**SCOPE:** All Company facilities including, but not limited to, hospitals, ambulatory surgery centers, home health agencies, physician practices, and all Corporate Departments, Groups and Divisions.

**PURPOSE:** To provide guidance to Corporate and facility management concerning political contributions (personal and Corporate) to candidates and political action committees (PACs) at the state, federal, and local levels. This policy covers the following political contributions:
- Personal contributions
- Corporate contributions
- PAC contributions

**POLICY:** It is the Company’s policy that all campaign contributions and PAC operations be conducted in compliance with applicable federal and state laws and regulations and consistent with the Company Code of Conduct. It is the Company’s general rule that Corporate or facility contributions may not be made directly to a candidate or campaign. However, in very limited exceptions approved by the Senior Vice President and Chief Ethics and Compliance Officer, a Corporate or facility contribution may be made directly to a candidate or campaign.

**PROCEDURE:**

1. The Company operates a federal PAC and oversees the operation of a number of state PACs. The federal PAC is governed by federal campaign laws while each state PAC is governed by the laws and regulations of the state in which it has been created. Each PAC must adhere to the attached guidelines.

2. The following procedures are to be followed by Corporate and facility management relating to personal and PAC contributions. These do not cover every circumstance and individuals are encouraged to call the Government Relations Department or their Operations Counsel for clarification.
   a. **Personal Contributions to Candidates/PACs** – Company colleagues may make personal contributions to federal, state, and local candidates in their sole discretion. The decision as to whether or not to contribute is at the sole discretion of the individual and any decision not to participate shall have no impact on any personnel actions regarding such individual. These contributions should be made in compliance with applicable federal or state campaign finance laws. Under no condition will personal campaign contributions be reimbursed by the Company or a facility or otherwise identified as a business expense by the individual making the contribution.
   b. **Corporate Contributions to Candidates or Campaigns** – Except when approved by the Senior Vice President and Chief Ethics and Compliance Officer, the Company, including any of its affiliated facilities, may not make contributions directly to a candidate or a campaign at any level.
      i. Exceptions must be requested of the Senior Vice President and Chief Ethics and Compliance Officer after discussion with and through the Government Relations Department.
      ii. Exceptions are to be requested using the attached Exception Request Form.
<table>
<thead>
<tr>
<th>DEPARTMENT: Government Relations</th>
<th>POLICY DESCRIPTION: Political Contributions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PAGE: 2 of 2</td>
<td>REPLACES POLICY DATED: 9/29/98, 10/15/02, 1/1/09, 10/15/10, 6/1/11</td>
</tr>
<tr>
<td>EFFECTIVE DATE: May 1, 2019</td>
<td>REFERENCE NUMBER: GR.001</td>
</tr>
<tr>
<td>APPROVED BY: Ethics and Compliance Policy Committee</td>
<td></td>
</tr>
</tbody>
</table>

c. **PAC Contributions to Candidates** – Through the Company’s PAC process, contributions may be made to candidates and applicable political organizations or groups. All contributions must be made in accordance with applicable federal or state laws and regulations. If you have questions concerning the PAC process for requesting a contribution, contact the Government Relations Department.

d. **PAC Funding**
   i. The Company operates a federal PAC and several state PACs. Funding for the federal PAC may be provided through personal contributions only. The Company periodically conducts a fund raising drive among eligible employees to finance the federal PAC.
   ii. Depending upon the applicable state law, company-sponsored state PACs may be funded by individual contributions, Corporate/facility contributions, or a combination of both individual and Corporate contributions. Under no circumstances may a federal contribution be made through a state PAC.
   iii. In some states, it is legal for a PAC to make a contribution to another PAC (such as the State Hospital Association PAC). Additionally, in states that allow corporate contributions to PACs, it is appropriate for a facility to make a contribution to another PAC (such as the State Hospital Association PAC), but these requests must be coordinated through the applicable Division Office and the Government Relations Department.

3. **Government Relations Consultants** – A copy of this policy must be provided to each government relations consultant who must be advised that he/she is expected to comply with the requirements established by this policy.

**REFERENCES:**

Code of Conduct, Government Relations and Political Activities Section.
Guidelines for
Company Political Action Committees

All political action committees (PACs) affiliated and connected with HCA Healthcare, should follow these guidelines:

- Comply with all appropriate state and/or federal laws
- Effective administration of PAC by appropriate operations personnel
- Bylaws must be on file for each committee
- Officers for each committee should be in accordance with your state’s law and consistent with your bylaws.
- Contributions Committee should be formed to review and satisfy contribution requests.
- One individual and one alternate should be responsible for monitoring state laws regarding political action committee, and maintain full compliance with appropriate state laws.
- One individual and one alternate should be responsible for filing state required political action committee reports on the due date. Reporting dates may be obtained from your state ethics commission.
- Appropriate IRS reports should be prepared and filed by either the responsible party or by a retained accounting firm.
- A copy of all state reports, or notice that the report has been filed electronically, should be sent to debi.tucker@hcahealthcare.com.
- Information on your PAC that the Corporate Government Affairs Department should have on file:
  - copy of bylaws;
  - name of key person responsible for PAC administration;
  - names of Officers;
  - person(s) responsible for monitoring laws and filing reports; and
  - copies of tax returns.

Any questions about the above information should be directed to Debi Tucker at 615-963-3830 or via e-mail.
HCA HEALTHCARE CORPORATE POLITICAL CONTRIBUTION REQUEST
AND EXCEPTION FORM

This form should be used to request an exception pursuant to the Political Contributions Policy, GR.001.

GROUP/ORGANIZATION INFORMATION  (Please print)

NAME:__________________________________________________________________________________

ADDRESS:__________________________________________________________________________________

__________________________________________________________________________________

(City)                                                             (State)                        (Zip)

DESCRIPTION OF GROUP/ORGANIZATION:____________________________________________________________

__________________________________________________________________________________

MAKE CHECK PAYABLE TO:

__________________________________________________________________________________

AMOUNT REQUESTED ______________________

__________________________________________________________________________________

I HAVE NOTIFIED THE FOLLOWING INDIVIDUALS AND THEY AGREE WITH THE CONTRIBUTION

DIVISION PRESIDENT: Y  (OR ATTACH EMAIL AUTHORIZATION)
GROUP PRESIDENT: Y            (OR ATTACH EMAIL AUTHORIZATION)

STATE REPORTING REQUIRED FOR CONTRIBUTION  Y  N  (CIRCLE ONE)

**ATTACH COPY OF STATE LAW AUTHORIZING CORPORATE CONTRIBUTIONS

Submitted by:                                                                                     
Division:                                                                                         
State:                                                                                             

Explanation of the need for an exception:

Recommendation by Government Relations: Signature:  Date:

Approval by Senior Vice President and Chief Ethics and Compliance Officer:

Approval by Senior Vice President and Chief Ethics and Compliance Officer:

Denial by Senior Vice President and Chief Ethics and Compliance Officer:

Signature:  Date:

Please submit initially to: Corporate Government Affairs Department

c/o Debi Tucker
P.O. Box 550
Nashville, TN  37202-0550
debi.tucker@hcahealthcare.com