

A photograph of a male doctor with glasses and a white lab coat. He is holding a young child in his arms. The doctor is pointing his right index finger towards a city skyline visible through a window. The child is looking out the window. The scene is brightly lit, suggesting a sunny day. The text 'a tradition of caring' is overlaid on the left side of the image.

a tradition of caring

## Dear HCA Colleague,

We have a comprehensive, values-based Ethics and Compliance Program, which is a vital part of the way we conduct ourselves at HCA. Because the Program rests on our Mission and Values, it has easily become incorporated into our daily activities and supports our tradition of caring – for our patients, our communities, and our colleagues. We strive to deliver healthcare compassionately and to act with absolute integrity in the way we do our work and the way we live our lives.

This Code of Conduct, which reflects our tradition of caring, provides guidance to ensure our work is done in an ethical and legal manner. It emphasizes the shared common values and culture which guide our actions. It also contains resources to help resolve any questions about appropriate conduct in the work place. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to our future.

If you have questions regarding this Code or encounter any situation which you believe violates provisions of this Code, you should immediately consult your supervisor, another member of management at your facility, your Facility Human Resources Manager, your Facility Ethics and Compliance Officer, the HCA Ethics Line (1-800-455-1996) or the Corporate Ethics and Compliance Officer. You have our personal assurance there will be no retribution for asking questions or raising concerns about the Code or for reporting possible improper conduct.

No Code of Conduct can substitute for each person's own internal sense of fairness, honesty, and integrity. Thus, in your daily life and work, if you encounter a situation or are considering a course of action that does not feel right, please discuss the situation with any of the resources mentioned above.

We have a rich heritage, which is reflected in our Mission and Values Statement and in this Code of Conduct. We are equally committed to assuring our actions consistently reflect our words. In this spirit, we want this organization to be a community of shared values, and we expect all of our colleagues' actions to reflect the high standards set forth in this Code of Conduct. We ask you to assist us and all of our colleagues in this organization in supporting the values and principles that are critical to continuing our tradition of caring.

Sincerely,



*Jack O. Bovender, Jr.*

Jack O. Bovender, Jr.  
Chairman and Chief Executive Officer



*Richard M. Bracken*

Richard M. Bracken  
President and Chief Operating Officer



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*This Code of Conduct is effective April 15, 2003.*

*Note: All references to "HCA" or the "organization" in this Code of Conduct refer to HCA Inc. and/or its affiliates, as applicable.*

## Mission and Values Statement

Above all else, we are committed to the care and improvement of human life. In recognition of this commitment, we will strive to deliver high quality, cost-effective healthcare in the communities we serve. In pursuit of our mission, we believe the following value statements are essential and timeless:

- *We recognize and affirm the unique and intrinsic worth of each individual.*
- *We treat all those we serve with compassion and kindness.*
- *We act with absolute honesty, integrity and fairness in the way we conduct our business and the way we live our lives.*
- *We trust our colleagues as valuable members of our healthcare team and pledge to treat one another with loyalty, respect, and dignity.*

## 4

## Purpose of Our Code of Conduct

Our Code of Conduct provides guidance to all HCA colleagues and assists us in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with patients, affiliated physicians, third-party payers, subcontractors, independent contractors, vendors, consultants, and one another.

The Code is a critical component of our overall Ethics and Compliance Program. We have developed the Code to ensure we meet our ethical standards and comply with applicable laws and regulations.

The Code is intended to be comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject discussed has so much complexity that additional guidance is necessary for those directly involved with the particular area to have sufficient direction. To provide additional guidance, we have developed a comprehensive set of compliance policies and procedures which may be accessed on the Ethics and Compliance site of our Intranet, as well as our external web site at [www.hcahealthcare.com](http://www.hcahealthcare.com). Those policies expand upon or supplement many of the principles articulated in this Code of Conduct.

Though we promote the concept of management autonomy at local facilities in order to meet local needs, the standards set forth in the Code are mandatory and must be followed.

A separate Code of Conduct has been developed for our facilities outside the United States.

## Code of Ethics for Senior Financial Officers and the Chief Executive Officer

Under the Sarbanes-Oxley Act of 2002 and related Securities and Exchange Commission (SEC) rules, the Company is required to disclose whether it has adopted a written Code of Ethics for its Senior Financial Officers and the Chief Executive Officer (CEO). Any amendments to, or implicit or explicit waiver of, the Code of Ethics for Senior Financial Officers and the CEO must be publicly disclosed as required by SEC rules. "Senior Financial Officers" include, but are not limited to, facility, Division and Group Chief Financial Officers (CFOs) and controllers, and Corporate officers with financial accounting and reporting responsibilities, including the Controller and principal accounting officer. The Code must be reasonably designed to deter wrongdoing and to promote: honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; full, fair, accurate, timely and understandable SEC filings and submissions and other public communications by the Company; compliance with applicable governmental laws, rules and regulations;

prompt internal reporting of violations of the Code; and accountability for adherence to the Code.

The CEO and all Senior Financial Officers are bound by all provisions of this Code of Conduct and particularly those provisions relating to ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code. The CEO and all Senior Financial Officers also have responsibility for full, fair, accurate, timely and understandable disclosure in the periodic reports and submissions filed by the Company with the SEC as well as in other public communications made by the Company (“Public Communications”). Accordingly, it is the responsibility of the CEO and each Senior Financial Officer promptly to bring to the attention of the internal working group responsible for the review of the Company’s periodic SEC reports (“Disclosure Committee”) any information of which he or she may become aware that materially affects the disclosures made by the Company in its Public Communications. The CEO and each Senior Financial Officer also shall bring promptly to the attention of the Disclosure Committee any information he or she may have concerning significant deficiencies in the design or operation of internal controls which could adversely affect the company’s ability to record, process, summarize and report financial data; or any fraud, whether or not material, that involves management or other employees who have a significant role in the Company’s financial reporting, disclosures or internal controls.

The Corporate Ethics and Compliance Steering Committee shall determine appropriate actions to be taken in the event of violations of the Code by the CEO and the Company’s Senior Financial Officers. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code. In determining what action is appropriate in a particular case, the Corporate Ethics and Compliance Steering Committee shall take into account all relevant information, including the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question had committed other violations in the past. The Corporate Ethics and Compliance Steering Committee must report periodically any actions taken pursuant to this paragraph to the Ethics and Compliance Committee of the Board of Directors.

