

HCA Healthcare Digital Media Guidelines

Individuals seeking to engage in Digital Media activity must adhere to these Guidelines as well as the Company's Appropriate Use of Communications Resources and Systems Policy, [EC.026](#).

These HCA Healthcare Digital Media Guidelines ("Guidelines") set forth standards for Colleague engagement with Digital Media whether on behalf of the Company (in the scope of such Colleague's official duties, referred to as "Company Digital Media") or in a Colleague's personal capacity (such as personal Digital Media usage).

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 employed by the Company.
- "Digital Media" refers to any and all digital technology, platform and/or practice (both now existing or existing in the future) that enables people to use, create, share, or otherwise interact or engage with content, individuals, communities, opinions, insights, and/or conversations over the internet.

Nothing in these Guidelines is intended to interfere with, restrict, restrain or prevent employee communications regarding wages, hours or other terms and conditions of employment.

Questions? If you have any questions relating to these Guidelines, ask your supervisor, another member of management, your HR business partner, marketing and corporate affairs department, ethics and compliance officer or facility information security officer. You may also submit inquiries to corp.digitalmedia@hcahealthcare.com.

I. Overview

Digital Media include, but are not limited to, and may be generally categorized for the purpose of these Guidelines as follows:

- **External Company Digital Media**, including, but not limited to, Company-owned, Company-authorized, or Company-branded websites, social media sites and/or accounts (such as Facebook, Instagram, Twitter, LinkedIn, and YouTube), conference and/or event sites or apps, blogs and native mobile applications;
- **Internal Company Digital Media**, including, but not limited to, Company-owned intranet, internal blogs and message boards; and
- **Colleague Digital Media**, including, but not limited to, personal use by a Colleague of video or wiki postings, Reddit, social media sites and/or accounts (such as Facebook, Instagram, Twitter, LinkedIn, TikTok, and YouTube), conference and/or event sites or apps, chat rooms, personal blogs, rating and review sites, or online publications, journals, diaries and/or personal newsletters (including commenting or other interactive features or sections).

The goal for the use of Company Digital Media, whether external or internal, is to enhance the exchange of information between the Company and its stakeholders in order to best support the Company's mission and brand. Authorized use of Company Digital Media sites is purposeful in conveying information about Company services, promoting and raising awareness of the Company, communicating with Colleagues as well as discussing activities and events.

Content and comments from Colleagues on Digital Media must reflect the Company's commitment to ensuring a safe, healthy, respectful, equitable and inclusive environment for Colleagues to work and thrive. All information shared on Company Digital Media must be written in courteous and professional language. Content and comments that may be seen as discriminatory, racist, offensive, obscene, malicious, inflammatory, defamatory, threatening, unlawful, or that contain blatant partisan political views or explicit commercial endorsements – or, are otherwise a violation of the Company's workplace policies against discrimination and harassment – are prohibited.

II. General Provisions for Company Digital Media

Unless specifically authorized, Colleagues are restricted from speaking on behalf of the Company on Digital Media – regardless of whether via Colleague Digital Media or Company Digital Media. Colleagues are expected to protect the privacy of patients, and are prohibited from disclosing patient information without proper authorization. Colleagues are also prohibited from disclosing private information about other Colleagues and stakeholders and proprietary or

confidential information to which they may have access and work with as part of their job duties, without proper authorization.

When Colleagues are engaged in the authorized use of Company Digital Media, the Company must ensure 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 Company Digital Media.

Authorized Digital Media. Colleagues, business units and departments are prohibited from creating Internal Company Digital Media without prior authorization by facility senior management or External Company Digital Media without prior authorization by the marketing and corporate affairs department (External Company Digital Media). The marketing and corporate affairs department and facility senior management are permitted to remove or request the removal of Digital Media pages that are not authorized.

Content. Only authorized Colleagues may prepare and modify content for Company-sponsored posts and/or Company-authorized Digital Media entries. Content must be relevant, add value and meet specified goals or purposes pre-defined and approved by the Company in each instance. If Colleagues are uncertain about any information, material or conversation, Colleagues should discuss the content with their manager and/or organization's marketing and corporate affairs department.

Unauthorized content. Business unit and department managers will have access and be responsible for ensuring all content posted to their unit's and department's Company Digital Media complies with Company policies and supports the Company's mission and brand. The marketing and corporate affairs department and facility senior management are authorized to remove any content that does not meet the rules and guidelines of Company policy. Removal of such content may be done without permission of the poster or without advance warning. Colleagues should consult their manager and/or their organization's marketing and corporate affairs department, or follow the chain of command to report questionable content.

