

DEPARTMENT: Ethics and Compliance	POLICY DESCRIPTION: Ethics and Compliance Program Contracts
PAGE: 1 of 1	REPLACES POLICY DATED: 5/14/1999
EFFECTIVE DATE: January 1, 2006	REFERENCE NUMBER: EC.016
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: All Company facilities including, but not limited to hospitals, ambulatory surgery centers, home health agencies, and physician practices, and all Corporate Departments, Groups, Divisions and Markets.</p>
<p>PURPOSE: To ensure that all vendor contracts that relate in any way to the Ethics and Compliance Program include language prohibiting such vendors from using their relationship with the Company in a public way without prior written approval.</p>
<p>POLICY: All vendor contracts that relate in any way to the Ethics and Compliance Program, including any activities that would reasonably be considered as part of the Program, must include language prohibiting such vendors from advertising, disclosing, or otherwise discussing their business relationship with the Company without prior written approval of the Company's Corporate Ethics and Compliance Officer.</p>
<p>PROCEDURE: All vendor contracts, whether for services or products, that relate in any way to the Ethics and Compliance Program, including any activities that would reasonably be considered as part of the Program, must include the following, or similar, language:</p> <p style="padding-left: 40px;">"The vendor agrees not to advertise, disclose, or otherwise discuss this Agreement and its business relationship with HCA and/or its affiliates (collectively, the "Company") without the prior written consent of the Company's Corporate Ethics and Compliance Officer. Any violation of this provision shall be considered a material breach of this Agreement, conferring on [name of the Company subsidiary that is the party to this agreement] the right to cancel this Agreement immediately without further obligation to the vendor and to seek any other legal recourse available to it."</p>
<p>REFERENCES:</p>