

<b>DEPARTMENT:</b> Legal	<b>POLICY DESCRIPTION:</b> Global Anti-Corruption
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<b>EFFECTIVE DATE:</b> January 1, 2017	<b>REFERENCE NUMBER:</b> LL.AC.001
<b>APPROVED BY:</b> Ethics and Compliance Policy Committee	

**SCOPE:** All Company-affiliated facilities worldwide including, but not limited to, hospitals, ambulatory surgery centers, home health centers, home health agencies, physician practices, outpatient imaging centers, service centers, joint ventures and all Corporate departments, Groups, Divisions and Markets.

**PURPOSE:** To promote compliance by all HCA Employees and Colleagues with the anti-corruption laws that apply to Company operations, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the anti-corruption laws of Foreign Countries in which HCA conducts business. This policy focuses on interactions with Foreign Officials, but Employees and Colleagues should be aware that the laws of some countries in which HCA operates prohibit the bribery of any person (not merely bribery of Foreign Officials). Employees and Colleagues must comply with the anti-corruption laws in their respective jurisdictions and those of other jurisdictions that apply to them.

**POLICY:**

1. **Overview**

HCA’s Global Anti-Corruption Policy prohibits bribes, kickbacks, improper or illegal inducements or other unlawful payments from being directly or indirectly offered, provided or authorized to, or for the benefit of any Foreign Official (defined herein to include Family Members of the Foreign Official), in any way related to HCA’s business. All Employees and Colleagues must comply with the anti-corruption laws that apply to the Company’s operations, including the FCPA and the anti-corruption laws of their respective jurisdictions and those of other jurisdictions that apply to them.

2. **Compliance Responsibilities, Risk Assessments and Oversight of the Anti-Corruption Policy**

All Employees and Colleagues and Third Party Representatives are required to comply with this Policy and to help prevent violations of this Policy by those whom they directly or indirectly supervise.

Violations of anti-corruption laws can subject individuals and HCA to serious criminal and civil penalties, including imprisonment and exclusion from U.S. government programs. Failure to abide by this Policy can also result in disciplinary action by HCA, including possible termination of employment.

To implement this Policy, the Anti-Corruption Responsible Executive, in consultation with the Chief Ethics and Compliance Officer (or designee), shall periodically assess the Company’s anti-corruption risk, review this policy and its procedures and, as needed, may revise existing procedures and issue new procedures, including procedures and guidelines for compliance in Foreign Countries.

3. **Prohibited Conduct**

Employees and Colleagues may not give, offer or authorize the provision of anything of value to, or for the benefit of, a Foreign Official, in order to obtain or retain business, to secure any other business advantage, or to obtain beneficial governmental treatment, except as specifically permitted in Policy Section 4 below.

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Employees and Colleagues may not do indirectly what they cannot do directly. Anything of value that cannot be given directly to a Foreign Official also cannot be given indirectly through a third party or to a third party at the Foreign Official's request.

4. **Scope of Permissible Expenditures for Meals, Gifts, Entertainment, Travel and Other Things of Value for Foreign Officials**

This section recognizes that it is likely that Employees and Colleagues conducting business outside the United States will interact with persons who would be considered Foreign Officials under the FCPA, including employees of state-owned enterprises, and that business with Foreign Officials or entities owned by foreign governments may be an important part of the Company's business in Foreign Countries. Neither the FCPA nor this Policy prohibits conducting business with foreign governments. However, interactions with individual Foreign Officials pose a special risk under anti-corruption laws, and it is extremely important that our dealings with Foreign Officials are transparent and open.

Any expenditure for meals, gifts, entertainment, travel or other things of value must be consistent with the requirements outlined below. Additionally, as set forth in Policy EC.005: "Nothing in this policy permits any business courtesy or other benefit that is understood by either party to be offered or provided as an inducement to refer patients or business or as a reward for such referrals, nor may a business courtesy be extended to a potential referral source who solicits it."

Accordingly, before an Employee or Colleague may directly or indirectly give, offer, authorize or provide anything of value to a Foreign Official, he or she must first ensure that all of the following requirements are met:

- a. The thing of value must be provided only for the purpose of lawfully promoting, demonstrating or explaining the Company's services or products, or conducting other lawful and bona fide business activities (usually limited to appropriate travel and lodging expenses);
- b. The thing of value must be provided openly and in a way that does not create the appearance of impropriety or illegality;
- c. The Foreign Official must not have directly or indirectly requested from HCA or any third party anything of value for any individual's personal benefit;
- d. Payment for the thing of value must be provided directly to the provider of the thing of value (*i.e.*, to the provider of the meal, gift, entertainment or travel) and not directly to the Foreign Official; and
- e. The value of the thing or things is reasonable under all of the circumstances.

