



HEALTHTRUST®

Code of Conduct



Dear HealthTrust Colleague,

We have established this Code of Conduct as the foundation upon which we base our everyday conduct at HealthTrust. Following this Code enables us to best fulfill our mission:

HealthTrust is committed to strengthening provider performance and clinical excellence through an aligned membership model and the delivery of total spend management advisory solutions that leverage our operator experience, scale and innovation.

This Code of Conduct provides guidance to ensure our work is done in an ethical and legal manner. It emphasizes the shared common values and culture that guide our actions. It also contains resources to help resolve questions about appropriate conduct in the workplace. Please review it thoroughly. Your adherence to its spirit, as well as its specific provisions, is absolutely critical to fulfilling our mission and maintaining a healthy work environment.

If you have questions about this Code, or if you encounter any situation that you believe may violate a provision of this Code, you should immediately consult your supervisor; another member of HealthTrust management; HealthTrust's Ethics and Compliance Officer; the local Ethics and Compliance Officer at your facility in the U.S., HealthTrust Europe in the U.K. or our Shanghai, China office; or the HealthTrust Ethics Line phone numbers that you will find at the back of this Code. You have my personal assurance that there will be no retribution against you for asking questions or raising concerns about this 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, if you encounter a situation or are considering a course of action that does not feel right, please discuss it with any of the resources mentioned above.

Our mutual efforts to support the values and principles of this Code of Conduct will enable HealthTrust to provide industry-leading total spend management solutions to all of our members and clients.

Sincerely,



Edward Jones
President and Chief Executive Officer

Contents

Mission and Values Statement	5	Competitive Activities and Marketing Practices	25
Purpose of Our Code of Conduct	6	Global Anti-corruption and Bribery	
Leadership Responsibilities	7	Antitrust and Unfair Competition	
Our Fundamental Commitment to Stakeholders	8	Gathering Information About Suppliers or Competitors	
HealthTrust Self-Guidance Standards	9	Marketing and Advertising	
Relationships with Suppliers	10	Conflict of Interest	29
HGPII		Sustainability	31
New Technologies		Other Legal and Regulatory Matters	32
Participation by Suppliers in HealthTrust Events		Audits, Surveys, Inspections	
Participation by HealthTrust Colleagues in Educational, Training and Promotional Events of Others		Fraud	
Physician-owned Suppliers		Government Relations and Political Activities	
Charitable Activities		Hiring of Former or Current Government Employees	
Business and Financial Information	14	Ineligible Persons	
Accuracy, Retention and Disposal of Documents and Records		Insider Information and Securities Trading	
Confidential Information		Interactions with Physicians	
Electronic Media		Intellectual Property Rights and Obligations	37
Financial Reporting and Records		Copyright	
Patient Information		Rights to Developments	
Business Courtesies	20	Workplace Conduct and Employment Practices	39
Limitations on Value of Business Courtesies		Human Trafficking and Forced Labor	
Limitations on Gifts		Diversity and Equal Employment Opportunity	
Perishable or Consumable Gifts		Harassment and Workplace Violence	
Limitations on Expenditures for Food and Beverages, and Entertainment		Health and Safety	
Limitations on Expenditures for Travel		License and Certification Renewals	
Overall Total Expenditures per Year		Personal Use of HealthTrust Resources	
Other Rules on Business Courtesies		Relationships Among HealthTrust Colleagues	
Extending Business Courtesies to Government Employees, Representatives or Officials		Substance Abuse and Mental Acuity	
Extending Business Courtesies to Physicians who are Potential Referral Sources		Use of Social Media	
Quiet Period		Public Speaking	

The Company's Ethics and Compliance Program 44

Program Structure
Setting Standards
Training and Communication
Resources for Guidance and Reporting Concerns
Personal Obligation to Report
Internal Investigations of Reports
Corrective Action
Discipline
Measuring Program Effectiveness
Acknowledgment Process

SUPPLEMENT FOR THOSE WHO SOMETIMES WORK IN HEALTHCARE FACILITIES

Patients 49
Quality of Care and Patient Safety
Workplace Conduct and Employment Practices in a Healthcare Facility 50
Controlled Substances
Research, Investigations and Clinical Trials
To Obtain Further Guidance or Report a Suspected Violation 52
Ethics and Compliance Officers' Contact Information 52
Ethics Line Phone Numbers 53
Acknowledgment Card 54

Definitions and Effective Date

This Code of Conduct is effective January 1, 2021.

Some defined terms:

- **“Client”** means a customer of HealthTrust that receives fee-based consulting services from HealthTrust and, in some cases, custom contracting or other services.
- **“Equity partners”** means the limited partners of HealthTrust Purchasing Group, L.P.
- **“General partner”** means HPG Enterprises, LLC, the general partner of HealthTrust.
- **“HealthTrust”**, the **“organization”**, or the **“Company”** means HealthTrust Purchasing Group, L.P. and/or its affiliates, as applicable, including HealthTrust Europe LLP, and the Representative Office of HealthTrust in Shanghai, China.
- **“HealthTrust advisory board”** or **“advisory board”** means the HealthTrust Partner Advisory Committee, the Supply Chain Board, or and any other advisory board or committee established by HealthTrust, comprised of member representatives, and whose purpose is to provide input and recommendations related to supplier contracting and other HealthTrust matters, including HealthTrust Europe’s evaluation panels.
- **“HealthTrust colleague”** or **“colleague”** means an individual who works full- or part-time for HealthTrust, or an advisory board member.
- **“HealthTrust Partner Advisory Committee”** means the advisory committee made up of representatives of the partners of HealthTrust Purchasing Group, L.P.
- **“Member”** means an organization that has signed a Participation Agreement with HealthTrust (or, for HealthTrust Europe, an Order Form or other participation agreement) under which it participates in HealthTrust’s group purchasing program.
- **“Partners”** means the equity partners and the general partner of HealthTrust Purchasing Group, L.P.

Mission and Values Statement

HealthTrust is committed to strengthening provider performance and clinical excellence through an aligned membership model and the delivery of total spend management advisory solutions that leverage our operator experience, scale and innovation.

Our Vision

To become *the* total spend management company of choice for healthcare providers and market leaders.

Our Values

As we pursue our mission and vision, we are guided by these values:

- **Courage** – We will confront issues—having tough conversations, making bold choices, being willing to take reasonable risks and always doing the right thing.
- **Innovation** – Our curiosity and drive for excellence combined with our experience and creativity allows us to re-imagine solutions that lead to our client's success.
- **Accountability** – We will demonstrate discipline and a strong work ethic, which is evident through our pride and ownership of our work. We hold ourselves responsible as individuals, as teams, and as good stewards of HealthTrust. We keep our word.
- **Adaptability** – We embrace our changing environment and we maintain a culture that has a rich tradition of transforming itself to meet the challenges of the future.
- **Trust** – Trust is a foundational element to building a highly effective team. We as leaders will choose to trust and assume positive intent, and will take care of each other.

Purpose of Our Code of Conduct

Our Code of Conduct provides guidance to all HealthTrust colleagues in carrying out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with our members, clients, suppliers and one another. We act with absolute honesty, integrity and fairness in the way we conduct our business and lead our lives.

The Code applies to all individuals who work full- or part-time for HealthTrust, including employees and others who work for HealthTrust in the U.S. (directly or under a services agreement), HealthTrust Europe LLP in the U.K. or the Shanghai office of HealthTrust in the People's Republic of China (P.R. China). It also applies to our independent contractors, and any non-employee who serves as a member of the HealthTrust Partner Advisory Committee or any other HealthTrust advisory board. We refer to all of these individuals as HealthTrust colleagues in this Code.

The Code is a critical component of our overall Ethics and Compliance Program. We have developed the Code to help ensure that we meet our high ethical standards and comply with applicable laws and regulations. These standards are mandatory and must be followed.

