



# Code of Conduct

# Mission statement and values

Above all else, we are committed to the care and improvement of human life.

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

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

## Dear HCA UK colleague,

At HCA UK we are guided by HCA's founding mission and values and are committed to creating and supporting a culture of doing the right thing.

Supported by HCA Healthcare, Inc. and led by our HCA UK Ethics and Compliance Officer, we have a comprehensive values-based ethics and compliance programme, which underpins and informs every aspect of how we conduct ourselves at HCA UK (also referred to in this document as the 'Company'). This supports our tradition of caring, for our patients, our communities, and each other.

We continually strive to deliver compassionate healthcare and to act with absolute integrity in the way we carry out our work and the way we live our lives.

This Code of Conduct (also referred to in this document as the 'Code'), reflects our tradition of caring and provides guidance to ensure our work is done in an ethical and legal manner. It guides our actions, and emphasises our shared common values and the culture which each of us helps to create.

The Code 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 our future.

If you have questions regarding this Code, or encounter any situation which you believe violates its provisions, you should immediately consult one or more of the following:

- your supervisor
- management at your facility
- your local Chief Human Resources Officer ("CHRO"),
- the HCA UK Ethics and Compliance Officer (Email: [ethicsandcompliance@hcahealthcare.co.uk](mailto:ethicsandcompliance@hcahealthcare.co.uk))

We are committed to ensuring our actions consistently reflect our words. In this spirit, it is our expectation that HCA UK is a community with shared values where all our actions reflect the high standards set out in this Code of Conduct.

Whatever your role, I ask you to help me and all our colleagues in supporting these values and principles that are critical to continuing our tradition of caring.

No Code of Conduct can act as a substitute for each person's own internal sense of fairness, honesty, and integrity. So if you encounter a situation, or are considering a course of action in your daily life and work that doesn't feel right, please discuss the situation with any of the people mentioned above. You have my personal assurance there will be no retribution for asking questions or raising concerns about the Code, or for reporting possible improper conduct.

Sincerely,



John Reay  
President and Chief Executive Officer,  
HCA Healthcare UK

# Contents

<b>Purpose of our Code of Conduct</b>	<b>6</b>	<b>Legal and regulatory compliance</b>	<b>16</b>	<b>Workplace conduct and employment practices</b>	<b>24</b>	<b>Environmental compliance</b>	<b>32</b>
<b>Leadership responsibilities</b>	<b>7</b>	Slavery and human trafficking	16	Conflict of interest	24	<b>Business courtesies</b>	<b>33</b>
<b>Our fundamental commitment to stakeholders</b>	<b>8</b>	<b>Accreditation and surveys</b>	<b>17</b>	Controlled substances	24	Receiving business courtesies	33
<b>Patients</b>	<b>11</b>	<b>Business and financial information</b>	<b>18</b>	Copyrights	24	Extending business courtesies to third parties	<b>34</b>
Quality of care and patients' safety	11	Accuracy, retention and disposal of documents and records	18	Diversity and equal employment opportunity	25	<b>Government relations and political activities</b>	<b>36</b>
Patients' rights	11	Coding and billing for services	18	Harassment and workplace violence	25	<b>HCA UK's Ethics and Compliance Programme</b>	<b>38</b>
Patient safeguarding	14	Confidential information	19	Health and safety	26	Programme structure	38
Patients' information	14	Electronic media	21	Insider information and securities trading	26	Setting standards	40
<b>Physicians</b>	<b>15</b>	Financial reporting and records	22	Licence and certification renewals	27	Training and communication	40
Interactions with physicians	15	Intellectual property rights and obligations	23	Personal use of HCA UK resources	27	Resources for guidance and reporting concerns	40
				Relationships among HCA UK colleagues	27	Personal obligation to report	41
				Relationships with subcontractors and suppliers	28	Internal investigations of reports	41
				Research, investigations and clinical trials	29	Corrective action	41
				Substance abuse	29	Discipline	41
				<b>Competitive activities and marketing practices</b>	<b>30</b>	Measuring programme effectiveness	42
				Antitrust and unfair competition	30	Acknowledgement process	42
				Marketing and advertising	31		
				Global anti-corruption	31		
				Bribery Act	31		



This Code of Conduct is effective from 12 November 2018.

Note: All references to 'HCA UK' or the 'organisation' or 'the Company' in this Code of Conduct refer to HCA UK Holdings Ltd, and/or its affiliates, as applicable.





## Purpose of our Code of Conduct

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

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

The Code is intended to be comprehensive and easily understood. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject 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 compliance policies and procedures which expand upon or supplement many of the principles discussed in this Code of Conduct.

Although we promote the concept of management autonomy at individual hospitals and our other facilities, the standards laid down in this Code are mandatory.

## Leadership responsibilities

While all HCA UK employees are obliged to follow our Code, we expect our leaders to lead by example, and to be in every respect a model of expected behaviour.