If all of the above preliminary requirements are met, then the Employee or Colleague must then determine whether he or she must obtain prior express written approval of the Senior Vice President (SVP) and Chief Ethics and Compliance Officer (or designee). To do so, the Employee or Colleague must follow these steps:

- a. If the value is less than the prescribed limit set forth in Appendix A, then the thing of value may be provided without prior approval of the SVP and Chief Ethics and Compliance Officer (or designee).

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- b. If the value is more than the limit specified, then the prior express written approval of the SVP and Chief Ethics and Compliance Officer (or designee) must be obtained. The specific procedure for obtaining prior approval is in Procedures Section 1 below.
- c. If Appendix A does not include a procedure for the country of the Foreign Official, then prior express written approval of the SVP and Chief Ethics and Compliance Officer (or designee) is required.

In rare circumstances when pre-approval is not possible, the Employee should consult with the SVP and Chief Ethics and Compliance Officer (or designee) as soon as is reasonably practical. Even if prior approval is not required (or possible) under this Policy, if the intended recipient is a Foreign Official, documentation and/or receipts substantiating the provision of the thing of value must promptly be provided to the SVP and Chief Ethics and Compliance Officer (or designee) in accordance with Policy Section 8 and Procedures Section 2 below. The approval and recordkeeping requirements do not apply if the thing of value is provided to another Employee or Colleague whose hiring was approved, pursuant to Procedures Section 3, by the SVP and Chief Ethics and Compliance Officer (or designee).

Employees and Colleagues must also comply with EC.005, EC.006, EC.023, LL.001 - LL.006, GR.002, and HR.ER.019, if applicable.

**5. Charitable Donations and Political Contributions Outside the United States**

- a. Charitable Donations. Before making any donation on the Company's behalf to a charity outside the United States, Employees and Colleagues must obtain prior written approval from the SVP and Chief Ethics and Compliance Officer (or designee). The SVP and Chief Ethics and Compliance Officer may delegate to HCA subsidiaries and affiliates located in Foreign Countries the authority to approve charitable donations to charities based within the country in which the HCA subsidiary or affiliate is located.
- b. Political Contributions. Before making any political contribution on the Company's behalf outside the United States, including but not limited to any elected official, political party, candidate for public office, political campaign, or political party official, Employees and Colleagues must obtain prior written approval from the SVP and Chief Ethics and Compliance Officer (or designee). Employees and Colleagues must also comply with Procedures Section 6.

**6. Additional Restrictions Applying to Agreements With Foreign Officials and the Retention of Third-Party Foreign Representatives**

Agreements with physicians who may be Foreign Officials must comply with Policies LL.001 – LL.006 and/or applicable country-specific policies. Where there is reason to believe that a provider of other necessary goods or services is a Foreign Official or is owned by or affiliated with a Foreign Official, Employees and Colleagues must consult the SVP and Chief Ethics and Compliance Officer (or designee) regarding appropriate due diligence to be conducted and must obtain, in writing, the approval of the SVP and Chief Ethics and Compliance Officer (or designee) before contracting to purchase the goods or services.

When engaging or contracting with a Third-Party Foreign Representative to act on behalf of HCA, Employees and Colleagues must comply with the Procedures for the Retention of Third-Party Foreign Representatives provided in Appendix B to this Policy. Additionally, each

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Third-Party Foreign Representative that acts on behalf of the Company must comply with this Policy. Third-Party Foreign Representative compliance is important because, under certain circumstances, the conduct of HCA's Third-Party Foreign Representatives could result in civil or criminal prosecution for HCA and/or HCA Employees and Colleagues.

7. **Mergers, Acquisitions, Consortia & Joint Ventures**

When considering a merger, acquisition, consortium or joint venture that could involve a Foreign Official, foreign counter-party, or counter-party that likely engaged in business activity in a Foreign Country or with a Foreign Official, Employees and Colleagues must comply with the procedures for Mergers, Acquisitions, Consortia & Joint Ventures provided in Procedures Section 4 below. Under certain circumstances HCA can be held liable for activities of joint venture partners related to HCA's business or for the anti-corruption violations of entities that it acquires, even where the violations occurred before HCA acquired the entity.