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 requires additional guidance for those directly involved with the particular area to have sufficient direction. To provide additional guidance, we have developed a comprehensive set of policies and procedures that may be accessed on our intranet in the U.S., U.K. and our Shanghai office. Some of these policies and procedures may also be accessed on HealthTrust's external website in the U.S. at **HealthTrust Ethics and Compliance**, and in the U.K. at **HealthTrust Europe Ethics and Compliance**. These policies are not a part of this Code of Conduct, but they expand upon or supplement many of the principles articulated in this Code. These standards, like the Code, are mandatory and must be followed.

As a global company, we are sensitive to local customs and requirements, but we must always conduct ourselves in a way that is consistent with this Code. The Code is sometimes more restrictive than applicable laws and regulations, and you are required to abide by the Code even when it imposes requirements that go beyond legal obligations. The country in which you work has additional laws that apply to you. Also, under some circumstances, you may be subject to the laws of other countries in which HealthTrust operates even if you do not work in those countries. If you are uncertain of the applicable legal requirements, you should bring the matter to the attention of the HealthTrust Legal Department.

Leadership Responsibilities



While all HealthTrust colleagues are obligated to follow this Code, we expect our leaders to set the example. 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 are encouraged to propose ideas and raise concerns.

We also expect that all supervisors will ensure that their team members 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 HealthTrust that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns if they arise. We must never sacrifice ethical and lawful behavior in the pursuit of business objectives.

In addition, all leaders should be aware that HealthTrust supports and utilizes various training programs to help our supervisors develop and maintain excellent managerial skills. These tools

are coordinated by our Human Resources Business Partners. The foundational principles of these tools reflect the basic concepts of our Ethics and Compliance Program. The Ethics and Compliance Program, together with our leadership training efforts, encourages what we refer to as “principled leadership.” Such leadership assumes that those in our organization will lead by example, will confront problems directly and candidly, will be inclusive in identifying individuals to participate in the decision-making process, will give the maximum responsibility as appropriate to those who work with them and will emphasize effective team-building. In addition to these fundamental approaches to principled leadership, we expect those in our organization to understand and care about their colleagues. HealthTrust’s work is accomplished each day, for the most part, in small team settings. This encourages all leaders to strive to ensure that the talents of each member of the organization are utilized to the maximum extent possible and that we give careful attention to the professional development of everyone within HealthTrust.

Our Fundamental Commitment to Stakeholders

We affirm the following commitments to HealthTrust stakeholders:

TO OUR MEMBERS:

We are committed to strengthening provider performance and clinical excellence through an aligned membership model and the delivery of total spend management advisory solutions that leverage our operator experience, scale and innovation.

We are equally committed to honoring the unique culture of our member organizations by being familiar with their beliefs, charters and practices. We endeavor to exemplify each member's mission in our actions and to be viewed as an extension of the member's organization.

TO OUR HEALTHTRUST COLLEAGUES:

We are committed to a work environment where all colleagues are treated with fairness, dignity and respect, and where they have an opportunity to grow, develop professionally and work in a team environment in which all ideas are considered.

TO THE PARTNERS OF HEALTHTRUST:

We are committed to fully performing our responsibilities to manage HealthTrust in a manner consistent with the purpose of our partnership, our mission and values and all applicable legal requirements.

TO OUR SUPPLIERS:

We are committed to fair competition among our contracted and potential suppliers and to professional communication practices that will enhance our relationships with them. We strongly encourage our suppliers to adopt the AdvaMed Code of Ethics or a comparable code for their industry and comply with it in performing their obligations under our contracts.

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.

HealthTrust Self-Guidance Standards

As a HealthTrust colleague, you need to be aware of the following efforts to assure our stakeholders that we operate with unquestioned integrity:

- We have an Ethics and Compliance Program with a senior executive designated as our ethics and compliance officer, referred to herein as the HealthTrust ECO. We also have local ECOs at HealthTrust Europe in Birmingham, U.K., our representative office in Shanghai and our field offices in the U.S., referred to herein as the local ECOs.
- If a HealthTrust colleague in a decision-making role has a personal, financial or other private interest in any contracted or prospective HealthTrust supplier, the matter must be fully disclosed to HealthTrust and the colleague will be excluded from matters relating to the conflict in a way that effectively mitigates the conflict.
- HealthTrust does not as of this writing have an ownership interest in any prospective or contracted HealthTrust supplier. Such an interest could create an appearance of favoritism and lack of independence in managing contract decisions for the benefit of our members and clients. HealthTrust would consider obtaining such an interest only for reasons that benefit members and clients generally, such as a need to create or maintain a source of supply for products or services where there is no other source, or limited sources.
- HealthTrust does not invest in venture capital funds.
- HealthTrust does not invest in product research initiatives.
- HealthTrust does not have an ownership interest in Global Health Exchange (GHX), our contracted e-commerce company (although an affiliate of HealthTrust's general partner owns a small minority interest).
- We believe maintaining business relationships with minority-owned and women-owned business enterprises, and service-disabled veteran-owned small businesses is beneficial to our members and clients.
- Except for one legacy non-clinical contract, HealthTrust does not accept or contract for administrative fees from any supplier in excess of three percent, and always in strict compliance with the U.S. federal GPO Safe Harbor (42 U.S.C. Section 1320a-7b(b)).
- HealthTrust may receive a global sourcing fee from its members for products obtained through its Global Sourcing program. These fees range from zero percent to a maximum of five percent of the product price.





Relationships with Suppliers

HealthTrust manages its relationships with suppliers in a fair and objective manner that promotes competitive procurement consistent with applicable laws and good business practices. Our purchasing decisions are made based on the ability of the supplier to meet our members' and clients' needs and not on personal relationships or investments. Our criteria include quality, technical excellence, price, delivery, service and maintenance of adequate sources of supply. We employ the highest ethical standards in business practices, source selection, negotiation, determination of contract awards and the administration of all purchasing activities. HealthTrust's Business Relationship Statement, available on our external website, sets forth HealthTrust's expectations for the conduct of our suppliers in relation to HealthTrust and our members and clients.

Organizations that compete unsuccessfully through HealthTrust or for whatever reason elect not to compete through HealthTrust should respect the efforts of HealthTrust to maintain compliance with the agreements that we have awarded.

HGPII

HealthTrust participates in the Healthcare Group Purchasing Industry Initiative as a founding member. This is an umbrella group of the major healthcare group purchasing organizations in the U.S. and is intended to promote the highest standards of business conduct in group purchasing organization activities.

NEW TECHNOLOGIES

We encourage those with new technologies or product innovations to be certain that HealthTrust fully understands their capabilities and, in addition, we urge our advisory boards to bring new technologies to our attention. We have a policy that sets out a process for this important flow of information.



PARTICIPATION IN HEALTHTRUST EVENTS

HealthTrust regularly presents and sponsors educational activities and conferences for the benefit of its members and others. It may raise revenue for itself by offering exhibition booth space or sponsorship opportunities at such events to suppliers that have a national contract available to all HealthTrust members at the time of the event. All participating suppliers must be charged a like amount for like opportunities (except that reduced prices may be offered at HealthTrust's discretion pursuant to its Supplier Diversity Program). No supplier can be required to participate and its decision on whether to do so will have no impact on any contracting, contract renewal or other HealthTrust business decision. If, in connection with such an event, a supplier offers a meal or entertainment that is available only to HealthTrust colleagues, it is considered a business courtesy and subject to the limitations and reporting requirements as set forth in HealthTrust policies and procedures. A meal or entertainment at a HealthTrust event may not be offered by a supplier solely or primarily for a HealthTrust advisory board or its members, to avoid providing special access to HealthTrust decision-makers at HealthTrust events. Product samples that may be distributed by a supplier at such an event are not considered gifts subject to our business courtesies policy. All such samples received by HealthTrust must be used for product evaluation and documented per HealthTrust's product evaluation process and may not be taken for personal use.

If a physician (or other potential source of patient referrals to healthcare facilities of HealthTrust members) is participating in a HealthTrust event as a speaker, panelist or advisory board member or providing other support, a written agreement is required and other requirements as set forth in HealthTrust's policies and procedures must be met.