We expect everyone in the organisation with supervisory responsibility to exercise that responsibility in a manner that is kind, sensitive, thoughtful and respectful. We expect each supervisor, including our CEOs, to create an environment where all team members are encouraged to raise concerns and propose ideas.

We also expect that CEOs and senior managers 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 HCA UK which promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organisation to share concerns when they arise. We must never sacrifice ethical and lawful behaviour in the pursuit of business objectives.

Specific guidance for leaders throughout the organisation regarding their responsibilities under our Ethics and Compliance Programme is provided either in print or electronically. Leaders at all levels of the organisation should use that guidance to most effectively incorporate ethics and compliance into all aspects of our organisation.

**Any waiver or amendments to the Code of Ethics for Senior Financial Officers and CEOs must be approved by the Board of Directors.**

In addition, all leaders should be mindful that HCA UK supports and utilises various training mechanisms to ensure that our supervisors have excellent managerial skills. These training tools are coordinated by the Corporate Human Resources Department. The foundational principles in such tools reflect the basic concepts of our Ethics and Compliance Programme. The Ethics and Compliance Programme, together with our leadership training, encourages 'principled leadership'.

Such leadership assumes that those in our organisation:

- will lead by example
- will confront problems directly and candidly
- will be inclusive in taking decisions as to who should participate in the decision-making process
- will try to give the maximum responsibility to those who work with them
- will emphasise effective team-building.

In addition to these fundamental approaches to principled leadership, we expect those in our organisation to understand and care about their colleagues at work. Though HCA UK is a large organisation, its work is accomplished each day, for the most part, in small team settings. All leaders must ensure that the talents of each member of the organisation are utilised to the maximum extent possible and that careful attention is given to the professional development of all colleagues.

# Our fundamental commitment to stakeholders

We affirm these commitments to HCA UK stakeholders:

**To our patients:**

We are committed to providing quality care that is sensitive, compassionate, promptly delivered and cost-effective.

**To our HCA UK colleagues:**

We are committed to a work setting where all colleagues are treated with fairness, dignity and respect and which affords them an opportunity to grow, to develop professionally and to work in a team environment in which all ideas are welcomed.

**To our doctors and consultants:**

We are committed to providing a work environment which has excellent facilities, modern equipment and outstanding professional support.

**To our business partners:**

We are committed to dealing with our business partners in a way that demonstrates our commitment to contractual obligations, and reflects our shared concern for quality healthcare which is based on efficiency and cost-effectiveness. We want to do business with others who are ready to reflect our own ethical standards.

**To our regulators:**

We are committed to a corporate culture which promotes legal and regulatory compliance. We accept the responsibility to transparently self-govern and monitor adherence to the requirements of law and to our Code of Conduct.



**To our joint venture partners:**

We are committed to fully performing our responsibilities to manage our jointly owned facilities in a manner that reflects the mission and values of each of our organisations.

**To the communities we serve:**

We are committed to understanding the particular needs of the communities we serve and providing these communities quality, cost-effective healthcare. HCA UK recognises that we have a responsibility to help those in need and we support a range of charitable contributions and events in the communities we serve in an effort to promote goodwill and to further good causes.

**To our suppliers:**

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

**To our volunteers:**

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

**To our shareholders:**

We are committed to the highest standards of professional management which we intend will create unique efficiencies and innovative healthcare practice. This will help to ensure favourable returns on our shareholders' investments over the long term.





# Patients

## Quality of care and patients' safety

Our goal is to provide high quality, cost-effective healthcare to all of our patients. To that end, we are committed to the delivery of safe, effective, efficient, compassionate and satisfying care to patients. We treat all patients with warmth, respect and dignity and provide care that is both necessary and appropriate.

HCA UK has a comprehensive programme to promote the quality objectives of the organisation. In promoting a high quality of care, HCA UK facilities:

- focus on the attentiveness and dedication of service to patients;
- utilise evolving technology to promote quality of care and the safety of patients and an overall culture that makes the safety of patients paramount;
- have a comprehensive and effective approach to handling issues relating to the credentialing and privileging of members of the medical staff;
- undertake effective peer review mechanisms for their medical staff.

HCA UK aspires to a standard of excellence for all caregivers within its facilities. The entire facility team is committed to the delivery of safe, effective, efficient, compassionate and satisfying care and services.

This commitment to quality of care and safety of patients is an obligation of every HCA UK colleague. Accordingly, it is a fundamental principle of being part of HCA UK that each person dedicates himself or herself to achieving the goals described here. In addition, in any circumstance where an HCA UK colleague has a question about whether these standards relating to quality or the safety of patients are being fully met, that individual is obligated to raise this concern through appropriate channels until it is satisfactorily addressed and resolved. Such channels include those established at the facility and, if necessary, beyond – including the HCA UK Ethics Line.

HCA UK has a zero tolerance approach to any form of violence or abuse at our facilities. Any violence or abuse directed at staff or other patients by HCA UK staff, patients, relatives, contractors or members of the public is unacceptable and will not be tolerated. This includes the use of abusive language via social media platforms.

