

DESCRIPTION OF AMENDMENTS TO CODE OF CONDUCT

On October 23, 2024, the Audit and Compliance Committee of the Board of Directors of HCA Healthcare, Inc. approved an amended HCA Healthcare Code of Conduct (the “Code”) effective January 1, 2025, which reflects the following:

- Clarified patient rights, including regarding access to electronic health information, and our commitment to nondiscrimination;
- Clarified our workplace commitment against discrimination based on protected characteristics in accordance with applicable federal, state, or local laws, and to provide that reasonable accommodations will be made to known qualified individuals with disabilities;
- Added provisions regarding the responsible use of artificial intelligence (AI), including compliance with HCA Healthcare policies and standards and with legal and regulatory requirements; and
- Enhanced provisions relating to government relations and business activities, including with respect to public policy debates, separation of personal and corporate political activities, and communications with public officials.

In addition, various provisions of the Code were reorganized or reworded to improve clarity and readability. The amendments also include certain technical, administrative or other non-substantive amendments. The adoption of the Code did not relate to, or result in, any waiver, explicit or implicit, of any provision of the Code. The foregoing summary description of the changes contained in the Code does not purport to be complete and is qualified in its entirety by reference to the full text of the Code, a copy of which is available on the Company’s website at www.hcahealthcare.com in the “Ethics & Compliance” and “Governance” sections.