

DEPARTMENT: Government Relations	POLICY DESCRIPTION: General Statement on Government Relations
PAGE: 1 of 3	REPLACES POLICY DATED: 7/11/00, 1/1/09
EFFECTIVE DATE: February 1, 2012	REFERENCE NUMBER: GR.002
APPROVED BY: Ethics and Compliance Policy Committee	

<p>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, and any relevant independent contractor or consultant.</p>
<p>PURPOSE: To provide guidance in the Company's participation in public policy matters and interaction with government officials.</p>
<p>POLICY:</p> <p><u>Public Policy Debate.</u></p> <ol style="list-style-type: none"> 1. The Company will engage in public policy debate only in a limited number of instances where it has special expertise that can inform the public policy formulation process. 2. When the Company is directly impacted by public policy decisions, it may provide relevant, factual information about the impact of such decisions on the private sector. 3. In articulating positions, the Company will only take positions that it believes can be shown to be in the larger public interest. The Company will encourage trade associations with which it is associated to do the same. 4. The Company will fully disclose its involvement with any trade association. 5. If the Company is aware that a trade association is taking a position or seeks to exercise influence on public policy in a manner that is inconsistent with the Company's policies set forth in paragraphs 1 through 3, to include truthfulness and full disclosure, it will try to change the association's position or practices. 6. The Company will withdraw its support for any particular association effort if any such concerns the Company expressed were not satisfactorily addressed. <p><u>Lobbying Activities.</u></p> <ol style="list-style-type: none"> 1. The Company will not coerce colleagues to participate in any lobbying effort on behalf of the Company. 2. The Company will not solicit colleagues to publicly support the Company's position on public policy issues unless such solicitation is based on factual information presented to the colleagues and their participation is completely voluntary. 3. At times, HCA may ask colleagues to make personal contact with government officials or to write letters to present our position on specific issues. In addition, it is a part of the role of some HCA management to interface on a regular basis with government officials. <p><u>Political Action Committee (PAC) Support.</u></p> <ol style="list-style-type: none"> 1. Political action committees (PACs) associated with the Company will select candidates to support based on the overall ability of the candidate to render meaningful public service. 2. The Company will not select candidates to support as a reflection of expected support of the candidate on any specific issue. 3. The Company will not coerce any colleague to participate in any PAC or any political activity on behalf of the Company.

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Individual Political Contributions.

1. The Company will not use contributions by Company colleagues to candidates to be an expression of the Company's position or agenda.
2. The Company will not pressure colleagues to use political contributions as a means of expressing corporate priorities on public policy issues.

Advocacy Advertising.

1. If the Company conducts any advocacy advertising, it will only articulate a position that can be shown to be:
 - a. in the larger public interest;
 - b. factual, accurate, and fully informative; and
 - c. intended to promote serious discussion on a public policy issue.
2. The Company expects trade associations with which it is affiliated to observe these same principles.

Hiring Former Government Employees.

The Company exercises care in the hiring of current and former government employees by involving the human resources and legal departments in such hiring decisions, and making them visible within the Company. For guidance related to the hiring of current and former Foreign Officials and their family members, please refer to the Global Anti-Corruption Policy, LL.AC.001.

Loaning Employees to Foreign Federal, State or Local Governments or Public Organizations.

The Company could receive a request by a federal, state or local government organization to loan a Company colleague to the government organization. Any such request must be approved by the Corporate Ethics and Compliance Steering Committee before the colleague may be loaned to the government organization. The Committee should approve such requests only infrequently and only after ensuring that no conflict of interest would exist.

The Company also could receive a request to loan a Company colleague to a foreign government organization or public international organization (e.g., World Health Organization, United Nations, etc.). Any such request must be approved by the Anti-Corruption Executive or designee before the colleague may be loaned to the government organization. The Anti-Corruption Responsible Executive or designee should approve such requests infrequently and only after ensuring that such a loan would not violate any applicable law or the Global Anti-Corruption Policy, LL.AC.001.

Gifts to Foreign, Federal, State and Local Public Officials.

1. Unless limited further by foreign, federal, state or local laws or regulations, the Company's Code of Conduct provisions on gifts and entertainment and the Global Anti-Corruption Policy, LL.AC.001, apply to foreign federal, state and local public officials, as well as representatives of corporate vendors and suppliers.
2. Company colleagues must consult Operations Counsel for advice regarding particular rules relating to gifts and entertainment for foreign, federal, state and local government officials before offering any gifts or entertainment to such individuals.

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PROCEDURE:

1. To ensure that trade associations with which the Company is associated are aware of the parameters surrounding the Company's participation in public policy debate and the political process, a copy of this policy will be provided to each major trade association with which the Company is associated.
2. 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:

Company Code of Conduct, Government Relations and Political Activities Section (see attachment)
Global Anti-Corruption Policy, [LL.AC.001](#)

Government Relations and Political Activities

The organization and its representatives comply with all federal, state, and local laws governing participation in government relations and political activities. As a general policy, HCA funds or resources are not contributed directly to individual political campaigns, political parties, or other organizations which intend to use the funds primarily for political campaign objectives. Those who seek exceptions to this general rule may only do so after obtaining the appropriate approvals required in relevant policies. Organization resources include financial and non-financial donations such as using work time and telephones to solicit for a political cause or candidate or the loaning of HCA property for use in the political campaign. The conduct of any political action committee is to be consistent with relevant laws and regulations. In addition, political action committees associated with the organization select candidates to support based on the overall ability of the candidate to render meaningful public service. The organization does not select candidates to support as a reflection of expected support of the candidate on any specific issue.

The organization engages in public policy debate only in a limited number of instances where it has special expertise that can inform the public policy formulation process. When the organization is directly impacted by public policy decisions, it may provide relevant, factual information about the impact of such decisions on the private sector. In articulating positions, the organization only takes positions that it believes can be shown to be in the larger public interest. The organization encourages trade associations with which it is associated to do the same.

It is important to separate personal and corporate political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. No use of corporate resources, including e-mail, is appropriate for personally engaging in political activity. A colleague may, of course, participate in the political process on his or her own time and at his or her own expense. While doing so, it is important HCA colleagues not give the impression they are speaking on behalf of or representing HCA in these activities. Colleagues cannot seek to be reimbursed by HCA for any personal contributions for such purposes.

At times, HCA may ask colleagues to make personal contact with government officials or to write letters to present our position on specific issues. In addition, it is a part of the role of some HCA management to interface on a regular basis with government officials. If a colleague is making these communications on behalf of the organization, he or she must be certain to be familiar with any regulatory constraints and observe them. Guidance is always available from the Corporate Government Relations and Legal Departments as necessary.