---

## Patients' rights

HCA UK complies with applicable UK legislation and does not discriminate on the basis of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation. We recognise and respect the diverse backgrounds and cultures of our patients and make every effort to equip our caregivers with the knowledge and resources to respect each patient's cultural needs.

Our facilities respect the patient's right to, and need for, effective communication. We strive to ensure that patients and/or their representatives have the information necessary to exercise their rights.

Each patient is provided with a written statement of patients' rights and a Privacy Notice is available on our website. This statement includes:

- the right of a patient to take decisions regarding medical care
- the right to refuse or accept treatment
- the right to informed decision making
- visitation rights of the patient or their support persons (including the patient's right to consent to receive visitors and the right to withdraw or deny visitor consent at any time)
- the patient's rights related to the maintenance of his or her health information.

Both documents conform to all applicable UK laws including, but not limited to, The General Data Protection Regulations 2016 (GDPR) and the Data Protection Act 2018.

We seek to involve patients in all aspects of their care, including giving consent for treatment and making healthcare decisions, which may include managing pain effectively, foregoing or withdrawing treatment and, as appropriate, care at the end of life. The hospital addresses the wishes of the patient relating to end-of-life decisions. As applicable, each patient or patient's representative is provided with a clear explanation of care including, but not limited to, diagnosis, treatment plan, the right to refuse or accept care, care decision dilemmas, advance

directive options, estimates of treatment costs, organ donation and procurement and an explanation of the risks, benefits and alternatives associated with treatment options. Patients have the right to request transfers to other facilities. In such cases, the patient is given an explanation of the benefits, risks and alternatives of the transfer.

Patients have the right to refuse care, treatment, and services in accordance with the law and regulations. Facilities are expected to take reasonable steps to determine the patient's wishes concerning designation of a representative to exercise the patient's rights. The explicit designation of a representative takes precedence over any non-designated relationship.

Patients are provided information regarding their right to make advance directives regarding



treatment decisions, financial considerations and the designation of surrogate healthcare decision-makers. Patient advance directives are honoured within the limits of the law and our organisation's mission, philosophy, values and capabilities.

In the promotion and protection of each patient's rights, each patient and his or her representatives are accorded appropriate confidentiality, privacy, security, advocacy and safeguarding services, opportunity for resolution of complaints and pastoral care or spiritual care. Patients have the right to an environment that preserves dignity and contributes to positive self-image.

HCA UK will not use personal data for marketing purposes without obtaining consent. We will not sell personal data to a third party. Patients are free at any time to change their mind and to withdraw consent regarding marketing purposes. This will not affect the healthcare services HCA UK offers to a patient.

Visitation plays an important role in the care of patients, and HCA UK facilities have written policies and procedures to ensure the visitor experience is a positive one for those in our care. If there are clinical reasons to limit or restrict visitation, our staff will explain those circumstances to the parties involved, and will also inform patients of their rights to consent to visitors or to limit contact while they are in our care. The wellbeing of the patient is at the centre of our care model, and the same standards are applied regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation.

Patients are treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights and involvement in their own care. HCA UK

facilities maintain processes to support patients' rights in a collaborative manner which involves the facility leaders and others. These structures are based on policies and procedures which make up the framework addressing both patients' care and organisational ethics issues. These structures include informing each patient or, when appropriate, the patient's representative, of the patient's rights in advance of furnishing or discontinuing care. The patient or patient's representative has the right to participate in the development and implementation of their plan of care. Patients receive information about the people who are responsible for their care, treatment and services. Patients (and, when appropriate, their families) are informed about the outcomes of care, treatment and services that have been provided, including unanticipated outcomes. Patients are also involved, as clinically appropriate, in resolving dilemmas about care decisions. The patient's rights include being able to request or refuse treatment. This is not, though, to be construed as a mechanism to demand treatment or services deemed medically unnecessary or inappropriate.

Facilities maintain processes for prompt resolution of patients' concerns in accordance with HCA UK policies and procedures.

HCA UK facilities maintain an ongoing, proactive safety effort for the identification of risk to patients' safety and the prevention, reporting and reduction of healthcare errors. HCA UK colleagues receive training about patients' rights in order to clearly understand their role in supporting them. Patients have the right to formulate advance directives and to have facility staff and practitioners comply with these directives.





## Patient safeguarding

HCA UK is committed to safeguarding our patients, their families and the communities we serve. Safeguarding is embedded within our corporate and clinical structures and policies to enable us to fulfil our statutory safeguarding responsibilities.

Health organisations and all staff working within them, play an important part in safeguarding by:

- promoting the welfare of children, young people and vulnerable adults
- identifying and responding to any indication of abuse and neglect
- contributing to multi-agency safeguarding arrangements.

HCA UK will support its employees to fulfil their safeguarding responsibilities by providing them with training relevant to their role, policies to guide them, and advice and support as part of our safeguarding escalation processes.