PARTICIPATION BY HEALTHTRUST COLLEAGUES IN EDUCATIONAL, TRAINING AND PROMOTIONAL EVENTS OF OTHERS

An educational, training or promotional event such as a conference or trade show presented and sponsored by a supplier or an industry or professional association may be attended by a HealthTrust employee only if HealthTrust pays all expenses for registration, meals, travel and lodging related to the event. The business and educational components of the event must predominate over all other activities taken together. Members of HealthTrust advisory boards must also adhere to these restrictions if they are attending the event at HealthTrust's request and expense. Limited exceptions to these restrictions are set forth in HealthTrust's policies and procedures, and include the following: free or reduced registration expenses and modest meals or entertainment may be accepted if part of the event agenda and available to all attendees. If a HealthTrust employee is speaking at an event session or is on an advisory board of the sponsoring organization, payment of customary expenses for his or her travel, lodging, meals and modest entertainment may be accepted from the sponsor. However, no honorarium or speaker's fee may be accepted by the employee. If a supplier offers a meal or entertainment event to HealthTrust colleagues but not to all attendees in connection with an event, it is considered a business courtesy and subject to the limitations and reporting requirements of HealthTrust's policies and procedures. If a supplier sponsors a function solely or primarily for an advisory board as a group, the advisory board members may attend if the function does not occur during the "quiet period" described in the **Business Courtesies** section of this Code.

PHYSICIAN-OWNED SUPPLIERS

Federal and state laws in the U.S., and U.K. laws, govern the relationship between physicians and/ or any contracted supplier that is owned in whole or in part by a physician and hospitals to which such physician may refer patients. The primary U.S. federal laws governing these arrangements are the Anti-kickback Law and the Stark Law. It is important that those colleagues who interact with physicians and/or physician-owned companies are aware of the legal requirements, which generally require that there be no transactions with a physician or physician-owned company for the purpose of generating referrals to any member or client healthcare facility.

HealthTrust will disclose to its members and clients any contracted suppliers that have physician ownership and are not publicly held corporations. The HealthTrust contract award status for such a supplier will not impose any requirement on a member or client to purchase under these contracts.



CHARITABLE ACTIVITIES

HealthTrust occasionally participates in charitable fundraising activities and we may provide opportunities for our suppliers to do so as well, with advance written approval by the CEO. Any such solicitations by HealthTrust to our contracted or prospective suppliers must be made in writing and include a statement that the supplier's decision on whether to participate will have no impact on any contracting or other business decision that may be made by HealthTrust, and that any funds the supplier may elect to contribute must be given directly to the charity rather than indirectly through HealthTrust.



Business and Financial Information

ACCURACY, RETENTION AND DISPOSAL OF DOCUMENTS AND RECORDS

Each HealthTrust 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 that accurate records are available to support our business practices and actions. No one may improperly alter, falsify or otherwise tamper with information in any record or document. Records must never be destroyed in an effort to deny governmental authorities access to records that may be relevant to a government investigation or inquiry.

Documents and records are retained in accordance with the law of the applicable jurisdiction and our records management policy, which includes comprehensive retention schedules. Documents include paper documents such as letters and memos, computer-based information such as email and electronic files and any other medium that contains information about the organization or its business activities. Records include information in any form that pertains to the Company's business and its legal obligations. It is important to retain and destroy records only in accordance with Company policy, which is oriented toward U.S. law. If laws in other jurisdictions are stricter than Company policy, such laws must be followed where applicable. No one may remove or destroy records prior to the date specified in the applicable record retention schedules, unless certain approvals have been obtained. Finally, under no circumstances may a HealthTrust colleague use another colleague's or any other individual's or entity's information to personally benefit themselves or otherwise in violation of law (e.g., insider trading or selling data).

CONFIDENTIAL INFORMATION

“Confidential Information” refers to non-public, proprietary information about our organization’s strategies and operations as well as third-party information and patient information. Improper use or disclosure of confidential information could violate legal and ethical obligations. HealthTrust colleagues may use confidential information only to perform their job responsibilities. They shall not share such information 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, or if the disclosure is confirmed by the HealthTrust Legal Department to be required by law.



“Sensitive Information” covers virtually anything related to HealthTrust’s operations that is not publicly known, such as personnel data maintained by the organization; pricing and cost data; any individually identifiable patient information, including patient financial information such as social security numbers; information pertaining to acquisitions, divestitures, affiliations and mergers; financial data; details regarding any federal, state or local tax examinations; proprietary information; strategic plans; marketing strategies and techniques; information of our members or clients; information of a contracted or prospective supplier, subcontractor or independent contractor; non-public information relating to a HealthTrust advisory board; and proprietary or licensed computer software. Sensitive data may also include photos and videos.

“Restricted Information” is considered highly sensitive data, including, Company passwords (not including one-time passwords), SecureID Pins, encryption keys, and cardholder data defined by the PCI standard, including cardholder name, expiration date, service code, and sensitive authentication data.

Use of due care and diligence is required to maintain the confidentiality, availability and integrity of information assets the Company owns or of which it is the custodian. Because so much of our business information is generated and contained within our computer systems, it is essential that each HealthTrust colleague protect our systems and the information contained in them. They must not share passwords and must review and adhere to our Information Protection & Security Policies and Standards.

Colleagues must protect such information when it is emailed outside the Company or otherwise stored, posted or sent through the Internet; stored on portable devices such as laptops, tablets and mobile phones; or transferred to removable media such as a USB drive. These policies and standards require, among other things, that the entity to which (or individual to whom) confidential information or restricted information is proposed to be sent be validated and that the information be encrypted. Colleagues must be extremely cautious with social media, taking care to not disclose sensitive information whether at work or at home and using either a Company or personal system.

Any HealthTrust colleague who knows or suspects confidential or sensitive information to have been compromised must report the potential security incident to HealthTrust's ECO, CEO, Chief Operating Officer, Chief Information Officer, Chief Legal Officer, or your local ECO.

When you started with HealthTrust, you signed the Confidentiality & Security Agreement, or CSA. In the CSA, you agreed to return any confidential and sensitive information and intellectual property to HealthTrust at the end of the employment or business relationship. If your employment or contractual relationship with HealthTrust or your service on a HealthTrust advisory board ends for any reason, you are still bound to maintain the confidentiality of information viewed, received or used during the employment or other business relationship with HealthTrust.

ELECTRONIC MEDIA

All communication systems, including but not limited to computers, email, intranet, Internet access, Company-provided telephones and voice mail, are the property of the organization and are to be used primarily for business purposes in accordance with our electronic communication policies and standards. Limited reasonable personal use of HealthTrust communication systems is permitted; however, colleagues 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 Company computers and telephonic systems and the Company reserves the right to monitor and/or access communication system usage and content consistent with our policies and procedures.

Colleagues may not use Company devices or Company-provided communication channels to access the Internet or social media to view, 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. Also, 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 communication systems or use them excessively for purposes other than Company business may lose these privileges and be subject to disciplinary action, including termination.

Colleagues shall comply with HealthTrust's information security policies and standards governing the use of information systems. Only assigned user IDs shall be used. Individuals are not permitted to share or disclose to any other person any password that is used by them to access Company systems or information. Portable devices and removable media, such as laptop computers, USB drives, and external hard drives, must have encryption enabled or be physically secured at all times. Colleagues shall never use tools or techniques to break or exploit HealthTrust information security measures or those used by other companies or individuals.



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 our partners, members, clients, contracted suppliers, employees and others. It is also necessary for compliance with tax and financial reporting requirements.

We maintain books and records of our activities consistent with applicable legal requirements, which in reasonable detail accurately and fairly reflect our transactions and dispositions of assets. We maintain a system of internal controls designed to provide reasonable assurance that all transactions are executed in accordance with management's authorization and are recorded in conformity with generally accepted accounting principles (GAAP).

We diligently seek to comply with all applicable auditing, accounting and financial disclosure laws, including but not limited to the U.S. Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002. Anyone having concerns regarding accounting or auditing matters should report such matters to the HealthTrust CEO, Chief Financial Officer, the HealthTrust ECO or your local ECO, or by calling the HealthTrust Ethics Line (1-800-345-7419).