Any waiver of or amendments to the Code of Ethics for Senior Financial Officers and the CEO must be approved by the Ethics and Compliance Committee of the Company’s Board of Directors.

## Leadership Responsibilities

While all HCA colleagues are obligated to follow our Code, we expect our leaders to set the example, to be in every respect a model. We expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is kind, sensitive, thoughtful, and respectful. We expect each supervisor to create an environment where all team members feel free to raise concerns and propose ideas.

We also expect that they will ensure those on their team have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical dilemmas. They must help to create a culture within HCA which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of business objectives.

Specific guidance for leaders throughout the organization regarding their responsibilities under our Ethics and Compliance Program is included in a supplement for leaders to this Code. Leaders at all levels of the organization should use that guidance to most effectively incorporate ethics and compliance into all aspects of our organization.



## Our Fundamental Commitment to Stakeholders\*

We affirm the following commitments to HCA stakeholders:

*To our patients:* We are committed to providing quality care that is sensitive, compassionate, promptly delivered, and cost-effective.

*To our HCA colleagues:* We are committed to a work setting which treats all colleagues with fairness, dignity, and respect, and affords them an opportunity to grow, to develop professionally, and to work in a team environment in which all ideas are considered.

*To our affiliated physicians:* We are committed to providing a work environment which has excellent facilities, modern equipment, and outstanding professional support.

*To our third-party payers:* We are committed to dealing with our third-party payers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality healthcare and bringing efficiency and cost effectiveness to healthcare. We encourage our private third-party payers to adopt their own set of comparable ethical principles to explicitly recognize their obligations to patients as well as the need for fairness in dealing with providers.

*To our regulators:* We are committed to an environment in which compliance with rules, regulations, and sound business practices is woven into the corporate culture. We accept the responsibility to aggressively self-govern and monitor adherence to the requirements of law and to our Code of Conduct.

*To our joint venture partners:* We are committed to fully performing our responsibilities to manage our jointly owned facilities in a manner that reflects the mission and values of each of our organizations.

*To the communities we serve:* We are committed to understanding the particular needs of the communities we serve and providing these communities quality, cost-effective healthcare. We realize as an organization that we have a responsibility to help those in need. We proudly support charitable contributions and events in the communities we serve in an effort to promote good will and further good causes.

*To our suppliers:* We are committed to fair competition among prospective suppliers and the sense of responsibility required of a good customer. We encourage our suppliers to adopt their own set of comparable ethical principles.

*To our volunteers:* The concept of voluntary assistance to the needs of patients and their families is an integral part of the fabric of healthcare. We are committed to ensuring that our volunteers feel a sense of meaningfulness from their volunteer work and receive recognition for their volunteer efforts.

*To our shareholders:* We are committed to the highest standards of professional management, which we are certain can create unique efficiencies and innovative healthcare approaches and thus ensure favorable returns on our shareholders' investments over the long term.

\*The term "stakeholder" refers to those groups of individuals to whom an institution sees itself as having obligations.

## Our Patients

### Patient Care and Rights

Our mission is to provide high quality, cost-effective healthcare to all of our patients. We treat all patients with warmth, respect, and dignity and provide care that is both necessary and appropriate. We make no distinction in the availability of services; the admission, transfer or discharge of patients; or in the care we provide based on age, gender, disability, race, color, religion, or national origin.

Each patient is provided with a written statement of patient rights and a notice of privacy practices. These statements include the rights of a patient to make decisions regarding medical care and a patient's rights related to his or her health information maintained by the facility. Such statements conform to all applicable state and federal laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (hereinafter referred to as HIPAA).

We seek to involve patients in all aspects of their care, including giving consent for treatment and making healthcare decisions, which may include managing pain effectively, foregoing or withdrawing treatment, and, as appropriate, care at the end of life. As applicable, each patient or patient representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, right to refuse or accept care, care decision dilemmas, advance directive options, estimates of treatment costs, organ donation and procurement, and an explanation of the risks, benefits, and alternatives associated with available treatment options. Patients have the right to request transfers to other facilities. In such cases, the patient is given an explanation of the benefits, risks, and alternatives of the transfer.

Patients are provided information regarding their right to make advance directives. Patient advance directives or resuscitative measures are honored within the limits of the law and our organization's mission, philosophy, values, and capabilities.

In the promotion and protection of each patient's rights, each patient and his or her representatives are accorded appropriate confidentiality, privacy, security and protective services, opportunity for resolution of complaints, and pastoral care or spiritual care.

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. HCA facilities maintain processes to support patient rights in a collaborative manner which involves the facility leaders and others. These structures are based on policies and procedures, which make up the framework addressing both patient care and organizational ethics issues. These structures include informing each patient or, when appropriate, the patient's representative of the patient's rights in advance of furnishing or discontinuing care. Patients and, when appropriate, their families are informed about the outcomes of care, including unanticipated outcomes. Additionally, patients are involved as clinically appropriate in resolving dilemmas about care decisions. Additionally, facilities maintain processes for prompt resolution of patient grievances which include informing patients of whom to contact regarding



*Albert Einstein*

*Empathy is  
patiently and  
sincerely  
seeing the  
world through  
the other  
person's eyes.  
It is not  
learned in  
school; it is  
cultivated over  
a lifetime.*

grievances and informing patients regarding the grievance resolution. HCA facilities maintain an ongoing, proactive patient safety effort for the identification of risk to patient safety and the prevention, reporting and reduction of healthcare errors. HCA colleagues receive training about patient rights in order to clearly understand their role in supporting them.

We strive to provide health education, health promotion, and illness-prevention programs as part of our efforts to improve the quality of life of our patients and our communities.

### **Patient Information**

We collect information about the patient's medical condition, history, medication, and family illnesses to provide quality care. We realize the sensitive nature of this information and are committed to maintaining its confidentiality. Consistent with HIPAA, we do not use, disclose or discuss patient-specific information with others unless it is necessary to serve the patient or required by law.