These requirements have been incorporated into our recruitment and disciplinary policies and procedures. In addition, guidance is provided on safeguarding during our employees' induction.

For full details of the safeguarding procedures at HCA UK, please refer to the Safeguarding Policies.

## Patients' information

We collect information about the patient's medical condition, history, medication and family illnesses in order to provide quality care. We recognise the sensitive nature of this information and are committed to maintaining its confidentiality. Consistent with data protection principles, we do not use, disclose or discuss patient-specific information, including patients' financial information, with others unless it is necessary to support the patient's care or permitted by law.

HCA UK colleagues must never use or disclose confidential information in a way that is inconsistent with the privacy and security policies and procedures, which reflect data protection requirements.

No HCA UK colleague, affiliated physician, or other healthcare partner has a right to any patient's information other than that which is necessary to perform his or her job.

**Subject only to emergency exceptions, patients can expect their privacy to be protected and patient-specific information will be released only to persons authorised by the patient or permitted by applicable laws.**

# Physicians

Healthcare facilities like those owned and operated by HCA UK reflect a collaboration between those who are part of HCA UK and those who have been granted practising privileges to practise in HCA UK facilities. As in any collaboration, each party has important roles and responsibilities. HCA UK is committed to providing a work environment for physicians, and other privileged practitioners who practise in our facilities, that is excellent in all respects.

We encourage members of our medical staff to be familiar with this Code of Conduct. There are many sections of this Code of Conduct that pertain to ethical or legal obligations of physicians in hospitals and this document is likely to be a helpful summary of those obligations for our medical staff members.

## Interactions with physicians

Applicable laws and regulations govern the relationship between hospitals and physicians who may refer patients to the facilities. It is important that those colleagues who interact with physicians, particularly regarding making payments to physicians for services rendered, providing space or services to physicians, recruiting physicians to the community and arranging for physicians to serve in leadership positions in facilities, are aware of the requirements of the laws, regulations and policies that address relationships between facilities and physicians.

Failure to administer the arrangements as agreed may result in violations of the law. Any arrangement with a physician must be structured to ensure compliance with legal requirements, our policies and procedures, and with any operational guidance that has been issued. Most arrangements must be in writing and approved by the HCA UK Legal Department. Failure to meet all requirements of applicable laws and regulations can result in serious consequences for a facility.

HCA UK agreements refer to the physician's duty to act in the patient's best interests at all times without reference to, or being influenced by, the fact of the agreement.

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

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

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



# Legal and regulatory compliance

HCA UK provides varied healthcare services in the UK. These services are provided pursuant to applicable UK laws and regulations and the conditions of participation for Government healthcare programmes. Such laws, regulations and conditions of participation may include, but are not limited to, subjects such as certificates of need, licences, permits, accreditation, access to treatment, consent to treatment, medical record-keeping, access to medical records and confidentiality, patients' rights, safeguarding patients, clinical research, end-of-life care decision-making, medical staff membership and clinical privileges, and corporate practice of medicine restrictions.

We have developed policies and procedures to address many legal, accreditation, certification and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law, standards, conditions and regulation. Obviously, those laws, standards, conditions and regulations not covered in organisation policies and procedures must be followed. There is a range of expertise within the organisation, including numerous functional experts and responsible executives, who should be consulted for advice concerning human resources, data protection, legal and regulatory standards, and conditions of participation requirements.

Anyone who becomes aware of violations or who suspects violations of such laws, regulations, standards and conditions of participation, or Company policies and procedures, must report this immediately to a supervisor or member of

management, the hospital Chief Executive, the Executive Director/VP Legal Services, the HCA UK Ethics and Compliance Officer, the Ethics Line, or the Chief Executive of HCA UK.

## Slavery and human trafficking

Human trafficking involves an act of recruiting, transporting or transferring, harbouring, receiving, transferring or exchanging control over a person through a use of force, coercion, abuse of vulnerability, fraud or deception or other means, for the purpose of exploiting them.

HCA UK is committed to a work environment that is free from human trafficking, forced labour and unlawful child labour. HCA UK is committed to promoting ethical and lawful employment and supply chain practices. These practices are also required to be followed by our suppliers, subcontractors or business partners worldwide.

HCA UK will not tolerate slavery, servitude, forced or compulsory labour in the manufacture of products we use or sell and will not accept products or services from suppliers who employ or utilise slavery, servitude, forced or compulsory labour in any manner.

In order to detail our responsibilities, HCA UK has in place a Human Trafficking Policy which sets out the obligations on staff, management and our supply chains to ensure that slavery and human trafficking does not occur.



# Accreditation and surveys

**From time-to-time, Government agencies and other entities conduct surveys in our facilities. We respond with openness and accurate information.**

The scope of matters related to accreditation or external agency survey is broader than the scope of this Code of Conduct.

In preparation for, or during, a survey or inspection, HCA UK colleagues must never conceal, destroy, or alter any documents, lie, or make misleading statements to the agency

representative. Colleagues must never attempt to cause another colleague to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records.