PATIENT INFORMATION

"Protected health information" or "PHI" is health information that is specific to an individual patient. PHI is protected in the U.S. under the Health Insurance Portability and Accountability Act (HIPAA) and related laws, and in the U.K. under the Data Protection Act 2018. PHI is defined very broadly under HIPAA and includes information relating to the physical or mental health or condition of an individual, the provision of healthcare to an individual, or payment for the provision of healthcare to an individual.

All employees at HealthTrust that may possibly encounter PHI in their work must be trained to recognize PHI.



Most HealthTrust employees have no need to receive PHI to perform their job responsibilities. However, in some cases PHI may be included inadvertently in data sets provided to or accessed by an employee while performing services for a potential or existing member or client. If this occurs, the Privacy Officer, Information Security Officer, management and/or the Legal Department must be informed immediately to ensure proper procedures are followed, including notification to the member or client, and the return and/or destruction of the data in its entirety, or removal of PHI from it.

While infrequent, occasionally an employee must receive PHI in order to perform his or her job responsibilities. In such cases, the Privacy Officer, Information Security Officer, management and the Legal Department must be informed in advance to ensure that the employee will receive only the minimum amount of PHI necessary to do the job and only for a proper purpose under the law. The employee must also be trained on the proper processes for receipt, storage, distribution and destruction of such data. The Legal Department will further determine whether a business associate agreement is needed, to be put in place prior to access or receipt of PHI by such employees.

We realize the sensitive nature of this information and are committed to maintaining its confidentiality. If you have any concerns regarding this matter, please contact the Legal Department, your local ECO or Privacy Officer, or the HealthTrust ECO.



Business Courtesies

Business courtesies are things such as gifts, entertainment, food and beverages given or received by business contacts, to establish cordial relations and promote their respective companies. This section does not pertain to actions between HealthTrust and its colleagues, or among colleagues. Also, this section should not be considered in any way as an encouragement to provide, solicit or receive any type of entertainment, food and beverages, or gift. In some cases, attempts are made to disguise bribery through the giving or receiving of lavish business courtesies. This is prohibited. All business courtesies extended or received must be modest in value, reasonable and customary for the location and in compliance with applicable law. Value limitations are shown below for the U.S., U.K. and P. R. China. For other countries, see Company policies.

Under no circumstances may a HealthTrust colleague solicit a business courtesy.

Additional rules apply to the giving of a business courtesy to a “foreign official,” broadly defined under the U.S. Foreign Corrupt Practices Act and to the receipt of business courtesies within P.R. China or by P.R. China nationals anywhere in the world. See your local ECO or the HealthTrust ECO for more information.

Limitations on Value of Business Courtesies

LIMITATIONS ON GIFTS

Gifts may not exceed a total value per instance and per calendar year of \$75 in the U.S. or £25 in the U.K., for recipients from those countries. For gifts given or received in P.R. China or involving P.R. China nationals, the value may not exceed RMB 100 per instance or RMB 200 per calendar year. A gift may not be in the form of cash, cash equivalents, stock, checks, notes, warrants or other instruments. Gift cards are acceptable if not redeemable for cash and if the value of all such cards given or received by one individual from a particular company in one year does not exceed \$20 for recipients in the U.S. or £15 in the U.K. Gift cards may not be given or received where the laws of P.R. China apply or to “foreign officials” as defined under the U.S. Foreign Corrupt Practices Act, other governmental officials, or potential sources of referrals of patients to healthcare facilities of HealthTrust members. Gifts other than consumable gifts offered to HealthTrust (rather than an individual) may be accepted only with the written consent of the CEO.

PERISHABLE OR CONSUMABLE GIFTS

Perishable or consumable gifts given by a business contact to a HealthTrust department or group are discouraged. Although such gifts are not subject to specific limitations, they must be modest and reasonable in value and customary for the location. Similarly, if such a gift is given to a HealthTrust colleague who in turn makes it available in a public area of the office or facility for his or her department or group, it is not subject to any specific limitations if modest, reasonable and customary for the location.

LIMITATIONS ON EXPENDITURES FOR FOOD AND BEVERAGES, AND ENTERTAINMENT

No event that might be considered lavish or in questionable taste may be offered or accepted. Expenses for food and beverages may not exceed a total value per instance of the following amounts: \$150 for events in the U.S.; £250 for events in the U.K.; and RMB 250 for events that take place in P.R. China or that involve P.R. China nationals. The limitations set out in this paragraph do not apply to food and beverages served during a business meeting. As a general rule, a restaurant meal is usually considered to be a business courtesy and a meal served in an office is usually considered to be part of a business meeting. Expenses for entertainment such as a sporting or cultural event may not exceed a total value per instance of \$150 for events in the U.S.; £250 for events in the U.K.; and RMB 100 for events that take place in P.R. China or that involve P.R. China nationals.

LIMITATIONS ON EXPENDITURES FOR TRAVEL

Costs of transportation and lodging are similarly restricted. HealthTrust does not pay such costs for its business contacts and no offer from a business contact to pay such costs for a HealthTrust colleague may be accepted. Limited exceptions to this prohibition are outlined in our policies and include HealthTrust's payment of its members' expenses for the HealthTrust conference which is a benefit of membership; and instances where a HealthTrust colleague is acting as a speaker at a large industry or professional event or supplier event, or where he or she serves as a member of a governing or advisory body of a professional association. No colleague may speak on behalf of, or represent, any supplier.

OVERALL TOTAL EXPENDITURES PER YEAR

In addition to the limits referenced above, our policies specify the total expenditure amount per calendar year that HealthTrust may give to any business contact, or that a HealthTrust colleague may receive from a representative of any one company or company division is \$500 in the U.S., £500 in the U.K., and RMB 700 in China.

The total expenditure amount per calendar year that HealthTrust may give to any business contact, or that a HealthTrust colleague may receive from a representative of any one company or company division is \$500 in the U.S., £500 in the U.K., and RMB 700 in China.

Other Rules on Business Courtesies



EXTENDING BUSINESS COURTESIES TO GOVERNMENT EMPLOYEES, REPRESENTATIVES OR OFFICIALS

Special laws apply if an employee is considering extending a business courtesy to a person who is an official of, employed by or represents any government; an entity owned or controlled, in whole or in part, by a government; or a public international organization such as the World Health Organization.

For example, the governments of the U.S. and U.K. have strict laws regarding gifts, meals and other business courtesies for their employees. HealthTrust does not provide any gifts, entertainment, meals or anything else of value to any employee of the executive branch of the U.S. federal government or its fiscal intermediaries if they are acting in an oversight, investigative, enforcement or legal role. In other cases, meals valued at no more than \$20 per event, not to exceed \$50 per calendar year, may be offered, in addition to minor refreshments in connection with business discussions with employees of the U.S. federal government. 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. Please consult with your local ECO, the HealthTrust ECO or the HealthTrust Legal Department before the event takes place.

EXTENDING BUSINESS COURTESIES TO PHYSICIANS WHO ARE POTENTIAL REFERRAL SOURCES

The giving or offering of any meal, entertainment or gift by a HealthTrust colleague to physicians or others who are in a position to refer patients to a healthcare facility of a HealthTrust member or client must be undertaken in accordance with our policies as well as the policies of the member or client. Colleagues must consult our policies and the HealthTrust ECO prior to extending any business courtesy or token of appreciation to a potential referral source.

QUIET PERIOD

This quiet period relates to a supplier who has responded or intends to respond to a request for proposals issued by HealthTrust (or invitation to tender/ITT issued by HTE) in a particular product category. It begins with the issuance of the RFP or ITT and ends with the award or renewal of the contract. During that time, no business courtesy may be accepted from such a supplier by the advisory board as a group charged with evaluating that category, or any person on the HealthTrust negotiating team, except that HealthTrust or HTE employees may share a meal with such a supplier if the parties pay their own costs. At other times, regular business courtesies rules as set out above in this section apply.



Competitive Activities and Marketing Practices

We operate in a highly competitive environment. Our competitive activities must conform to the high standards of integrity and fairness reflected in this Code of Conduct. The Company requires compliance with antitrust, anti-monopoly and competition law and similar legislation governing competitive activities in the various jurisdictions in which we operate. Compliance with the Company’s written policies governing interactions with competitors, our members, clients and contracted and potential suppliers is also required.