HCA colleagues must never use or disclose confidential information that violates the privacy rights of our patients. In accordance with our appropriate access and privacy policies and procedures, which reflect HIPAA requirements, no HCA colleague, affiliated physician, or other healthcare partner has a right to any patient information other than that necessary to perform his or her job.

Subject only to emergency exceptions, patients can expect their privacy will be protected and patient-specific information will be released only to persons authorized by law or by the patient's written authorization.

### **Legal and Regulatory Compliance**

HCA provides varied healthcare services in many states. These services are provided pursuant to appropriate federal, state, and local laws and regulations, and the conditions of participation for Federal healthcare programs. Such laws, regulations, and conditions of participation may include, but are not limited to, subjects such as certificates of need, licenses, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, clinical research, end-of-life care decision-making, medical staff membership and clinical privileges, corporate practice of medicine restrictions, and Medicare and Medicaid program requirements. The organization is subject to numerous other laws in addition to these healthcare laws, regulations, and the conditions of participation.

We have developed policies and procedures to address many legal and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law and

regulation. Obviously, those laws and regulations not covered in organization policies and procedures must be followed. There is a range of expertise within the organization, including operations counsel and numerous functional experts (*i.e.*, Responsible Executives), who should be consulted for advice concerning human resources, legal, regulatory, and the conditions of participation requirements.

Anyone aware of violations or suspected violations of laws, regulations, the conditions of participation, or Company policies and procedures must report them immediately to a supervisor or member of management, the Facility Human Resources Manager, the Facility Ethics and Compliance Officer, the Ethics Line, or the Corporate Ethics and Compliance Officer.

### **Coding and Billing for Services**

We have implemented policies, procedures and systems to facilitate accurate billing to government payers, commercial insurance payers, and patients. These policies, procedures, and systems conform to pertinent federal and state laws and regulations. We prohibit any colleague or agent of HCA from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious, or fraudulent.

In support of accurate billing, medical records must provide reliable documentation of the services we render. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered part of the official medical record.

Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We expect those physicians to provide us with complete and accurate information in a timely manner.

Any subcontractors engaged to perform billing or coding services are expected to have the necessary skills, quality control processes, systems, and appropriate procedures to ensure all billings for government and commercial insurance programs are accurate and complete. HCA requires such entities to have their own ethics and compliance programs and code of conduct or to adopt HCA's code as their own. In addition, third-party billing entities, contractors, and preferred vendors under contract consideration must be approved consistent with the corporate policy on this subject.

For coding questions in a hospital or ambulatory surgery center contact the Coding Helpline at 1-800-537-1666. For questions regarding Health Information Management Services (HIMS) Policies and Procedures, contact the HIMS P & P Helpline at 1-800-690-0919 or e-mail at: HIMS P&P Helpline. For billing questions in a hospital, contact the Billing Helpline at 1-888-735-3669. For billing or coding questions in HCA Physician Services, call 1-800-373-5620, option 1.

*Sir Winston Churchill*

*We make a living by what we get, we make a life by what we give.*



## Cost Reports

We are required by federal and state laws and regulations to submit certain reports of our operating costs and statistics. We comply with federal and state laws, regulations, and guidelines relating to all cost reports. These laws, regulations, and guidelines define what costs are allowable and outline the appropriate methodologies to claim reimbursement for the cost of services provided to program beneficiaries.

Several HCA policies address cost report compliance and articulate our commitment to: maintain and distribute a Reimbursement Manual to Reimbursement Department personnel that includes corporate and departmental policies and procedures; provide effective and timely education and training programs for Reimbursement Department personnel regarding federal and state laws, regulations and guidelines, and corporate policies; maintain a standardized workpaper package to provide consistency in the preparation, organization, presentation, and review of cost reports; apply a uniform cost report review process; identify and exclude non-allowable costs; adhere to documentation standards; and use transmittal letters to report protested items and make other appropriate disclosures. Additionally, we submit our cost report process to internal audits and maintain a peer review process.

All issues related to the preparation, submission and settlement of cost reports must be performed by or coordinated with our Reimbursement Department.

## Emergency Treatment

We follow the Emergency Medical Treatment and Active Labor Act (“EMTALA”) in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of ability to pay. Provided we have the capacity and capability, anyone with an emergency medical condition is treated. In an emergency situation or if the patient is in labor, we will not delay the medical screening and necessary stabilizing treatment in order to seek financial and demographic information. We do not admit, discharge, or transfer patients with emergency medical conditions simply based on their ability or inability to pay or any other discriminatory factor.

Patients with emergency medical conditions are only transferred to another facility at the patient’s request or if the patient’s medical needs cannot be met at the HCA facility (*e.g.*, we do not have the capacity or capability) and appropriate care is knowingly available at another facility. Patients are only transferred in strict compliance with state and federal EMTALA regulatory and statutory requirements.

## Surveys

From time-to-time, government agencies and other entities conduct surveys in our facilities. We respond with openness and accurate information. In preparation for or during a survey or inspection, HCA colleagues must never conceal, destroy, or alter any documents; lie; or make misleading statements to the agency representative. Colleagues also must never attempt to cause another colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law.

## Accreditation

In preparation for, during and after surveys, HCA colleagues deal with all accrediting bodies in a direct, open and honest manner. No action should ever be taken in relationships with accrediting bodies that would mislead the accreditor or its survey teams, either directly or indirectly.

The scope of matters related to accreditation of various bodies is extremely significant and broader than the scope of this Code of Conduct. The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within the organization. Accrediting bodies may address issues of both wide and somewhat more focused interest.

## Business Information and Information Systems

### Accuracy, Retention, and Disposal of Documents and Records

Each HCA colleague is responsible for the integrity and accuracy of our organization's documents and records, not only to comply with regulatory and legal requirements but also to ensure records are available to support our business practices and actions. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities that which may be relevant to a government investigation.

Medical and business documents and records are retained in accordance with the law and our record retention policy, which includes comprehensive retention schedules. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities. It is important to retain and destroy records only according to our policy. HCA colleagues must not tamper with records. Additionally, no one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the Company records management policy.