8. **Effective Internal Controls and Accurate Books and Records**

The FCPA and HCA's policies require Employees and Colleagues to make and keep complete and accurate books, records and accounts, which in reasonable detail accurately and fairly reflect transactions involving HCA's assets. Although these provisions apply to all corporate transactions, Employees and Colleagues should take special care to ensure that any expenditure of Company funds related to any Foreign Official are accurately and completely documented, regardless of the amount of such transaction. Under no circumstances should false, misleading or artificial entries be made in the books and records of the Company, and no undisclosed or unrecorded funds or assets of the Company shall be established for any purpose.

9. **Mandatory Reporting**

- a. HCA provides an Ethics Line that enables anonymous reports of potential violations of this Policy, the FCPA and other applicable anti-corruption laws.
- b. Anyone who becomes aware of or receives a reasonably credible report that one of the following may have occurred, is occurring or is likely to occur:
  - i. any of the warning signs related to Foreign Officials and Third-Party Foreign Representatives described in Appendix C of this Policy (Frequently Asked Questions);
  - ii. a violation of the FCPA;
  - iii. a violation of other anti-corruption laws applicable to HCA; or
  - iv. a violation of this Policy

must promptly report such concerns to one's supervisor, an Employee or Colleague higher in the reporting chain, the facility ECO, or via the Ethics Line at 1-800-455-1996. Anyone calling from outside the United States should use the Ethics Line access numbers provided in the instructions on the HCA website, at <http://hcaethics.com/ethics/index.dot>.

- c. Any Employee or Colleague who fails to report any such warning signs or violations may be subject to disciplinary action, including termination. See the Reporting Compliance Issues and Occurrences to the Corporate Office Policy, EC.025, for additional information regarding HCA's reporting policies.

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d. HCA has a strict prohibition on retaliation against Employees and Colleagues who, in good faith, either make reports or participate in the investigation of a report of suspected misconduct.

**10. Training Requirements**

Employees and Colleagues shall receive anti-corruption training commensurate with their respective positions and duties with the Company, as directed by the Anti-Corruption Responsible Executive (or designee). Documentation regarding this training must be kept in the Company's Learning Management System.

**11. Promulgation of Additional Anti-Corruption Policies and Procedures in Foreign Countries**

Subject to the approval of the Anti-Corruption Responsible Executive (or designee) and the SVP and Chief Ethics and Compliance Officer (or designee), HCA subsidiaries and affiliates located in Foreign Countries may promulgate additional anti-corruption policies and procedures that apply to their respective business units.

**SANCTIONS:** Any Employee or Colleague who violates this policy may be subject to disciplinary action, up to and including termination.

**DEFINITIONS:** For purposes of this Policy,

**“Anything of value”** or a **“thing of value”** should be interpreted broadly to mean anything that could benefit the recipient.

Examples can include:

- Cash;
- Stock or stock equivalents, such as options or warrants;
- Gift cards, vouchers or things similar to cash;
- Gifts;
- Services;
- Use of company facilities, equipment or property;
- Entertainment, event tickets, golf;
- Meals, drinks or other hospitality;
- Payments or reimbursements of travel expenses, lodging, or vacations;
- Offers of employment to the recipient or Family Members;
- Discounts or rebates; and
- Charitable donations.

**“Board Members”** means members of the HCA Holdings, Inc. Board of Directors.

**“Employees and Colleagues”** refers to employees, officers, Board Members and others acting on behalf of the Company.

**“Contracting Officer”** means the HCA officer who, if not the Sponsor, directly or indirectly supervises the Sponsor, is accountable for executive oversight of a Third-Party Foreign Representative and who authorizes the HCA contract with the Third-Party Foreign Representative.

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**“Family Member”** includes, but is not limited to, husband or wife; natural parent, adoptive parent or stepparent; child or stepchild; sibling, half-sibling or step-sibling; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild.

**“Foreign Country”** means any country other than the United States.

**“Foreign Official”** means any individual employed by, or acting on behalf of, the government of a Foreign Country (non-United States), an instrumentality of the government of a Foreign Country, or an entity owned or controlled by the government of a Foreign Country (e.g., a government-owned hospital or manufacturing facility), or a public international organization (e.g., the World Health Organization). Foreign Official also means any political party in a Foreign Country, any candidate for public office in a Foreign Country or any political party official in a Foreign Country. An individual can be considered a Foreign Official even though he or she may not be treated as a Foreign Official by his or her own government, and even though he or she may expect to be treated like a private businessperson. All references to Foreign Officials in this Policy include **“Family Members”** of the Foreign Official.