GLOBAL ANTI-CORRUPTION AND BRIBERY

Bribery in connection with HealthTrust’s business is prohibited, whether direct, indirect or carried out by HealthTrust colleagues, intermediaries or other third parties. Payment of a bribe involves offering, promising or giving a financial or other advantage with the intent to induce or reward improper conduct. Offering, seeking or receiving bribes may be a criminal offense.

It is our policy to comply with all anti-corruption and bribery laws that apply to Company operations, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act 2010 (“Bribery Act”), similar laws in P.R. China and any other jurisdiction where HealthTrust conducts business. Our organization has a global anti-corruption policy that sets out rules for our business dealings with any person who is an official of, employed by or represents any government, an entity owned or controlled by a government or a public international organization such as the World Health Organization. That policy prohibits colleagues from giving, offering or authorizing the provision of anything of

value to, or for the benefit of, a government official to obtain or retain business, secure any other business advantage or to obtain beneficial governmental treatment, except as specifically permitted in the policy. Before offering or giving anything of value to an individual who may be an official, employee or representative of a government or state-owned or -controlled entity, colleagues must comply with all Company policies.



The Bribery Act has worldwide scope, applying to conduct within or outside the U.K. if an entity has a close connection with the U.K., as HealthTrust may have with its U.K. subsidiary HealthTrust Europe. The Bribery Act requires us to exercise care in our dealings with other persons in connection with HealthTrust's business. This includes but is not limited to employees, consultants, overseas agents, members, clients, suppliers and subsidiaries. The Bribery Act prohibits providing any financial or other benefit to individuals or businesses in public and private enterprise, as well as to foreign public officials, for the purpose of influencing the improper performance of an activity or function. It also includes the offense of failing to prevent bribery, so HealthTrust must ensure that it has adequate procedures in place to ensure prevention, one aspect of which is this Code of Conduct and its associated policies.

Similarly, in P.R. China, criminal law prohibits giving and receiving property in order to obtain an improper benefit, including an unfair commercial advantage. Under P.R. China law, bribery is typically divided into two categories - official bribery and commercial bribery. "Official bribery" involves bribes to a government agency, governmental officials or personnel performing public duties in state-owned enterprises or private companies. "Public duties" include the carrying out of organizational, leadership, supervisory and management functions on behalf of enterprises or institutions of any kind owned in whole or in part by the state. "Commercial bribery" means the offering or receiving of bribes between non-governmental agencies, companies or personnel.

Individuals as well as entities can be prosecuted for the crime of offering or accepting bribes. Chinese unfair competition law also prohibits commercial bribery, defined under that law as giving, receiving or demanding things of value in connection with the sale or purchase of goods or services. The granting of secret, off-record payments or kickbacks to any individual or company is considered to be a bribe.

Before offering anything of value to any person or entity that is doing business with or seeks to do business with HealthTrust, a HealthTrust colleague must follow the organization's policies on anti-corruption and business courtesies. Please contact the HealthTrust ECO, your local ECO or the HealthTrust Legal Department immediately if you have concerns about anti-corruption or bribery issues in any jurisdiction.

ANTITRUST AND UNFAIR COMPETITION

Antitrust, anti-monopoly and competition laws are designed to create a level playing field in the marketplace and promote fair competition. These laws could be violated by discussing HealthTrust business with a competitor (such as disclosing the terms of supplier relationships), allocating markets among competitors or agreeing with a competitor to refuse to deal with a supplier.

At trade association meetings or in other settings, colleagues must refuse to participate in discussions with competitors regarding prohibited subjects. Prohibited subjects include any aspect of pricing, key 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 that their objection be noted in an appropriate manner (e.g., meeting minutes) and, in any case, they must notify the HealthTrust Legal Department of the incident.

Because HealthTrust operates in several jurisdictions and the antitrust and competition laws can depend on local market conditions, it is not practical to adopt written policies to govern all situations. Colleagues should consult with their supervisors or the HealthTrust Legal Department for guidance concerning competitive activities, laws and policies related to their areas of responsibility.

GATHERING INFORMATION ABOUT SUPPLIERS OR COMPETITORS

Colleagues should avoid seeking or receiving confidential information about current or potential suppliers or competitors through improper means, if they know or have reason to believe the information is confidential. Confidential information can include information that is the property of the supplier or competitor such as prices charged; cost of goods, equipment, supplies or labor; terms of contracts; and other non-public information that the owner of the information seeks to keep confidential. As a HealthTrust member or client seeks best pricing, it may have or obtain information such as pricing from a supplier that does not have a HealthTrust contract and seek to share that information with HealthTrust. The HealthTrust member or client should not

disclose such information to HealthTrust and HealthTrust employees should not accept it, if the disclosure would be a violation of an agreement between the HealthTrust member or client and the non-contracted supplier.



MARKETING AND ADVERTISING

Consistent with laws and regulations that govern such activities, we use marketing and advertising activities to increase awareness of our services; provide information to our members, clients and potential members or clients and to our contracted and potential suppliers; educate the public; and recruit new colleagues. We strive to present only truthful, informative and non-deceptive information in these marketing and advertising materials and announcements.

While it is permissible to compare and contrast our services with those of our competitors, it is against Company policy to intentionally disparage other persons or businesses based on information that is untrue, or not known to be true, or to intentionally interfere with contractual and business relationships of another business through wrongful means. This does not prevent our competing for the business of those who may have a relationship with a HealthTrust competitor in a fair and non-deceptive manner.



Conflict of Interest

A conflict of interest may occur if a HealthTrust colleague's outside activities, second jobs, personal interests, financial interests or other private interests, or those of someone in his or her family, interfere or appear to interfere with the colleague's ability to make objective decisions in the course of his or her responsibilities to HealthTrust. A conflict may also arise if a colleague takes actions or has interests that may cause the colleague to compete with HealthTrust or misuse HealthTrust resources or confidential information, or if a colleague or family member receives anything that could be perceived as an improper benefit as a result of his or her position or affiliation with HealthTrust. Having a financial interest in a contracted or prospective HealthTrust supplier or a competitor of HealthTrust, or acting as a speaker or representative on behalf of such a company, is of special concern. HealthTrust colleagues are obligated to ensure they remain free of conflicts of interest, and even the appearance of conflicts, in the performance of their responsibilities at HealthTrust.

These restrictions also apply to our advisory board members. We have approximately ten advisory boards made up of representatives of our membership who have expertise in the product or service category over which the board has authority. These boards play a key role in our decision-making in awarding HealthTrust contracts.

While HealthTrust does not specifically prohibit employees from engaging in outside business activities, employees are expected to disclose, in writing, any outside employment, consulting, business activity or ownership in an external business.

We manage conflicts by requiring that they be disclosed so that they may be addressed. HealthTrust decision-makers must disclose conflicts as they arise to their supervisor,

advisory board lead, local ECO or the HealthTrust ECO, and they must annually certify as to their conflicts status. If a conflict arises, it is mitigated by taking action such as excluding the conflicted colleague from HealthTrust decision-making processes that relate to the conflict or requiring divestiture of the interest that gave rise to the conflict if applicable. If colleagues have any questions about whether an outside activity or private interest may constitute a conflict, they must discuss the matter with their supervisor, the HealthTrust ECO or their local ECO. If advisory board members have questions, they should consult with their advisory board lead.

We are also alert to the possibility of institutional conflicts, which could occur if HealthTrust itself or one of our equity partners has an interest in a supplier. Consideration for a HealthTrust contract award for such a supplier would follow the usual HealthTrust contracting process, with additional actions taken to mitigate the conflict. Representatives of the conflicted equity partner would be excluded from advisory board meetings where the supplier or product category will be discussed, or excluded from decision-making at such meetings.