### Information Security and Confidentiality

Confidential information about our organization's strategies and operations is a valuable asset. Although HCA colleagues may use confidential information to perform their jobs, it must not be shared with others unless the individuals and/or entities have a legitimate need to know the information in order to perform their specific job duties or carry out a contractual business relationship. In addition, these individuals and/or entities must have agreed to maintain the confidentiality of the information. Confidential information includes personnel data maintained by the organization; patient lists and clinical information; patient financial information; passwords; pricing and cost data; information pertaining to acquisitions, divestitures,

affiliations and mergers; financial data; details regarding federal, state, and local tax examinations of the organization or its joint venture partners; research data; strategic plans; marketing strategies and techniques; supplier and subcontractor information; and proprietary computer software. In order to maintain the confidentiality and integrity of patient and confidential information, such information should be sent through the Internet only in accordance with information security policies and standards, which require, among other things, that the individual and/or entity be validated and the information be encrypted.

We exercise due care and due diligence in maintaining the confidentiality, availability and integrity of information assets the Company owns or of which it is the custodian. Because so much of our clinical and business information is generated and contained within our computer systems, it is essential that each HCA colleague protect our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and guidance.

If an individual's employment or contractual relationship with HCA ends for any reason, the individual is still bound to maintain the confidentiality of information viewed, received or used during the employment or contractual business relationship with HCA. This provision does not restrict the right of a colleague to disclose, if he or she wishes, information about his or her own compensation, benefits, or terms and conditions of employment.

### **Electronic Media**

All communications systems, including but not limited to electronic mail, Intranet, Internet access, telephones, and voice mail, are the property of the organization and are to be used primarily for business purposes in accordance with electronic communications policies and standards. Limited reasonable personal use of HCA communications systems is permitted; however, users should assume these communications are not private. Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer and telephonic systems, and the Company reserves the right to monitor and/or access communications usage and content consistent with Company policies and procedures.

Colleagues may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly, or maliciously false materials; obscene materials; or anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages, or copyrighted documents that are not authorized for reproduction.

Colleagues who abuse our communications systems or use them excessively for non-business purposes may lose these privileges and be subject to disciplinary action.

*The best  
portion of a  
good person's  
life is the little,  
nameless,  
unremembered  
acts of  
kindness and  
of love.*

---

*William Wordsworth*

## Financial Reporting and Records

We have established and maintain a high standard of accuracy and completeness in documenting, maintaining, and reporting financial information. This information serves as a basis for managing our business and is important in meeting our obligations to patients, colleagues, shareholders, suppliers, and others. It is also necessary for compliance with tax and financial reporting requirements.

All financial information must reflect actual transactions and conform to generally-accepted accounting principles. All funds or assets must be properly recorded in the books and records of the Company. HCA maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets.

We diligently seek to comply with all applicable auditing, accounting and financial disclosure laws, including but not limited to the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002. Senior financial officers receive training and guidance regarding auditing, accounting and financial disclosure relevant to their job responsibilities. They are also provided the opportunity to discuss issues of concern with the Board of Directors' Audit Committee. Anyone having concerns regarding questionable accounting or auditing matters should report such matters to the Board of Directors' Audit Committee by calling the HCA Ethics Line (1-800-455-1996).

## Workplace Conduct and Employment Practices

### Conflict of Interest

A conflict of interest may occur if an HCA colleague's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions in the course of the colleague's job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract a colleague from the performance of his or her job or cause the individual to use HCA resources for other than HCA purposes. HCA colleagues are obligated to ensure they remain free of conflicts of interest in the performance of their responsibilities at HCA. If colleagues have any question about whether an outside activity or personal interest might constitute a conflict of interest, they must obtain the approval of their supervisor before pursuing the activity or obtaining or retaining the interest. Clinical decisions will be made without regard to compensation or financial risk to HCA leaders, managers, clinical staff, or licensed, independent practitioners.

No waiver of this conflict of interest provision may be granted to an Executive Officer (*i.e.*, an officer subject to Section 16 of the Securities Exchange Act of 1934) unless approved in advance by the Ethics and Compliance Committee of the Company's Board of Directors.



### Controlled Substances

Some of our colleagues routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals to minimize risks to us and to patients. If one becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organization, the incident must be reported immediately.

### Copyrights

HCA colleagues may only use copyrighted materials pursuant to the organization's policy on such matters.

### Diversity and Equal Employment Opportunity

Our colleagues provide us with a wide complement of talents which contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect. We comply with all laws, regulations, and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

No one shall discriminate against any individual with regard to race, color, religion, sex, national origin, age, disability, sexual orientation, or status as a Vietnam-era or special disabled veteran with respect to any offer, or term or condition, of employment. We make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities.

### Harassment and Workplace Violence

Each HCA colleague has the right to work in an environment free of harassment and disruptive behavior. We do not tolerate harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Sexual harassment is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at HCA.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the

*I think one's feelings waste themselves in words; they ought all to be distilled into actions which bring results.*

*Florence Nightingale*

employer, terrorism, and hate crimes committed by current or former colleagues. Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, a member of management, the Facility Ethics and Compliance Officer, or the Ethics Line.

### **Health and Safety**

All HCA facilities comply with all government regulations and rules, HCA policies, and required facility practices that promote the protection of workplace health and safety. Our policies have been developed to protect our colleagues from potential workplace hazards. Colleagues must become familiar with and understand how these policies apply to their specific job responsibilities and seek advice from their supervisor or the Safety Officer whenever they have a question or concern. It is important that each colleague immediately advise his or her supervisor or the Safety Officer of any serious workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

### **Hiring of Former and Current Government and Fiscal Intermediary Employees**

The recruitment and employment of former or current U.S. government employees may be impacted by regulations concerning conflicts of interest. Hiring employees directly from a fiscal intermediary requires certain regulatory notifications. Colleagues should consult with the Corporate Human Resources Department or the Legal Department regarding such recruitment and hiring.

### **Insider Information and Securities Trading**

In the course of colleagues' employment with HCA, they may become aware of non-public information about HCA material to an investor's decision to buy or sell the organization's securities. Non-public, material information may include plans for mergers, marketing strategy, financial results, or other business dealings. Colleagues may not discuss this type of information with anyone outside of the organization. Within the organization, colleagues should discuss this information on a strictly "need to know" basis only with other colleagues who require this information to perform their jobs.