Anyone who is aware of – or suspects – violations of the requirement to give truthful and factual representations and responses to survey agencies must report these immediately to HCA UK's Ethics and Compliance Officer or another senior manager.

# Business and financial information

## Accuracy, retention and disposal of documents and records

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

Medical and business documents and records are retained in accordance with the law and our record retention policy, which includes comprehensive retention schedules. Medical and business documents include paper documents such as letters and memos, and computer-based information such as email or computer files on disk or tape and any other medium that contains information about the organisation or its business activities. It is important to retain and destroy records only according to our policy. HCA UK colleagues must not tamper with records. No one may remove or destroy records prior to the specified date without first obtaining permission as outlined in HCA UK's records management policies. Finally, under no circumstances may an HCA UK colleague use a patient's, colleague's or any other individual's or entity's information to personally benefit (e.g. insider trading or marketing of the data).

## Coding and billing for services

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

In support of accurate billing, medical records must provide reliable documentation of the services we render. It is important that all individuals who contribute to medical records provide accurate information and do not destroy any information considered part of the official medical record. Accurate and timely documentation also depends on the diligence and attention of physicians who treat patients in our facilities. We expect those physicians to provide us with complete and accurate information in a timely manner.

Any subcontractors engaged to perform billing or coding services are expected to have the necessary skills, quality control processes, systems and appropriate procedures to ensure all billings for Government and commercial insurance programmes are accurate and complete. HCA UK expects all such entities to have ethics and compliance programmes and Codes of Conduct. In addition, third-party billing entities, contractors and preferred vendors which are under contract consideration must be approved consistent with the relevant corporate policy.

## Confidential information

The term 'confidential information' refers to proprietary information about our organisation's strategies and operations, as well as patients' information and third-party information. Improper use or disclosure of confidential information could violate legal and ethical obligations. HCA UK colleagues may use confidential information only to perform their job responsibilities and must not share such information with others unless the individuals or entities have a legitimate need to know the information in order to perform their specific job duties to carry out a contractual business relationship. Such disclosure must not be prohibited by law or regulation.

Confidential information, also referred to as 'sensitive information,' covers virtually anything related to HCA UK's operations that is not publicly known, such as personnel data maintained by the organisation; patients' lists and clinical information (including individually identifiable information and clinical quality data); patients' financial information and NI numbers; passwords; pricing and cost data; information pertaining to acquisitions, divestitures, affiliations and mergers; financial data; details regarding Government and local tax examinations of the organisation or its joint venture partners; proprietary information from a research sponsor or the data generated from the research; strategic plans; marketing strategies and techniques; supplier and subcontractor information; and proprietary computer software. Sensitive data may also include photos and videos.





Due care and diligence is required at all times 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 clinical and business information is generated and contained within our computer systems, it is essential that each HCA UK colleague protects our computer systems and the information contained in them by not sharing

passwords and by reviewing and adhering to our information security policies and standards.

HCA UK colleagues must protect sensitive information when it is emailed outside the Company or otherwise stored, posted or distributed through the internet; stored on portable devices such as laptops, tablets and mobile phones; or transferred to removable

media such as CD or USB drive. These policies and standards require, among other things, that the individual and/or entity be validated and the information be encrypted. HCA UK colleagues must be extremely careful in the use of social media, taking care to not disclose patients' information or other sensitive information whether at work or at home and using company or personal systems.

Any HCA UK colleague who knows or suspects confidential information to have been compromised must report the potential security breach to HCA UK's Ethics and Compliance Officer. Where personal data is involved then the incident should also be reported to the HCA UK Data Protection Officer within the strict legal timelines.

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

---

## Electronic media

All communications systems, including but not limited to computers, electronic mail, intranet, internet access, Company-provided telephones and voicemail, are the property of the organisation and are to

be used primarily for business purposes in accordance with electronic communications policies and standards. Limited reasonable personal use of HCA UK communications systems is permitted, however, users should assume these communications are not private. Users of computer and facility telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer and telephonic systems and HCA UK reserves the right to monitor and/or access communications usage and content consistent with HCA UK policies and procedures.

Colleagues may not use HCA UK devices or Company-provided communication channels or access to the internet or social media to view, post, store, transmit, download, or distribute any threatening materials; knowingly, recklessly, or maliciously distribute false materials; obscene materials; or anything constituting or encouraging a criminal offence, giving rise to civil liability, or otherwise violating any laws. In addition, these channels of communication may not be used to send chain letters, personal broadcast messages, photos or videos, or copyrighted documents that are not authorised for reproduction.

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

Colleagues shall comply with HCA UK's information security policies and standards governing the use of information systems. Individuals may only use User IDs assigned to them individually and are not permitted to share or disclose any user account that is used to access HCA UK systems or information. Colleagues shall never use tools or techniques to break or exploit HCA UK information security measures or those used by other companies or individuals.