Sustainability

HealthTrust supports the sustainability initiatives of our members by effectively incorporating the principles of environmentally preferable purchasing (EPP) into the contracting process. Environmentally preferable products are deemed less damaging to the environment and human health when compared to competing products. As part of our commitment to these initiatives, HealthTrust is launching a third-party data solution, providing members access to product-level data from responsible suppliers who offer products free of chemicals of concern and with packaging solutions that contribute to a facility's waste reduction goals.





Other Legal and Regulatory Matters

HealthTrust operates in three countries and many U.S. states. These operations are carried out pursuant to the federal, state and local laws and regulations of the various jurisdictions. We have developed policies and procedures to address many legal and regulatory requirements. Although it is impractical to develop policies and procedures that encompass the full body of applicable law, standards, conditions and regulations, all of these requirements must nevertheless be followed. There is a range of expertise within the organization, including in-house counsel and numerous functional experts, who should be consulted for advice concerning human resources, legal, regulatory, financial and other requirements.

Anyone aware of violations or suspected violations of laws, regulations or Company policies and procedures, or violations of this Code, must report them immediately to a supervisor or member of management, the HealthTrust Legal Department, your Human Resources Business Partner, your local ECO, the HealthTrust ECO or the Ethics Line.

AUDITS, SURVEYS, INSPECTIONS

From time to time, government agencies, accrediting bodies and other entities may conduct audits, surveys or inspections related to our facilities and operations. Any such audit, survey or inspection should be reported through your chain of command and to the local ECO or the HealthTrust ECO immediately. The scope of matters related to such an activity is extremely significant and broader than the scope of this Code of Conduct, but here are some general guidelines: In preparation for, during and after surveys, HealthTrust colleagues must deal with all government, accrediting and

external agency survey bodies in a direct, open and honest manner. No action should ever be taken that would mislead them; we respond with openness and accurate information. We do not conceal, destroy or alter any documents; lie or make misleading statements; or cause or attempt to cause another colleague to do so. Colleagues aware of violations or suspected violations of our obligation to provide truthful and factual representations and responses to auditing, survey or inspecting agencies must report the concern immediately through their chain of command and to their local ECO.



FRAUD

Fraud is the use of deception by someone intending to obtain an advantage, avoid an obligation, or cause a loss to another party. It includes offenses such as theft, embezzlement and misappropriation of assets. Examples include making a false claim for reimbursement of expenses or overtime pay not earned; requesting payment for services not rendered or goods not delivered; falsifying Company documents; and misappropriating funds, supplies, data or other assets. Fraud prevention at HealthTrust is everyone's responsibility. Supervisors should ensure they are familiar with the types of improprieties that could occur in their area and should establish internal controls. They should train their employees on identified risks and ensure that appropriate audits are performed. Employees must implement those controls and suggest additional ones, if warranted. All employees must report any suspected fraud to their supervisor, a member of management, the HealthTrust ECO, their local ECO or the Ethics Line.

GOVERNMENT RELATIONS AND POLITICAL ACTIVITIES

HealthTrust strives to comply with all laws governing participation in government relations and political activities in the jurisdictions where we operate. As a general policy, HealthTrust funds or resources are not contributed directly to individual political campaigns, political parties or other organizations that intend to use the funds primarily for political campaign objectives. HealthTrust resources include financial and non-financial assets such as work time, telephones, office space and email to solicit for a political cause or candidate.

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 that HealthTrust colleagues not give the impression they are speaking on behalf of or representing HealthTrust in these activities.

HealthTrust may engage in public policy debate only in those limited circumstances where it has special expertise that can inform the public policy formulation process. When HealthTrust may be directly impacted by a public policy decision, it may provide relevant, factual information about the impact of such decisions on organizations such as ours. 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. At times, HealthTrust may ask a colleague to make personal contact with government officials or to write a letter to present our position on specific issues. In addition, it may be part of the role of some HealthTrust supervisors to interface with government officials. If a colleague is making these communications or interacting on behalf of HealthTrust, he or she must be familiar with any regulatory constraints and observe them. Guidance should be sought from the HealthTrust Legal Department in such cases.

HIRING OF FORMER OR CURRENT GOVERNMENT EMPLOYEES

The recruitment and employment of former or current government employees may be impacted by conflict of interest regulations. Colleagues should consult with their Human Resources Business Partner prior to any such recruitment and hiring.

INELIGIBLE PERSONS

HealthTrust does not contract with or employ any individuals or entities that are currently excluded or ineligible to participate in U.S. federal healthcare programs; suspended or debarred from U.S. federal government contracts and has not been reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility; or currently on any U.S. state government exclusions list.

We search the U.S. General Service Administration's exclusion records in the System for Award Management, the U.S. Department of Health and Human Services' Office of the Inspector General and applicable state exclusion lists of such ineligible persons before entering into or renewing agreements with third parties, in accordance with Company policy. All such entities and individuals must represent to HealthTrust that they are not ineligible at the time of contracting, and they must agree to inform HealthTrust immediately of any change in status. If HealthTrust becomes aware of any supplier becoming ineligible during the term of its agreement with HealthTrust, we will terminate the agreement.

INSIDER INFORMATION AND SECURITIES TRADING

In the course of colleagues' employment or other business relationship with HealthTrust, they may become aware of non-public information about HealthTrust, a HealthTrust member, client or affiliate or a contracted or prospective supplier that could be material to an investor's decision to buy or sell such company's securities. Non-public, material information may include marketing strategy, financial results, plans for mergers or acquisitions, the awarding of a large contract or other business matters. Colleagues may not discuss this type of information with anyone outside of the organization. Within the organization, colleagues should discuss this information only on a "need to know" basis as required for the performance of job duties.

Colleagues may not buy, sell, transfer, gift or effect other transactions of publicly registered and traded securities of the company to which the information relates, or discuss that information with others, until the information is considered to be public. Information is considered public on the second trading day after the date of a general release of the information to the media.

INTERACTIONS WITH PHYSICIANS

U.S. federal and state laws govern the relationship between hospitals and physicians who may refer patients to facilities of our members or clients. The applicable federal laws include the Anti-kickback Law and the Stark Law.

All arrangements with physicians (such as speaking engagements, participation on an advisory board, employment or professional services agreements, supplier agreements, etc.) must be properly structured to ensure compliance with laws and company policy, and be diligently administered, to avoid violations of law. Most arrangements must be in writing and approved by the Legal Department. Failure to meet all requirements of these laws can result in serious consequences. 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 these relationships:

No payments for physician referrals to a member or client healthcare facility are allowed. Such healthcare facilities accept patient referrals and admissions based solely on

patients' medical needs and the facility's ability to render the needed services. They may not pay or offer to pay anyone — colleagues, physicians, or other persons or entities — directly or indirectly, for referral of patients.

No payments for a physician's referral to another facility are allowed. No healthcare facility or organization, or any person acting on its behalf, is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients. Similarly, when a member or client facility makes patient referrals to another healthcare provider, the member or client facility may not take into account the volume or value of referrals that healthcare provider has made (or may make) to that facility.





Intellectual Property Rights and Obligations

HealthTrust colleagues shall respect the valid intellectual property rights that others may have under patent, copyright, trade secret and other applicable laws. Unauthorized use of valid intellectual property rights of others is prohibited.

COPYRIGHT

HealthTrust colleagues may only copy and/or use copyrighted materials of others in accordance with a valid license, applicable law and with the owner's permission, if applicable.



RIGHTS TO DEVELOPMENTS

Any work of authorship, invention or other creation (Development) of a colleague within the scope of the colleague's employment with HealthTrust shall be considered the property of HealthTrust, including any patent, trademark, copyright, trade secret or other intellectual property right in the Development. Whether something is considered to have been developed during the scope of a colleague's employment depends on a number of factors, including:

- The nature of the colleague's work
- Whether the Development is related to HealthTrust's business
- Whether the colleague was directed to produce the Development as part of his or her work
- Whether the colleague utilized HealthTrust intellectual property or resources at least in part to make the Development, and/or
- Whether the colleague created the Development while being paid by HealthTrust

If any Development created is copyrightable or patentable, it will be considered a "Work for Hire" under the U.S. Copyright Act or U.S. Patent Act, a "Copyright Work" under the U.K. Copyright, Designs and Patents Act of 1988 or similarly designated by other applicable law, with HealthTrust being considered to be the author and owner of such work.