Internal use only. In some cases, the Company may classify certain information as "confidential," "proprietary," or otherwise for internal use only when discussing business performance, strategy, business plans, corporate transactions, potential or existing litigation and other legal matters, etc. This designation helps guide what topics may be discussed on external sites – including social media accounts – and what is discussed internally or with a select group of individuals with a need to know. Information designated shall not be shared externally. The Company is subject to strict securities and disclosure laws and regulations on how, what and when information about the Company may be communicated to the public. Inadvertent violations of these laws and

regulations can lead to serious consequences for the Company and for Colleagues. Refer to the Company's Securities Trading policy ([LL.SEC.001](#)) and Corporate Disclosure Policy ([LL.SEC.002](#)) for more information.

Copyright. Copyrighted content, logos, taglines/slogans, or trademarks cannot be posted on any Company Digital Media without first obtaining written permission from the copyright or trademark owner, and must otherwise comply with the Company's Copyright ([LL.GEN.002](#)) and/or Trademark ([LL.IP.001](#)) policies.

Guest bloggers/posters. The Company expects all internal and external guest bloggers and posters to abide by these Guidelines. External guest blogging — also known as guest posting — is the practice of contributing to another person's or company's blog. The Company reserves the right to take legal action against internal and external guest bloggers and posters who engage in prohibited or unlawful conduct. For Company-owned digital media properties, the Company reserves the right to remove, without advance notice or permission and in its sole discretion, any guest blogger's or poster's content and comments considered inaccurate, offensive, or otherwise prohibited by Company policy.

Media. If contacted by the media or press about a post that relates to Company business, Colleagues are required to speak with their manager and the Company's marketing and corporate affairs department before responding in any capacity.

III. Personal Use of Colleague Digital Media When on Working Time or Using a Company-Provided Device

Colleagues may occasionally access and engage with Digital 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, and must not interfere with or detract from a Colleague's responsible performance of his or her job duties. Any Digital Media use by a Colleague during working time or using a Company-provided device must be consistent with the business interests of the Company; must not disclose patient information or confidential, proprietary, or otherwise sensitive Company information; must not be malicious, defamatory, obscene or threatening; and must not be the sort of communication that would reflect negatively on the Company; or be used in any other manner in violation of Company policy. The Company reserves the right to restrict access to certain applications on Company-provided devices due to privacy, security and legal concerns. To protect sensitive patient and Colleague data, the use of TikTok is not permitted on Company-provided devices.

A Colleague who chooses to engage in the use of Colleague Digital Media when on working time or using a Company-provided device must understand that, because the Company is

facilitating their use of Digital Media, the Company may monitor any and all such use. The Colleague may be disciplined, up to and including termination for any such use that violates these Guidelines. By way of example only, a Colleague likely would be disciplined (and possibly terminated) for using Digital Media while on working time or using a Company-provided device to make threats against others, to express racist opinions, to use obscene language, or to make derogatory or disrespectful comments about persons or organizations.

IV. Personal Use of Colleague Digital Media When on Personal Time and Using Personal Devices

The Company respects the right of Colleagues to participate in Colleague Digital Media 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 any applicable Company policies to provide a clear distinction between Colleagues as an individual and as a Colleague of the Company

The following rules and guidelines apply to Colleague Digital Media.

Personal responsibility. Colleagues are personally responsible for their use of and actions on or with Digital Media. Colleagues can be held personally liable for commentary, actions and/or use that is considered defamatory, obscene, proprietary or libelous by any offended party, not just the Company.

Be respectful. If a Colleague has identified themselves as a Colleague of the Company, the Colleague should not use Digital Media in a manner that could be viewed by a reasonable person as malicious, obscene, threatening, harassing, bullying or otherwise unlawful. Prohibited threatening, harassing, bullying and unlawful conduct includes offensive posts or other use of Digital Media intended to harm someone's reputation, discriminate or that 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 expression, genetic information or any other classification protected by local, state or federal law as identified from time to time.

Disclaimer. When a Colleague identifies themselves as a Colleague of the Company, some readers may view the Colleague as a spokesperson for the Company. Because of this possibility, Colleagues should state in the description or "about" section of any Digital Media profile or account that the views expressed by them through Digital Media are their 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 the trademark or logo of the Company on personal blogs or other sites. But remember, simply including the disclaimer does not relax or eliminate a Colleague's need to comply with these Guidelines.