---



## Financial reporting and records

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

We are required to 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. HCA UK maintains a system of internal controls designed to provide reasonable assurance that all transactions are executed in accordance with management's authorisation and are recorded as necessary to permit preparation of financial statements in conformity with United Kingdom Generally Accepted Accounting Principles (UK GAAP) and have been prepared in accordance with the Companies Act 2006. Our financial statements are certified by our officers as giving a true and fair reflection of the company's affairs at the year end, in accordance with the Financial Reporting Standard applicable in the UK and Republic of Ireland. Financial information used for general business purposes, including estimates, projections, or general financial reports, must be sufficiently reliable and complete to fairly and reasonably serve the purpose for which the information is compiled and presented.

We diligently seek to comply with all applicable auditing, accounting and financial disclosure laws, including but not limited to the Securities Exchange Act of 1934 and the Sarbanes-Oxley Act of 2002.

Senior financial officers receive training and guidance regarding auditing, accounting and financial disclosure relevant to their job responsibilities.

Anyone having concerns regarding questionable accounting or auditing matters should report such matters promptly to HCA UK's Ethics and Compliance Officer or to the Legal Department, or freephone HCA UK Ethics Line **0808 169 8145**.



## Intellectual property rights and obligations

Any work of authorship, invention, or other creation ('Development') created by a colleague during the scope of the colleague's employment with HCA UK shall be considered the property of HCA UK, including any patent, trademark, copyright, trade secret or other intellectual property right in the Development.

**Whether something is 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 HCA UK's business;
- whether the colleague was directed to produce the Development as part of the colleague's work;

- whether the colleague utilised HCA UK intellectual property or resources at least in part to make the Development; and
- whether the colleague created the Development while being paid by HCA UK.

If any Development created is copyrightable or patentable, then it will be considered as 'Copyright Work' under the Copyright, Designs and Patents Act 1988, with HCA UK being considered the author and owner of such work.

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

# Workplace conduct and employment practices

## Conflict of interest

A conflict of interest may occur if an HCA UK colleague's outside activities, personal financial interests, or other personal interests influence or appear to influence his or her ability to make objective decisions in the course of the colleague's job responsibilities. A conflict of interest may also exist if the demands of any outside activities hinder or distract a colleague from the performance of his or her job or cause the individual to use HCA UK resources for other than HCA UK purposes. HCA UK colleagues are obligated to ensure they remain free of conflicts of interest in the performance of their responsibilities at HCA UK. If colleagues have any questions about whether an outside activity or personal interest might constitute a conflict of interest, they must obtain the written approval of their line manager before pursuing the activity or obtaining, divesting or retaining the interest.

Clinical decisions will be made without regard to compensation or financial risk to HCA UK leaders, managers, clinical staff, or licensed, independent practitioners.

## 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 organisations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorised individuals to minimise risks to us and to patients. If an individual becomes aware of inadequate security of drugs or controlled substances or the diversion of drugs from the organisation, the incident must be reported immediately. HCA UK facilities strictly enforce reporting of any violations of diverting medications by facility staff or privileged practitioners.

## Copyrights

HCA UK colleagues may only copy and/or use copyrighted materials pursuant to the organisation's policy on such matters.



## Diversity and equal employment opportunity

HCA UK actively promotes diversity in its workforce at all levels of the organisation. We are committed to providing an inclusive work environment where everyone is treated with fairness, dignity and respect. We will make ourselves accountable to one another for the manner in which we treat one another and for the manner in which people around us are treated. We are committed to recruit and retain a diverse staff reflective of the patients and 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 organisation.

HCA UK is committed to delivering the highest possible levels of fairness, equality and opportunity for all our colleagues. HCA UK is an equal opportunity workforce and no one shall discriminate against any individual with regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation with respect to any offer, or 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 HCA UK colleague has the right to work in an environment free of harassment and disruptive behaviour. 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.

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

Harassment also includes incidents of workplace violence. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism and hate crimes committed by current or former colleagues. Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Department, a member of management, HCA UK's Ethics and Compliance Officer; or call the freephone Ethics Line on **0808 169 8145**.

## Health and safety

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



## Insider information and securities trading

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

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

If an HCA UK colleague obtains access to non-public, material information about the organisation, or any other company while performing his or her job, the colleague may not use that information to buy, sell, transfer, gift or effect other transactions of publicly registered and traded securities of HCA UK or that other company. Even if he or she does not buy, sell, transfer, gift or effect other transactions of such securities based on what he or she knows, discussing the information with others, such as family members, friends, vendors, suppliers, and other outside acquaintances, is prohibited until the information is considered to be public. Information is considered to be public on the second trading day after the date of a general release of the information to the media. In

addition, HCA UK directors, officers and certain other designated HCA UK colleagues are subject to more detailed corporate securities trading policies, including certain pre-clearance procedures and blackout periods.