When creating Developments for HealthTrust, colleagues shall respect the intellectual property rights of others. Any works or inventions created by colleagues prior to employment by HealthTrust shall be disclosed to HealthTrust upon commencement of employment, and HealthTrust management and Legal Department approval shall be obtained prior to any use of these works or inventions in a Development for HealthTrust.

By signing the acknowledgment to this Code of Conduct by hand or electronically, a colleague specifically agrees to be bound by these provisions of the Code of Conduct. As such, the acknowledgment serves as an assignment by the named colleague to HealthTrust of all right, title and interest in all Developments created by the colleague within the scope of his or her employment, as well as an appointment of the chief legal officer of HealthTrust as the colleague's attorney-in-fact to execute documents on his or her behalf for the foregoing purposes. Colleagues shall assist HealthTrust in obtaining and enforcing intellectual property rights in their Developments, while employed by HealthTrust and after termination of employment.



Workplace Conduct and Employment Practices

HUMAN TRAFFICKING AND FORCED LABOR

HealthTrust is committed to a work environment that is free from human trafficking, forced labor and unlawful child labor. We expressly prohibit our contracted suppliers, subcontractors and manufacturers from engaging in human trafficking, forced labor, child labor or other exploitation of children. HealthTrust will not tolerate human trafficking and slavery in our business, or in the manufacture of products in our supply chain and will not accept products or services from suppliers who employ or use slavery, servitude, or forced labor in any manner.

DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY

HealthTrust actively promotes diversity in its workforce at all levels of the organization. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We are accountable to one another for the manner in which we treat each other and for the manner in which people around us are treated. We are committed to recruiting and retaining a diverse staff reflective of the communities we serve. We regard laws, regulations and policies relating to diversity as a minimum standard. We strive to create and maintain a setting in which we celebrate cultural and other differences and consider them strengths of the organization.

HealthTrust is an equal opportunity workforce and no one shall discriminate against any individual with regard to race, color, religion, sex, national origin, age, disability, sexual orientation, gender identity or expression, genetic information, veteran status or any other status that is protected under the laws of the applicable jurisdiction, with respect to any offer, term or condition of employment. We make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities.



HARASSMENT AND WORKPLACE VIOLENCE

Each HealthTrust 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 HealthTrust.

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and commercial crimes, stalking, violence directed at the employer or another employee, terrorism and hate crimes committed by current or former colleagues. Colleagues who observe or experience any form of work-related harassment or violence should report the incident to their supervisor, Human Resources Business Partner, another member of management, the HealthTrust ECO, your local ECO or the Ethics Line.

HEALTH AND SAFETY

All HealthTrust facilities comply with all applicable government regulations and rules, HealthTrust 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 supervisors whenever they have a question or concern. It is important that each colleague immediately advise his or her supervisor of any serious workplace injury or any situation presenting a risk of injury so timely corrective action may be taken to resolve the issue.

LICENSE AND CERTIFICATION RENEWALS

HealthTrust does not allow any colleague, independent contractor or privileged practitioner to work without a valid credential such as a current professional license, registration or accreditation, if one is required by their position description. Colleagues and independent contractors in such positions are responsible for maintaining the current status of their credentials. They shall comply at all times with legal and regulatory requirements applicable to their respective disciplines and jurisdictions. To assure compliance, HealthTrust may require evidence of the individual having a current license or credential status.

PERSONAL USE OF HEALTHTRUST RESOURCES

It is the responsibility of each HealthTrust 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 HealthTrust asset without prior supervisory approval is prohibited. The occasional use of items such as copying machines and telephones, where the cost to HealthTrust is insignificant, is permissible. Any community or charitable use of HealthTrust resources must be approved in advance by one's supervisor. Any use of organization resources for personal financial gain unrelated to the Company's business is prohibited.

RELATIONSHIPS AMONG HEALTHTRUST COLLEAGUES

In the normal day-to-day functions of an organization like HealthTrust, issues arise related to how people in the organization interact with one another. It is impossible to foresee all of these and many do not require explicit treatment in our Code of Conduct; however, a few routinely arise. 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 be inconsistent with Company policy. Another situation that routinely arises is a fundraising or similar effort undertaken by individual colleagues, in which no one should ever be compelled to participate. Similarly, when the Company 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 for such non-participation.



SUBSTANCE ABUSE AND MENTAL ACUITY

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 one's system or using, possessing or selling illegal drugs while on HealthTrust 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 that individuals may be taking prescription or over-the-counter drugs that could impair judgment or other skills required to perform their job. A colleague with questions about the effect of such medication on his or her own performance or who observes an individual who appears to be impaired in the performance of his or her job, must immediately consult with a supervisor.

USE OF SOCIAL MEDIA

Blogging and other forms of social networking include but are not limited to video or wiki postings, sites such as Facebook, Twitter, and YouTube, chat rooms, personal blogs or other similar forms of online journals and diaries or personal newsletters. HealthTrust follows the HCA Social Media Guidelines, found on Atlas. When posting comments or responses on HealthTrust's social networking sites, employees must identify themselves by providing name, position, title, and stating that they are employed by HealthTrust. Employees are personally accountable for their commentary on social media networks and can be disciplined when guidelines are violated. Violations of social media guidelines should be reported to the employee's supervisor, the HealthTrust ECO, or the Ethics Line at 800-345-7419.

PUBLIC SPEAKING

Unless specifically authorized, employees are restricted from responding to media interview requests or speaking on behalf of HealthTrust. Employees are expected to protect the privacy of patients, employees, members, suppliers and other stakeholders and are prohibited from disclosing patient information without proper authorization. Employees are also prohibited from disclosing proprietary or confidential information to which they have access and work with as a part of their job duties, without proper authorization. Any media interview requests should be directed to the AVP Marketing and Communications, for consideration. Marketing, senior management and HCA Communications will review and coordinate any responses.



The Company's Ethics and Compliance Program

PROGRAM STRUCTURE

The HealthTrust 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 (this Code and related 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 is the HealthTrust Ethics and Compliance Committee made up of HealthTrust senior management including the HealthTrust CEO, chief legal officer, the HealthTrust ECO, and the ethics and compliance officers of several of our partners.

The HealthTrust ECO is responsible for the day-to-day direction and implementation of the Ethics and Compliance Program. This includes developing resources (such as policies and procedures, training programs and communication tools) for and providing support (such as handling matters that come in through the Ethics Line, conducting program assessment and providing guidance) to colleagues, local ECOs and others.

The HealthTrust CEO is ultimately responsible for HealthTrust's ethics and compliance matters, as our "Responsible Executive." The CEO is called upon to direct the HealthTrust ECO in policy and training development efforts, conduct monitoring and auditing as appropriate and provide guidance.

Our local ECOs play a key role in ensuring the successful implementation of our Ethics and Compliance Program. They are responsible for distributing standards, ensuring training is conducted, monitoring, ensuring compliance with applicable laws, responding to inquiries and audits, investigating and resolving regional Ethics Line cases and otherwise administering the Ethics and Compliance Program in their respective regions.



Another important resource who may be able to address issues arising out of this Code of Conduct is your Human Resources Business Partner. Human Resources Business Partners 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, your Human Resources Business Partner may be the most appropriate person to contact. Because we promote the concept of management autonomy at our facilities, efforts should be made to resolve workplace conduct and employment practice issues through the individual's supervisor and the Human Resources Business Partner. Human Resources Business Partners also assist in investigating and resolving Ethics Line cases that relate to workplace conduct and employment practice issues.

All of these individuals or groups are prepared to support HealthTrust colleagues in meeting the standards set forth in this Code.

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 such as Compliance Alerts and advisory memoranda. It is the responsibility of each individual to be aware of the policies, procedures, handbooks and other materials that pertain to his or her work, and to follow the guidance they provide.

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. Additional training in certain areas of compliance risk may also be required of some individuals, as appropriate for their role at HealthTrust.