Examples of persons who should be treated as Foreign Officials under this Policy include, but are not limited to:

- Employees of a company owned or controlled by the government of a Foreign Country, even if the government is not the sole owner;
- Embassy employees;
- Members of royal families and those acting on their behalf;
- Physicians and other employees of hospitals, insurers or other entities owned or controlled by national, state or local governments of any Foreign Country;
- Customs, tax, and licensing officials;
- Political party officials of Foreign Countries (even if they do not hold public office); and
- Employees of the World Health Organization.

If you do not know whether an individual in or from a Foreign Country is a Foreign Official as defined under this Policy, you are required to treat such person as a Foreign Official when acting on behalf of HCA until you have confirmed that the individual is not a Foreign Official.

**“HCA” or “the Company”** means HCA Holdings, Inc. and any of its subsidiaries and affiliates.

**“Third-Party Foreign Representative”** means any independent contractor, supplier, distributor, consultant, representative or agent of any kind other than an Employee or Colleague of the Company who has a reasonable possibility of (1) interacting with a Foreign Official on behalf of the Company; or (2) contracting or otherwise transacting business in – or directed at – a Foreign Country with other parties on behalf of the Company. It is not intended to apply to any person or entity who, based on all of the circumstances, in no event could ever reasonably be said to act on behalf of the Company.

**“Sponsor”** means the Employee or Colleague who is accountable for the selection and oversight of a Third-Party Foreign Representative.



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**PROCEDURES:**

1. **Procedure for Obtaining Prior Approval Before Providing Meals, Gifts, Entertainment, Travel and Other Things of Value Permitted By Policy Section 4**

If approval of the SVP and Chief Ethics and Compliance Officer (or designee) is required by Policy Section 4 above, Employees and Colleagues must request approval by providing the SVP and Chief Ethics and Compliance Officer (or designee) with the following information:

- a. The name, title, organization and country of the Foreign Official;
- b. A description of the thing of value proposed to be given to the Foreign Official;
- c. The dollar value of the thing, in U.S. and local currency;
- d. Any available documentation and/or receipts substantiating such value;
- e. The business purpose of the proposed offer or provision; and
- f. The proposed date and circumstances of the offer or provision.

2. **Record-Keeping and Notification Requirements**

Except as noted below, any Employee or Colleague who provides anything of value to any Foreign Official regardless of the value of what is provided, must, after providing the thing of value, promptly provide documentation and/or receipts substantiating the value to the SVP and Chief Ethics and Compliance Officer (or designee). The documentation and/or receipts must identify the following:

- a. Who: the name, title, and organization of each person involved (including each Employee or Colleague and each Foreign Official), and the person or entity to whom anything of value was provided;
- b. What: the benefit provided to the Foreign Official (e.g., dinner, tickets, etc.) and the amount of the benefit;
- c. When: the date the benefit was provided and any pertinent circumstances;
- d. Where: the location where the benefit was provided and;
- e. Why: the business purpose of the benefit conferred.

The SVP and Chief Ethics and Compliance Officer (or designee) shall maintain a log of all things of value offered or provided to any Foreign Official (the "Foreign Official Log") that are reported to the SVP and Chief Ethics and Compliance Officer (or designee), as well as any communication to the SVP and Chief Ethics and Compliance Officer (or designee) requesting permission to offer or provide a thing of value to a Foreign Official. The Foreign Official Log shall identify each such request; the Employee or Colleague that made the request; the date of the request; the thing of value; the date of its provision and/or offer; the value of the provision or offer; documentation and/or receipts substantiating the value; the business purpose of the offer or provision; any business of the Company which the Foreign Official was in a position to influence; and any action taken regarding the request. The SVP and Chief Ethics and Compliance Officer (or designee) may delegate the collection of the information required by this procedure to designees in specific Foreign Countries so long as the information is periodically incorporated into the Foreign Official Log. The requestor shall also maintain a copy of his or her request, and any response, for five years.

