supervisor, another member of management, your HR Business Partner, Marketing/Communications Director, Ethics and Compliance Officer or Facility Information Security Officer. You can also submit inquiries to social@hcahealthcare.com