All ethics and compliance training is required to be recorded in the Company's learning management system (HealthStream) or other similar system. Through HealthStream, system administrators and ECOs track colleagues' compliance with their training requirements and report such information as necessary.

Many resources regarding our ethics and compliance program are available to HealthTrust colleagues on our intranet and to the general public on the Internet at HealthTrust Ethics and Compliance and, for HealthTrust Europe, at HealthTrust Europe Ethics and Compliance. We encourage all colleagues to frequently visit their home site.

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 the local level. It is an expected good practice, if one is comfortable and views it as 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 his or her local ECO, if applicable, or the HealthTrust ECO, Human Resources Business Partner, or another member of management at the facility or in the organization. Individuals are always free to contact the Ethics Line.

HealthTrust 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. However, any colleague who deliberately makes a false accusation for the purpose of harming or retaliating against another colleague may be 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, independent contractor, subcontractor, service provider or supplier that appears to violate applicable laws, rules, regulations, our policies or this Code.



If a matter that poses serious compliance risk to the organization is reported and the reporting individual doubts the issue has been given sufficient or appropriate attention, or remains unresolved, the individual should report the matter to higher levels of management or to 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 HealthTrust ECO coordinates any findings from regional or corporate-led investigations and 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) notifying the relevant government agency if any, instituting disciplinary action and implementing systemic changes to prevent a similar violation from recurring in the future.

DISCIPLINE

Any employee who violates the Code may 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 actions:

- Oral warning
- Written warning
- Written reprimand
- Suspension
- Termination
- Restitution

MEASURING PROGRAM EFFECTIVENESS

We are committed to assessing the effectiveness of our Ethics and Compliance Program through various efforts, including periodic audits conducted by the Internal Audit Department. The HealthTrust ECO routinely undertakes monitoring efforts in support of policies and compliance in general. The local ECOs conduct reviews of ethics and compliance programs designed to assess regional implementation of the Code, policies and procedures, Ethics Line and related investigations, and monitoring efforts.

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

ACKNOWLEDGMENT PROCESS

HealthTrust requires all employees, as a condition of employment, to acknowledge (by signature or electronic means) their review of the Code, confirm they understand that it represents mandatory policies of HealthTrust and agree to abide by it. New employees must receive Code of Conduct training within 30 days of employment. Each HealthTrust employee is also required to participate in annual Code of Conduct training. Advisory board members are required to participate in annual training on those aspects of this Code that are germane to their work as advisory board members. Records of such training must be retained by the ECO or local ECO who conducts or manages the training and copies of such records must be sent to and retained by the HealthTrust ECO.

Adherence to and support of HealthTrust'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.



Supplement for Those Who Sometimes Work in Healthcare Facilities

If your main place of work is within a healthcare facility, you should follow the Code of Conduct of your healthcare facility rather than this Code of Conduct.

If, in the performance of your job, you regularly visit one or more healthcare facilities and/or are temporarily stationed at or work from a healthcare facility, you must comply with the guidance below to the extent applicable to your work in a facility.

(If your job does not require you to visit or work temporarily in a healthcare facility, you do not need to review the below and can skip to the last section of this Code of Conduct.)

Patients

QUALITY OF CARE AND PATIENT SAFETY

Some HealthTrust colleagues are temporarily based at and/or visit the healthcare facilities of our members or clients where they may have contact with patients. We treat any patient we encounter with respect and dignity. As a general principle, our members and clients aspire to a standard of excellence for the entire team at each of their facilities and are committed to the delivery of safe, effective, efficient, compassionate and satisfying care and services. HealthTrust is part of that team. HealthTrust colleagues who encounter patients must be aware of our members' and

clients' commitment to patient rights and their privacy practices in conformity with all applicable state and federal laws, including but not limited to HIPAA in the U.S. and the Data Protection Act 2018 in the U.K.

This commitment to quality of care and patient safety is an obligation of all HealthTrust colleagues who encounter patients in their work. In any circumstance where a colleague questions whether quality or patient safety commitments are being fully met, that individual is obligated to raise this concern through appropriate channels. Such channels include the colleague's designated contact at the facility and, if necessary, beyond the facility, including notifying his or her supervisor, the HealthTrust ECO or the HealthTrust Ethics Line.

Workplace Conduct and Employment Practices in a Healthcare Facility



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 HealthTrust, our members, clients and patients. If a HealthTrust colleague becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from an organization, the incident must be reported immediately to his or her supervisor and the local ECO and, for a consultancy engagement, to the colleague's designated contact at the facility and others if required by company policy.



RESEARCH, INVESTIGATIONS AND CLINICAL TRIALS

If a HealthTrust colleague is involved in any research, investigation or clinical trial, he or she must ensure that all internal approvals have been obtained from his or her supervisor and others as required. We follow the highest ethical standards in full compliance with related federal and state laws. We do not tolerate research misconduct, which includes activities such as making up or changing results, copying results from other studies without performing the clinical investigation or research, failing to identify and deal appropriately with investigator or institutional conflicts of interest or proceeding without Institutional Review Board (IRB) approval. HealthTrust's first priority is always to protect patients and human subjects and respect their rights during research, investigations and clinical trials.

Any HealthTrust colleague conducting a clinical trial of investigational products or services is expected to fully inform all subjects of their rights and responsibilities of participating in the clinical trial. All potential subjects 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 subjects are fully informed of the procedures to be followed, especially any that are experimental in nature. Refusal of a potential subject to participate in a research study or the voluntary withdrawal of his or her participation in an existing study will not compromise his or her access to services or other benefits to which he or she is otherwise entitled. A subject's voluntary informed consent to participate in a clinical trial is documented and retained pursuant to Company policies.

Any HealthTrust colleague applying for or performing research of any type must follow all applicable research guidelines and privacy policies and maintain the highest standards of ethics and accuracy in any written or oral communications regarding the research project. As with all accounting and financial recordkeeping, our policy is to submit only true, accurate and complete costs related to research grants. Any HealthTrust colleague engaging in human subject research must do so in conjunction with IRB approval and consistent with Company policies regarding human subject research and IRBs.

To Obtain Further Guidance or Report a Suspected Violation of Our Code of Conduct or a Policy

- **Discuss the situation with your supervisor**
- **Discuss the situation with a member of management, your local ECO, the HealthTrust ECO, or**
- **Call the Ethics Line at the number below**

ETHICS AND COMPLIANCE OFFICERS' CONTACT INFORMATION

HealthTrust

Ethics and Compliance Officer

1100 Dr. Martin L. King, Jr. Blvd, Suite 1100
Nashville, Tennessee 37203
United States
Phone: +1 615-344-3000
Ethics@HealthTrustpg.com

HealthTrust Europe

Ethics and Compliance Officer

19 George Road Edgbaston
Birmingham B15 1NU
United Kingdom
Phone: +044 (0) 7791 511 538
HealthTrustEthics-Compliance@htepg.com

HealthTrust Purchasing Group LP Shanghai Representative

Office Ethics and Compliance Officer

Unit C, 30th Floor, 999 Pudong Road South
Shanghai, China 200210
Phone: +86 21 6058 1500
Ethics@HealthTrustpg.com

ETHICS LINE PHONE NUMBERS

- If calling from the **United States**, dial toll-free 1-800-345-7419.
- If calling from the **U.K.**, dial 0808 196 3805.
- If calling from the **People's Republic of China**:
 - For mobile users with international calling enabled:
 - Dial 001-800-345-7419 directly at full international carrier rates.
 - Individuals with China Mobile may dial 17951-001-800-345-7419 to receive discounted carrier rates.
 - Individuals with China Unicom may dial 10193-001-800-345-7419 to receive discounted carrier rates.
 - For mobile users without international calling enabled:
 - Dial 001-800-345-7419 directly from the HealthTrust Shanghai office

Acknowledgment Card

I certify that I have reviewed the HealthTrust Code of Conduct and understand that it represents mandatory policies of HealthTrust. I agree to abide by the Code.

SIGNATURE

PRINTED NAME (as listed in personnel records)

DEPARTMENT

LOCATION/FACILITY

³/₄ ID

DATE