There is an exception to these requirements for company-branded promotional items of a value generally less than \$20. In addition, nominal refreshments, such as a cup of coffee, need not be recorded in the Foreign Official Log so long as they are of a value generally less

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than \$10 and not provided to a Foreign Official more than four times per year. However, Employees and Colleagues must document on the corresponding expense report the name, country, and title of any Foreign Official to whom such nominal refreshments are provided.

3. **Hiring**

The following persons may not be offered any position or hired by the Company without prior written approval of the SVP and Chief Ethics and Compliance Officer (or designee):

- a. Anyone who is a current or former Foreign Official (including Family Members); and
- b. Anyone who a Foreign Official requested the Company to hire.

Additional hiring restrictions apply. See the Limitations on Employment Policy, HR.OP.019.

4. **Mergers, Acquisitions, Consortia & Joint Ventures**

HCA can under certain circumstances be held liable for the anti-corruption violations of entities that it acquires, even where the violations occurred before HCA acquired the entity. Similarly, HCA can be liable for activities of joint venture partners related to HCA's business. To mitigate these risks, Employees and Colleagues must:

- a. **Notify Designated Personnel.** The SVP and Chief Ethics and Compliance Officer (or designee) must be notified before:
  - i. initiating any communication with a Foreign Official, directly or indirectly, that relates to any merger, acquisition, consortium or joint venture relationship; or
  - ii. pursuing any merger, acquisition, consortium or joint venture relationship that involves a prospective foreign counter-party or a counter-party that within the past five years is reasonably likely to have engaged in any business activities in a Foreign Country or with any Foreign Official.
- b. **Conduct & Review Reasonable Due Diligence.** The General Counsel (or designee) will determine the scope of due diligence to be conducted on each specific merger, acquisition, consortium or joint venture and must review due diligence findings and approve such transaction before any such transaction may be closed or consummated.
- c. **Written Agreements with Anti-Corruption Protections.** Mergers, acquisitions, consortia and joint venture relationships must be governed by a written agreement that contains reasonable anti-corruption provisions addressing such laws in applicable jurisdictions to protect HCA.

5. **Retention of Third-Party Foreign Representatives**

When retaining Third-Party Foreign Representatives, renewing agreements with Third-Party Foreign Representatives, and reporting requirements relating to Third-Party Foreign Representatives, Employees and Colleagues must comply with the procedures that are provided in Appendix B to this Policy.

6. **Government Relations**

Employees and Colleagues must comply with the General Statement on Government Relations Policy, GR.002, when engaging in public policy debate, lobbying, PAC support, individual political contributions, advocacy advertising, or the loan of Employees and Colleagues to governments or public organizations.



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**7. Reporting Regarding Foreign Officials**

The following requests must be promptly reported to your supervisor, an Employee or Colleague higher in your supervisory chain, your facility ECO, or via the Ethics Line at 1-800-455-1996 (or if calling from outside the United States, via the Ethics Line access numbers provided in the instructions on the HCA website, at <http://hcaethics.com/ethics/index.dot>): any request of a Foreign Official or third party for payment to a Foreign Official personally in return for the Foreign Official ensuring that official action will or will not be taken; unusual methods of payments for government services (e.g., payment through a third country or institution); payment in excess of the amount usually required for the specified government services; any reasonably credible report of suspicious, unethical, or unlawful conduct about a Foreign Official; and any request or demand that the Company retain or utilize specific agents, representatives, vendors or service providers.

**REFERENCES/RESOURCES:**

- Additional Procedures and Guidelines for Expenditures in Specific Countries (Appendix A)
- Procedures for the Retention of Third-Party Foreign Representatives (Appendix B)
- Frequently Asked Questions (Appendix C)
- Business Courtesies to Potential Referral Sources, [EC.005](#)
- Entertainment Policy, [EC.006](#)
- Gifts Policy, [EC.023](#)
- Reporting Compliance Issues and Occurrences to the Corporate Office, [EC.025](#)
- General Statement on Government Relations, [GR.002](#)
- Limitations on Employment, [HR.ER.019](#)
- General Statement on Agreements with Referral Sources: Approval Process, [LL.001](#)
- Professional Services Agreements, [LL.002](#)
- Physician Recruiting Agreements, [LL.003](#)
- Physician Equipment or Space Leases, [LL.004](#)
- Physician Management Services Agreements Business Office Services Agreements, [LL.005](#)
- Physician Employment, [LL.006](#)
- U.S. Foreign Corrupt Practices Act (FCPA)