Securities law and HCA policy prohibit individuals from trading in the marketable securities of a publicly held organization or influencing others to trade in such securities on the basis of non-public, material information. These restrictions are meant to ensure the general public has complete and timely information on which to base investment decisions.

If an HCA colleague obtains access to non-public, material information about the organization or any other company while performing his or her job, the colleague may not use that information to buy, sell, or retain securities of HCA or that other company. Even if he or she does not buy or sell securities based on what he or she knows, discussing the information with others, such as family members, friends, vendors, suppliers, and other outside acquaintances, is prohibited until the information is considered to be public. Information is considered to be public two days after a general release of the information to the media.



## Interactions with Physicians

Federal and state laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. The applicable federal laws include the Anti-Kickback Law and the Stark Law. It is important that those colleagues who interact with physicians, particularly regarding making payments to physicians for services rendered, leasing space, recruiting physicians to the community, and arranging for physicians to serve in leadership positions in facilities, are aware of the requirements of the laws, regulations, and policies that address relationships between facilities and physicians.

If relationships with physicians are properly structured, but not diligently administered, failure to administer the arrangements as agreed may result in violations of the law. Any business arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures and with any operational guidance that has been issued. Most arrangements must be in writing and approved by the Legal Department.

Keeping in mind that it is essential to be familiar with the laws, regulations, and policies that govern our interactions with physicians, two overarching principles govern our interactions with physicians:

*We do not pay for referrals.* We accept patient referrals and admissions based solely on the patient's medical needs and our ability to render the needed services. We do not pay or offer to pay anyone – colleagues, physicians, or other persons or entities – for referral of patients.

*We do not accept payments for referrals we make.* No HCA colleague or any other person acting on behalf of the organization is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when making patient referrals to another healthcare provider, we do not take into account the volume or value of referrals that the provider has made (or may make) to us.

## License and Certification Renewals

Colleagues, individuals retained as independent contractors, and privileged practitioners in positions which require professional licenses, certifications, or other credentials are responsible for maintaining the current status of their credentials and shall comply at all times with federal and state requirements applicable to their respective disciplines. To assure compliance, HCA may require evidence of the individual having a current license or credential status.

HCA does not allow any colleague, independent contractor or privileged practitioner to work without valid, current licenses or credentials.

### **Personal Use of HCA Resources**

It is the responsibility of each HCA colleague to preserve our organization's assets including time, materials, supplies, equipment, and information. Organization assets are to be maintained for business-related purposes. As a general rule, the personal use of any HCA asset without prior supervisory approval is prohibited. The occasional use of items, such as copying facilities or telephones, where the cost to HCA is insignificant, is permissible. Any community or charitable use of organization resources must be approved in advance by one's supervisor. Any use of organization resources for personal financial gain unrelated to the organization's business is prohibited.

### **Relationships Among HCA Colleagues**

In the normal day-to-day functions of an organization like HCA, there are issues that arise which relate to how people in the organization deal with one another. It is impossible to foresee all of these, and many do not require explicit treatment in a document like this. A few routinely arise, however. One involves gift giving among colleagues for certain occasions. While we wish to avoid any strict rules, no one should ever feel compelled to give a gift to anyone, and any gifts offered or received should be appropriate to the circumstances. A lavish gift to anyone in a supervisory role would clearly violate organization policy. Another situation, which routinely arises, is a fund-raising or similar effort undertaken by individual colleagues, in which no one should ever be compelled to participate. Similarly, when the Company or a facility determines to support charitable organizations such as the United Way, no colleague should be compelled to contribute to the charitable organization, nor should there be any workplace consequences of such non-participation.

### **Relationships with Subcontractors and Suppliers**

We must manage our subcontractor and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of subcontractors, suppliers, and vendors will be made on the basis of objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. Our purchasing decisions will be made on the supplier's ability to meet our needs, and not on personal relationships and friendships. We employ the highest ethical standards in business practices in source selection, negotiation, determination of contract awards, and the administration of all purchasing activities. We do not communicate to a third-party confidential information given to us by our suppliers unless directed in writing to do so by the supplier. We do not disclose contract pricing and information to any outside parties. (The subject of Business Courtesies, which might be offered by or to subcontractors or suppliers, is discussed on pages 26 to 29 of this Code.)

*Pablo Casals*

*I feel the capacity to care is the thing which gives life its deepest significance.*

*Helen Keller*

*When we do  
the best that  
we can, we  
never know  
what miracle  
is wrought in  
our life, or in  
the life of  
another.*

### **Research, Investigations, and Clinical Trials**

We follow high ethical standards and comply with federal and state laws and regulations in any research, investigations and clinical trials conducted by our physicians and professional staff. We do not tolerate intentional research misconduct. Research misconduct includes making up or changing results or copying results from other studies without performing the clinical investigation or research. Our hospitals protect the patients and respect their rights during research, investigations, and clinical trials.

All patients asked to participate in a clinical investigation or research project are given a full explanation of alternative services that might prove beneficial to them. They are also fully informed of potential discomforts and are given a full explanation of the risks, expected benefits, and alternatives. The patients are fully informed of the procedures to be followed, especially those that are experimental in nature. Refusal of a patient to participate in a research study will not compromise his or her access to services. Patient informed consent to participate in clinical investigations or research is documented and retained pursuant to Company and hospital policies.

Any HCA facility or colleague applying for or performing research of any type is responsible for maintaining the highest ethical standards in any written or oral communications regarding the research project as well as following appropriate research guidelines. As in all accounting and financial record-keeping, our policy is to submit only true, accurate, and complete costs related to research grants. Any HCA facility or colleague engaging in human subject research must do so in conjunction with an Institutional Review Board (IRB) and consistent with Company policies regarding human subject research and IRBs.

### **Ineligible Persons**

We do not contract with, employ, or bill for services rendered by an individual or entity that is excluded or ineligible to participate in Federal healthcare programs; suspended or debarred from Federal government contracts; or has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated in a Federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility, provided that we are aware of such criminal offense. We routinely search the Department of Health and Human Services' Office of Inspector General and General Services Administration's lists of such excluded and ineligible persons. A number of Company policies address the procedures for timely and thorough review of such lists and appropriate enforcement actions.