## Licence and certification renewals

Colleagues, individuals who act as independent contractors and privileged practitioners in positions which require professional licences, certifications, or other credentials, are responsible for maintaining the current status of their credentials and shall comply at all times with the law. To ensure compliance, HCA UK may require evidence of the individual's having a current licence or credential status and insurance coverage.

HCA UK does not allow any colleague, independent contractor or privileged practitioner to work without valid, current licences or credentials. Each colleague must have evidence of current and valid licences, certification, registration, accreditation or credential as required by their position description. Each facility must have appropriate processes and procedures to ensure documentation of compliance with these procedures.

## Personal use of HCA UK resources

It is the responsibility of each HCA UK colleague to preserve our organisation's assets including time, materials, supplies, equipment and information. Organisation assets are to be

maintained for business-related purposes. As a general rule, the personal use of any HCA UK asset without prior supervisory approval is prohibited. The occasional use of items, such as copying facilities or telephones, where the cost to HCA UK is insignificant, is permissible. Any community or charitable use of organisation resources must be approved in advance by an individual's supervisor. Any use of organisation resources for personal financial gain unrelated to the organisation's business is prohibited.

## Relationships among HCA UK colleagues

In the normal day-to-day functions of an organisation like HCA UK, there are issues that arise which relate to how people in the organisation deal with one another. It is impossible to foresee all of these and many do not require explicit treatment in our Code of Conduct. A few routinely arise, however. One involves gift giving among colleagues for certain occasions. While we wish to avoid any strict rules, no one should ever feel compelled to give a gift to anyone and any gifts offered or received should be appropriate to the circumstances and in accordance with HCA UK's policies. A lavish gift to anyone in a supervisory role would clearly violate organisation policy. Another situation, which 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 or a facility determines to support charitable organisations, no colleague should be compelled to contribute to the charitable organisation, nor should there be any workplace consequences of such non-participation.





## Relationships with subcontractors and suppliers

Those seeking to be suppliers to HCA UK should understand that virtually all of the system-wide procurement effort is executed, in effect, by the HealthTrust Purchasing Group (HPG). As in any large organisation, once central procurement decisions have been taken, it is anticipated that local facilities will utilise the negotiated contracts. Organisations that compete unsuccessfully through HPG for national agreements with HCA UK, or, for whatever reason, elect not to compete in such processes, should not be disappointed by efforts of those in the HCA UK supply chain to maintain compliance with negotiated national agreements. We encourage those with new technologies or product innovations to be certain that HPG fully understands their capabilities.

Copies of the Code and Statement are available on HPG's website at: [www.healthtrustpg.com](http://www.healthtrustpg.com)

We must manage our consulting, subcontractor and supplier relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote competitive procurement to the maximum extent practicable. Our selection of consultants, subcontractors, suppliers and vendors will be based on objective criteria including quality, technical excellence, price, delivery, adherence to schedules, service and maintenance of adequate sources of supply. Our purchasing decisions will be based on the supplier's ability to meet our needs and not on personal relationships and friendships. We employ the highest ethical standards in business practices in sourcing selection, negotiation, determination of contract awards and the administration of all purchasing activities. We comply with contractual obligations not to disclose vendor confidential information unless permitted under the contract or otherwise authorised by the vendor. (The subject of Business Courtesies, which might be offered by or to subcontractors or suppliers, is discussed on page 33.)

## Research, investigations and clinical trials

We follow the highest ethical standards in full compliance with applicable laws and regulations in research, investigations, and/or clinical trials conducted by our physicians and professional staff.

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; and proceeding without appropriate clinical and regulatory approval (if required). Our hospitals' first priority is always to protect the patients and human subjects and we respect their rights during research, investigations and clinical trials.

Physicians conducting clinical trials of products and services are expected to fully inform all subjects of their rights and responsibilities of participating in the clinical trial. All potential subjects invited to participate in a clinical trial 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 those 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 that individual's access to HCA UK services or other benefits to which he or she is otherwise entitled. A subject's voluntary informed consent to participate in a clinical trial will be documented and retained pursuant to Company and hospital policies.

Any HCA UK facility or 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 in all accounting and financial record-keeping, our policy is to submit only true, accurate and complete costs related to research grants. Any HCA UK facility or colleague engaging in human subject research must do so in conjunction with Institutional Review Board (IRB) approval and consistent with Company policies regarding human subject research and IRBs.

## Substance abuse

To protect the interests of our colleagues and patients, we are committed to an alcohol-free 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 your system; or using, possessing, or selling illegal drugs while on HCA UK work time or property may result in immediate termination of employment or contract. We may use drug testing as a means of enforcing this policy.

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

# 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 and other laws governing competitive activities and with the Company's written policies governing interactions with competitors, customers and suppliers.

## Antitrust and unfair competition

The Company has strict restrictions on communications with competitors, which are set out in Company policy. Generally, colleagues are not to discuss with competitors non-public 'competitively sensitive topics' as defined in the policy. Because antitrust laws are complex and their application can depend upon the conditions in local markets, it is not practical to adopt written policies to govern all situations. Colleagues should consult with their supervisors or the HCA UK Legal Department for guidance concerning competitive activities, laws and policies relating to their areas of responsibility.

