

DEPARTMENT: Engineering	POLICY DESCRIPTION: Mercury Reduction and Virtual Elimination
PAGE: 1 of 2	REPLACES POLICY DATED:
EFFECTIVE DATE: February 1, 2020	REFERENCE NUMBER: ENV.020
APPROVED BY: Ethics and Compliance Policy Committee	

<p>SCOPE: All Company-affiliated facilities including, but not limited to, hospitals, ambulatory surgery centers, home health centers, home health agencies, physician practices, outpatient imaging centers, service centers and all Corporate departments, Groups, Divisions and Markets.</p>
<p>PURPOSE: To establish the Company's commitment of reducing and seeking to achieve virtual elimination of mercury in the most efficient, cost effective and environmentally responsible manner while providing a healthy environment for its patients, providers, employees and visitors and to continue its commitment to the care and improvement of human health.</p>
<p>POLICY: The Company is committed to continuous improvement of the effect on the indoor environment by taking actions including:</p> <ol style="list-style-type: none"> 1. Seeking to achieve virtual elimination of mercury in its facilities; 2. Providing a framework for action; and, 3. Adhering to applicable federal, state, and local environmental laws, regulations, and requirements concerning the safe and appropriate removal, replacement, or disposal of mercury and mercury containing devices. <p>This commitment is consistent with the Company's Sustainability Plan.</p> <p>Definition:</p> <p>Virtual elimination of mercury means the healthcare sector recognizes that in some cases full elimination of mercury and mercury-containing devices in healthcare might not be possible.</p>

<p>PROCEDURE:</p> <ol style="list-style-type: none"> 1. Typical uses of mercury and mercury-containing devices in healthcare include sphygmomanometers, laboratory and patient care thermometers and gastro-intestinal devices. Mercury compounds are also found elsewhere, such as in preservatives, fixatives and reagents used in hospital laboratories. Fluorescent bulbs, boiler switches, and other items supporting or necessary for facility management may also contain some mercury. 2. It shall be the strategy to, over time, replace or retrofit these items as feasible with non-mercury containing items; this includes moving from fluorescent lighting to Light-Emitting Diode (LED) choices. 3. Product evaluation and substitution should be ongoing in any successful mercury virtual-elimination program. HealthTrust Purchasing Group has identified non-mercury alternatives to some mercury containing products for purchase by HCA Healthcare-affiliated facilities. 4. For most mercury-containing products, the preferred best management practice is to replace the item with a mercury-free product. However, it may not be possible to replace all of a facility's mercury products at once and there may not be substitutes that are considered to be reliable and cost effective when delivering patient care. When a mercury-containing

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<p>product has exhausted its useful life and needs to be replaced, the product should be evaluated for mercury-free alternatives. When mercury-containing products remain in a facility, safe-handling procedures and appropriate disposal methods must be followed.</p> <ol style="list-style-type: none"> 5. It shall be the general practice that facilities should not use an onsite bulb crusher for fluorescent lamps. Other building/renovation materials should be mercury free. 6. Questions about this policy should be directed to Corporate Engineering or HCA Healthcare's Sustainability email box: Corp.ECHO@HCAhealthcare.com.
<p>REFERENCES:</p> <ol style="list-style-type: none"> 1. HCA Healthcare Sustainability Plan 2. Environmental and Waste Management Policy, ENV.001