Colleagues, vendors, and privileged practitioners at one or more HCA facilities are required to report to us if they become excluded, debarred, or ineligible to participate in Federal healthcare programs; or have been convicted of a criminal offense related to the provision of healthcare items or services.

### **Substance Abuse and Mental Acuity**

To protect the interests of our colleagues and patients, we are committed to an alcohol and drug-free work environment. All colleagues must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in a colleague's system; or using, possessing, or selling illegal drugs while on HCA work time or property may result in immediate termination. We may use drug testing as a means of enforcing this policy.

It is also recognized individuals may be taking prescription or over-the-counter drugs, which could impair judgment or other skills required in job performance. Colleagues with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of his or her job must immediately consult with their supervisor.

## **Marketing Practices**

### **Antitrust**

Antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws could be violated by discussing HCA business with a competitor, such as how our prices are set, disclosing the terms of supplier relationships, allocating markets among competitors, or agreeing with a competitor to refuse to deal with a supplier. Our competitors are other health systems and facilities in markets where we operate.

At trade association meetings, colleagues must be alert to potential situations where it may not be appropriate to participate in discussions regarding prohibited subjects with competitors. Prohibited subjects include any aspect of pricing, our services in the market, key costs such as labor costs, and marketing plans. If a competitor raises a prohibited subject, colleagues must end the conversation immediately. Colleagues must document their refusal to participate in the conversation by requesting their objection be reflected in the meeting minutes and notify the Legal Department of the incident.

In general, colleagues avoid discussing sensitive topics with competitors or suppliers, unless they are proceeding with the advice of the Legal Department. Colleagues also must not provide any information in response to an oral or written inquiry concerning an antitrust matter without first consulting the Legal Department.

### **Gathering Information about Competitors**

It is not unusual to obtain public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, colleagues should avoid seeking or receiving information about a competitor through other non-public means if they know or have reason to believe the information is proprietary or confidential. For example, a colleague should not seek proprietary or confidential information when doing so would require anyone to violate a contractual agreement, such as a confidentiality agreement with a prior employer.



*Dr. Karl Menninger*

*Loyalty means that I share a common ideal with you and that, regardless of minor differences, we strive for it, shoulder to shoulder, confident in one another's good faith, trust, constancy and affection.*

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### **Marketing and Advertising**

We may use marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services, and to recruit colleagues. We present only truthful, fully informative, and non-deceptive information in these materials and announcements.

### **Foreign Corrupt Practices Act**

The United States Foreign Corrupt Practices Act (FCPA) requires us to exercise care in our dealings with foreign government officials, employees, or representatives; and members of their families. The FCPA prohibits providing anything of value to any of these individuals for the purpose of obtaining or retaining business. Under the FCPA, HCA is responsible for the actions of its agents and representatives. Before offering anything of value to foreign government officials, employees or representatives or a member of their family, an HCA colleague must obtain advice from the Corporate Ethics and Compliance Department or the Legal Department.

### **Environmental Compliance**

It is our policy to comply with all environmental laws and regulations as they relate to our organization's operations. We act to preserve our natural resources to the full extent reasonably possible. We comply with all environmental laws and operate each of our facilities with the necessary permits, approvals, and controls. We diligently employ the proper procedures to provide a good environment of care and to prevent pollution.

In helping HCA comply with these laws and regulations, all HCA colleagues must understand how job duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert supervisors to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation which may be potentially damaging to the environment.

### **Business Courtesies**

#### **General**

This part of the Code of Conduct should not be considered in any way as an encouragement to make, solicit, or receive any type of entertainment or gift. For clarity purposes, please note that these limitations govern activities with those outside of HCA. This section does not pertain to actions between HCA and its colleagues or actions among HCA colleagues themselves. (See "Relationships Among HCA Colleagues" on page 22.)

## Receiving Business Courtesies

We recognize there will be times when a current or potential business associate, including a potential referral source, may extend an invitation to attend a social event in order to further develop a business relationship. An HCA colleague may accept such invitations, provided: (1) the cost associated with such an event is reasonable and appropriate, which, as a general rule, means the cost will not exceed \$100.00 per person; (2) no expense is incurred for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging; and (3) such events are infrequent. The limitations of this section do not apply to business meetings at which food (including meals) may be provided. Prior to accepting invitations to training and educational opportunities that include travel and overnight accommodations at reduced or no cost to a colleague or HCA, consult our policies and seek appropriate approvals.

HCA colleagues may accept gifts with a total value of \$50.00 or less in any one year from any individual or organization who has a business relationship with HCA. For purposes of this paragraph, physicians practicing in HCA facilities are considered to have such a relationship. Perishable or consumable gifts given to a department or group are not subject to any specific limitation. HCA colleagues may accept gift certificates, but may never accept cash or financial instruments (e.g., checks, stocks). Finally, under no circumstances may an HCA colleague solicit a gift.

This section does not limit HCA facilities from accepting gifts, provided they are used and accounted for appropriately.

## Extending Business Courtesies to Non-referral Sources

No portion of this section, “Extending Business Courtesies to Non-referral Sources,” applies to any individual who makes, or is in a position to make, referrals to an HCA facility. Such business courtesies are addressed in the *Extending Business Courtesies to Possible Referral Sources* section of this Code and Company policies.

There may be times when a colleague wishes to extend to a current or potential business associate (other than someone who may be in a position to make a patient referral) an invitation to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to further or develop a business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general rule, this means the cost will not exceed \$100.00 per person. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four times per year. Consult Company policy for events that are expected to exceed \$100 or were not expected to but inadvertently do exceed \$100. That policy requires establishing the business necessity and appropriateness of the proposed entertainment. The organization will under no circumstances sanction participation in any business entertainment that might be considered lavish. Departures from the \$100.00 guideline are highly discouraged.

Also, HCA facilities may routinely sponsor events with a legitimate business purpose (e.g., hospital board

*Sir William Osler*

*The trained nurse has become one of the great blessings of humanity.*



meetings or retreats). Provided that such events are for business purposes, reasonable and appropriate meals and entertainment may be offered. In addition, transportation and lodging can be paid for. However, all elements of such events, including these courtesy elements, must be consistent with the corporate policy on such events.

