

DEPARTMENT: Government Relations	POLICY DESCRIPTION: Political Contributions
PAGE: 1 of 2	REPLACES POLICY DATED: 9/29/98, 10/15/02, 1/1/09, 10/15/10, 6/1/11, 5/1/19
EFFECTIVE DATE: June 1, 2022	REFERENCE NUMBER: GR.001
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE: All HCA Healthcare (“Company”) facilities including, but not limited to, hospitals, ambulatory surgery centers, home health agencies, hospice 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 federal, state 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, state and local 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 and in accordance with applicable law, a Corporate or facility contribution may be made directly to a candidate or campaign. In no circumstance shall Corporate or facility contributions be made to federal candidates.

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 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, state or local 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 and in accordance with applicable law, the Company, including any of its affiliated facilities, may not make

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contributions directly to a candidate or a campaign at any level. In no circumstance shall the Company make a contribution to a federal candidate.

- i. Exceptions must be requested of the Senior Vice President and Chief Ethics and Compliance Officer after discussion with the Government Relations Department, and must be made in accordance with applicable law.
- ii. Exceptions are to be requested using the attached Exception Request Form.

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, state and local 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, other than limited administrative expenses that the Company is able to pay for under federal law. The Company periodically conducts a fundraising 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 may be appropriate for a facility to make a contribution to another PAC (such as the State Hospital Association PAC), but such requests must be coordinated through the applicable Division Office and the Government Relations Department to ensure full compliance.

3. Government Relations Consultants – A copy of this policy must be provided to each government relations consultant, who shall be advised that they are expected to comply with the requirements established by this policy.

REFERENCES:

1. Code of Conduct, Government Relations and Political Activities Section.
2. [Guidelines for HCA Healthcare Political Action Committees](#)
3. [HCA Healthcare Corporate Political Contribution Request and Exception Form](#)