Privileged or confidential information. Colleagues are not permitted to post Company-privileged or confidential information, including without limitation copyrighted information or protected health information. Colleagues who have access to or work with confidential information as part of their job duties, cannot disclose or post such information. Testimonials authored by patients may not be repurposed or requoted without the express written authorization of the patient.

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, without a signed company approved [consent form](#). Colleagues should ask permission before posting photos of co-workers. Be mindful of public perception when posting workplace photos.

Company products and services. Except as authorized or requested by the Company, Colleagues may not post Company products or services listed as “for sale” to Colleague Digital Media.

Endorsements. The Company does not endorse people, products, services or organizations. Authorized Company Digital Media should not be used to provide such endorsements. For Colleague Digital Media where the Colleague connection to the Company is apparent, Colleagues should be careful to avoid implying that an endorsement of a person or product is on behalf of the Company rather than a personal endorsement. As an example, LinkedIn users may endorse individuals or companies, but may not use the Company's names in connection with the endorsement, state or imply the endorsement is on behalf of the Company, or state specifically that the endorsement is based on work done at the Company.

Solicitation. Unless authorized, Colleagues are not permitted to solicit gifts or donations that directly benefit patients, Colleagues or themselves on behalf of the Company. For example, a Colleague is not permitted to develop a fundraising page, such as GoFundMe, Fundly, Bonfire, DonateKindly, Kickstarter, Crowdwise or similar page that associates or appears to associate the Company with the solicitation and/or receipt of gifts or donations for patients, another Colleague or the Colleague who created the fundraising page. Nothing in this section prohibits Colleagues from donating to these types of fundraising sites or creating non-Company-associated fundraising sites for friends, family or themselves. For further information, please see the Company's Solicitation policy, [HR.ER.026](#).

Branding. The Digital Media name, handle, URL or similar avatar or identifier of a Colleague should not include the Company's or affiliated employer's name or logo. In addition, Colleagues are prohibited from using Company logos, trademarks, taglines/slogans and messaging in Colleague Digital Media profiles and accounts without advance, written approval from the marketing and corporate affairs department. Note that an exception to this guideline is on LinkedIn, or similar professional networking

Digital Media, where Colleagues may include factual information (such as the name of the employer) as part of the personal Digital Media profile or account, and, in some cases, automatically link to the Company's profile, account or page. Professional discretion is advised and such linking may be subject to Company approval or revision at any time.

Managers and supervisors. The Company discourages staff in management/supervisory roles from initiating and/or accepting connection or "friend" requests or follows from or with Colleagues who report to them, unless the personal relationship predates the professional relationship. Though well intended, Digital Media can blur the boundaries between a professional and personal relationship.

Patient communication. Colleagues should not use Digital Media to discuss or communicate patient information with any patients, even if the patient initiated the contact or communication. Colleagues should always use Company-approved communication methods when communicating with patients about their health or treatment.

Privacy and security. Consult the Information Protection & Security site on [Atlas Connect](#) for social media privacy and security tips.

V. Monitoring

Colleagues should have no expectation of privacy while posting information to Digital Media. 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 Digital 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 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. Oversight of Digital Media on the Company-owned intranet is the responsibility of the page or site owner and must be reviewed and updated annually. A Company-owned intranet page or site owner must be an individual – not a department or group – at the manager level or above.

VI. Reporting and Discipline for Violations

Reporting violations. The Company strongly urges Colleagues to report any actual, possible or perceived violations to a supervisor, manager, the Human Resources VP and Human Resources Employee Relations, the facility privacy official and/or ethics and compliance officer (if patient information is involved) or the Ethics Line at <https://hcahealthcareethicsline.ethix360.com> or by calling 1-800-455-1996. The reported actual, possible or perceived violation will be escalated to the attention of the direct supervisor

and Human Resources VP of the Colleague who was reported as violating these Guidelines. An investigation may be conducted by the Human Resources VP, which may include Human Resources Employee Relations, confirming the identity of the reported violator and content in question. Upon review by the Colleague's supervisor and Human Resources VP, a determination will be made as to the appropriate counseling and/or discipline.

Discipline. The Company investigates and responds to reports of [EC.026](#) violations, these Guidelines and other related policies. Violations may result in disciplinary action. Managers must first consult with the Human Resources VP and Human Resources Employee Relations before taking any disciplinary action as outlined in the Discipline, Counseling, Corrective Action Policy, [HR.ER.008](#).