It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with HCA. We will never use gifts or other incentives to improperly influence relationships or business outcomes. Gifts to business associates who are not government employees must not exceed \$50.00 per year per recipient. Any gifts to Medicare or Medicaid beneficiaries must not exceed \$10.00 per item nor total more than \$50.00 per year per recipient. An HCA colleague or facility may give gift certificates, but may never give cash or financial instruments (*e.g.*, checks, stocks). The corporate policy on business courtesies permits occasional exceptions to the \$50 limit to recognize the efforts of those who have spent meaningful amounts of volunteer time on behalf of HCA.

U.S. Federal and state governments have strict rules and laws regarding gifts, meals, and other business courtesies for their employees. HCA does not provide any gifts, entertainment, meals, or anything else of value to any employee of the Executive Branch of the Federal government, except for minor refreshments in connection with business discussions or promotional items with the HCA or facility logo valued at no more than \$10.00. With regard to gifts, meals, and other business courtesies involving any other category of government official or employee, colleagues must determine the particular rules applying to any such person and carefully follow them.

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### **Extending Business Courtesies to Possible Referral Sources**

Any entertainment or gift involving physicians or other persons who are in a position to refer patients to our healthcare facilities must be undertaken in accordance with corporate policies, which have been developed consistent with federal laws, regulations, and rules regarding these practices. HCA colleagues must consult Company policies prior to extending any business courtesy to a potential referral source.

## **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. Additionally, 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. 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

*Albert Schweitzer*

*There is no higher religion than human service. To work for the common good is the greatest creed.*

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.

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## **The Company's Ethics and Compliance Program**

### **Program Structure**

The Ethics and Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. The elements of the program include setting standards (the Code and Policies and Procedures), communicating the standards, providing a mechanism for reporting potential exceptions, monitoring and auditing, and maintaining an organizational structure that supports the furtherance of the program. Each of these elements is detailed below.

These elements are supported at all levels of the organization. Providing direction, guidance and oversight are the Ethics and Compliance Committee of the Board of Directors; the Corporate Ethics and Compliance Steering Committee consisting of senior management; and the Corporate Ethics and Compliance Policy Committee consisting of senior management and three facility CEOs.

The Senior Vice President for Ethics, Compliance and Corporate Responsibility, who serves as the Corporate Ethics and Compliance Officer, and the Ethics and Compliance Department are responsible for the day-to-day direction and implementation of the Ethics and Compliance Program. This includes developing resources (including policies and procedures, training programs, and communication tools) for and providing support (including operating the Ethics Line, conducting program assessment, and providing advice) to Facility Ethics and Compliance Officers (ECOs) and others.

Responsible Executives are individuals in the Corporate Office who have expertise in various areas of compliance risk and who are called upon in their areas of expertise to lead policy and training development efforts, conduct monitoring and auditing as appropriate, and provide advice.

Playing a key role in ensuring the successful implementation of our Ethics and Compliance Program, Facility ECOs are responsible for distributing standards, ensuring training is conducted, conducting monitoring and responding to audits, investigating and resolving Ethics Line cases, and otherwise administering the Ethics and Compliance Program in their facilities. Hospital ECOs are also expected to establish and maintain a Facility Ethics and Compliance Committee (FECC) to assist them in these efforts. Some Divisions have appointed Division ECOs. Those individuals assist in directing and assessing the Ethics and Compliance Program for their divisions.

Another important resource who may be able to address issues arising out of this Code of Conduct is the Human Resources Manager. Human Resources Managers are highly knowledgeable about many of the compliance risk areas described in this Code of Conduct that pertain to employment and the workplace and are responsible for ensuring compliance with various employment laws. If a concern relates to specific details of an individual's work situation, rather than larger issues of organizational ethics and compliance, the Human Resources Manager is the most appropriate person to contact. In that we promote the concept of management autonomy at local facilities, every effort should be made to resolve workplace conduct and employment practice issues through the individual's supervisor and the Human Resources Manager at the local facility. Experience has shown that this is an effective and productive way to deal promptly with these matters. Some Divisions have appointed Division Human Resources Managers who assist in investigating and resolving Ethics Line cases and workplace conduct and employment practices issues.

All of these individuals or groups are prepared to support HCA colleagues in meeting the standards set forth in this Code. Membership lists for each of the Corporate entities and the Facility ECOs can be found at the Ethics and Compliance site on the organization's Intranet.

### **Corporate Integrity Agreement**

In conjunction with settling a federal investigation, on January 25, 2001, HCA entered into a Corporate Integrity Agreement (CIA) with the U.S. Department of Health and Human Services' Office of Inspector General. The CIA, which will be in effect for 8 years, requires us to maintain our Ethics and Compliance Program, report certain potential violations of Federal healthcare program laws to the government, subject certain aspects of our Ethics and Compliance Program to internal and external audits, and submit reports to the Federal government regarding our Program. The full text of the CIA and accompanying information is available on our Intranet and Internet sites.

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*Washington Irving*

*A kind heart  
is a fountain  
of gladness,  
making  
everything in  
its vicinity  
freshen into  
smiles.*

## Setting Standards

With respect to our Ethics and Compliance Program, we set standards through this Code of Conduct, ethics and compliance policies and procedures and, occasionally, through other guidance mechanisms, such as Compliance Alerts and advisory memoranda. It is the responsibility of each individual to be aware of those policies and procedures that pertain to his or her work and to follow those policies and procedures.

## Training and Communication

Comprehensive training and education has been developed to ensure that colleagues throughout the organization are aware of the standards that apply to them. Code of Conduct training is conducted at the time an individual joins the organization and annually for all colleagues. Compliance training in areas of compliance risk (*e.g.*, billing, coding, cost reports) is required of certain individuals. Company policies outline the training requirements.

All ethics and compliance training is required to be recorded in the Company's Learning Management System (LMS). Through the LMS, system administrators and ECOs track colleagues' compliance with their training requirements and report such information as necessary.

Many resources regarding our program are available to all HCA colleagues on our Intranet and to the general public on the Internet. We encourage all colleagues to frequently visit both sites.

## Resources for Guidance and Reporting Concerns

To obtain guidance on an ethics or compliance issue or to report a concern, individuals may choose from several options. We encourage the resolution of issues, including human resources-related issues (*e.g.*, payroll, fair treatment and disciplinary issues), at a local level. Colleagues should use the human resources-related problem solving procedure at their facility to resolve such issues. It is an expected good practice, when one is comfortable with it and think it appropriate under the circumstances, to raise concerns first with one's supervisor. If this is uncomfortable or inappropriate, the individual may discuss the situation with the Facility Human Resources Manager, the Facility ECO, or another member of management at the facility or in the organization. Individuals are always free to contact the Ethics Line at 1-800-455-1996.

HCA makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. There is no retribution or discipline for anyone who reports a concern in good faith. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague is subject to discipline.





### Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Each colleague has an individual responsibility for reporting any activity by any colleague, physician, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, accreditation standards, standards of medical practice, Federal healthcare conditions of participation, or this Code. If a matter that poses serious compliance risk to the organization or that involves a serious issue of medical necessity, clinical outcomes or patient safety is reported locally, and if the reporting individual doubts that the issue has been given sufficient or appropriate attention, the individual should report the matter to higher levels of management or the Ethics Line until satisfied that the full importance of the matter has been recognized.

### Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. The Corporate Ethics and Compliance Officer coordinates any findings from corporate-led investigations and immediately recommends corrective action or changes that need to be made. We expect all colleagues to cooperate with investigation efforts.

### Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future.

### Discipline

All violators of the Code will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any or all of the following disciplinary actions:

- *Oral warning;*
- *Written warning;*
- *Written reprimand;*
- *Suspension;*
- *Termination; and/or*
- *Restitution.*

*Bettering the human condition is the greatest good any individual can achieve.*

*Dr. Thomas F. Frist, Jr.*

## Measuring Program Effectiveness

We are committed to assessing the effectiveness of our Ethics and Compliance Program through various efforts. Much of this effort is provided by the Internal Audit & Consulting Services Department, which routinely conducts internal audits of issues that have regulatory or compliance implications. Responsible Executives routinely undertake monitoring efforts in support of policies and compliance in general. Facilities conduct self-monitoring, and the Ethics and Compliance Department conducts reviews of hospital ethics and compliance programs designed to assess facility implementation of the Code, policies and procedures, Ethics Line and related investigations, and monitoring efforts. These compliance process reviews permit the Ethics and Compliance Department to identify and share best practices.

Most of these methods of assessment result in reports of findings by the reviewers and corrective action plans by the facilities that are reviewed. Through these reviews, we are continuously assessing the effectiveness of the Program and finding ways to improve it.

## Acknowledgment Process

HCA requires all colleagues to sign an acknowledgment confirming they have received the Code, understand it represents mandatory policies of HCA and agree to abide by it. New colleagues are required to sign this acknowledgment as a condition of employment. Each HCA colleague is also required to participate in annual Code of Conduct training, and records of such training must be retained by each facility.

Adherence to and support of HCA's Code of Conduct and participation in related activities and training is considered in decisions regarding hiring, promotion, and compensation for all candidates and colleagues. New colleagues must receive Code of Conduct training within 30 days of employment.

*This Code includes several quotations from various individuals. Brief background information about each individual follows:*

Pablo Casals was a world-renowned cellist, conductor, and composer.

Sir Winston Churchill was a British statesman and author. He served as Prime Minister of Britain during World War II and in the early 1950s.

Albert Einstein was a physicist who developed the special and general theories of relativity and other critically important natural science concepts.

Ralph Waldo Emerson was a lecturer, poet, and essayist who lived and wrote in Massachusetts in the nineteenth century.

Dr. Thomas F. Frist, Sr. was a highly regarded physician who practiced in Nashville, Tennessee. He was a co-founder of the Hospital Corporation of America.

John W. Gardner was the Secretary of Education of the United States and the author of the highly regarded book *Excellence*.

Washington Irving was a highly regarded American writer from the early nineteenth century, probably best known for writing *Rip Van Winkle* and *The Legend of Sleepy Hollow*.

Helen Keller was an author and educator, whose education and training represent an extraordinary accomplishment for someone who was both blind and deaf from early childhood.

Dr. Karl Menninger was a physician who pioneered methods of psychiatric treatment.

Florence Nightingale was an English nurse and the founder of trained nursing as a profession.

Sir William Osler was a physician and professor of medicine. He is widely recognized for having transformed the organization and curriculum of medical education, by placing primary emphasis on clinical experience.

Albert Schweitzer was a theologian, philosopher, organist, and mission doctor in equatorial Africa.

Justice Potter Stewart was an associate justice on the United States Supreme Court.

William Wordsworth was a renowned English poet who served as the poet laureate of England in the mid-nineteenth century.



## Acknowledgment Card

I certify that I have received the HCA Code of Conduct, understand it represents mandatory policies of the organization and agree to abide by it.

Signature

Printed Name  
(as listed in personnel records)

Department

Facility

Social Security Number

Date

# HCA

Please tear off, fold and keep this wallet card with you at all times.

### Mission and Values Statement

Above all else, we are committed to the care and improvement of human life. In recognition of this commitment, we will strive to deliver high quality, cost-effective healthcare in the communities we serve.

In pursuit of our mission, we believe the following value statements are essential and timeless:

- We recognize and affirm the unique and intrinsic worth of each individual.
- We treat all those we serve with compassion and kindness.
- We act with absolute honesty, integrity and fairness in the way we conduct our business and the way we live our lives.
- We trust our colleagues as valuable members of our healthcare team and pledge to treat one another with loyalty, respect, and dignity.

#### Resources:

For coding questions in a hospital or ambulatory surgery center, contact the Coding Helpline at 1-800-537-1666.

For questions regarding HIMS Policies and Procedures, contact the HIMS P & P Helpline at 1-800-690-0919 or e-mail at: [HIMS P&P Helpline](mailto:HIMS_P&P_Helpline).

For billing questions in a hospital, contact the Billing Helpline at 1-888-735-3669.

For billing or coding questions in HCA Physician Services, call 1-800-373-5620, option 1.

To get help with an ethics or compliance concern or to report a potential violation of our Code of Conduct, contact your supervisor, another member of local management, your facility Ethics and Compliance Officer or the Ethics Line: 1-800-455-1996.

# HCA

a tradition  
of caring



# HCA

Please tear  
off, fold and  
keep this  
wallet card   
with you at  
all times.

# HCA

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