## Marketing and advertising

Consistent with laws and regulations that may govern such activities, we may use marketing and advertising activities to educate the public; provide information to the community; increase awareness of our services; and to recruit colleagues.

We strive to present only truthful, informative and non-deceptive information in these materials and announcements.

While it is permissible to compare and contrast our services and prices, 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 another business's contractual and business relationships through wrongful means. This does not prevent fair, non-deceptive competition for business from those who may also have business relationships with a competitor.

## Global anti-corruption

It is our policy to comply with all anti-corruption laws that apply to Company operations, including the Foreign Corrupt Practices Act (FCPA) and the anti-corruption laws of nations in which HCA UK conducts business. The Company has a Global Anti-Corruption Policy that sets out policies and procedures for our business dealings with Foreign Officials, and prohibits colleagues from giving, offering or authorising the provision

of anything of value to, or for the benefit of, a Foreign Official, in order to obtain or retain business, to 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 any individual who may be an official, employee or representative of a Foreign Government, or of a state-owned or state-controlled entity, colleagues must comply with relevant Company policies.

## Bribery Act

The UK Bribery Act 2010 (The Bribery Act) requires us to exercise care in our dealings with anyone who performs services for the benefit of HCA UK. This includes, but is not limited to, employees, consultants, overseas agents, suppliers and subsidiaries. The Bribery Act prohibits providing any financial or other benefit to individuals or businesses in both public and private enterprise, as well as to foreign public officials for the purpose of influencing the improper performance of an activity or function. Under The Bribery Act, HCA UK is responsible for ensuring that it has adequate procedures in place to prevent bribery.

Before offering anything of value to a potential referral source, foreign public officials or any person or entity in business with HCA UK, an HCA UK colleague must follow HCA UK's policies on anti-corruption, entertainment and business courtesies. Further advice can be obtained from the HCA UK Legal Department or the HCA UK Ethics and Compliance Officer.





## Environmental compliance

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

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

## Business courtesies

This part of the Code of Conduct should not be considered as an encouragement to make, solicit, or receive any type of entertainment or gift. For clarity, please note that these limitations govern activities with those outside of HCA UK. This section does not pertain to actions between HCA UK and its colleagues or actions among HCA UK colleagues themselves. (See 'Relationships among HCA UK Colleagues' in this Code on page 27.)

All business courtesies, whether received by HCA UK staff or extended to third parties, must be logged in accordance with HCA UK's policies.

### Receiving business courtesies

We recognise there will be times when a current or potential business associate, including a potential referral source, may extend an invitation to attend a social event in order to further develop a business relationship. An HCA UK colleague may accept such invitations, provided: (1) the cost associated with such an event is reasonable and appropriate – consult the Business Courtesies Policy in relation to such cost limitations; (2) no expense is incurred for any travel costs (other than in a

vehicle owned privately or by the host entity) or overnight lodging; and (3) such events are infrequent. The limitations of this section do not apply to business meetings at which food (including meals) may be provided. Prior to accepting invitations to training and educational opportunities that include travel and overnight accommodations at reduced or no cost to a colleague or HCA UK, a colleague must consult our policies and obtain appropriate approvals.

HCA UK colleagues may accept gifts from an individual or organisation who has a business relationship with HCA UK (consult the Business Courtesies Policy in relation to gift value limitations). For the purposes of this paragraph, physicians practising in HCA UK facilities are considered to have such a relationship. Perishable or consumable gifts given to a department or group are not subject to any specific limitation. HCA UK colleagues may accept gift certificates, **but may never accept cash or financial instruments (e.g. cheques, stocks).**

Under no circumstances may an HCA UK colleague solicit a gift.

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



## Extending business courtesies to third parties

HCA UK colleagues must never offer a business courtesy with the intention of inducing or rewarding improper conduct (including improperly referring patients to HCA UK facilities). Business courtesies can only be offered for a bona fide purpose, such as to establish cordial relations or to legitimately market HCA UK's business. They must have a proper business justification, be reasonable in the circumstances and must not cause embarrassment if knowledge of the courtesy became public.

HCA UK places annual limits on the level of business courtesies that can be offered to third parties.

**Meals and entertainment.** There may be times when a colleague wishes to extend to a current or potential business associate an invitation to attend a social event (e.g. reception, meal, sporting event, or theatrical event) to develop a business relationship. The purpose of the entertainment must never be to induce any favourable business



action. During these events, topics of a business nature must be discussed and the host must be present. These events must not include expenses paid for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging. The cost associated with such an event must be reasonable and appropriate. Consult the Business Courtesies Policy in relation to such cost limitations. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than three times per year. The Business Courtesies Policy requires establishing the business necessity and appropriateness of the proposed entertainment before the event.

The organisation will under no circumstances sanction any business entertainment that might be considered lavish or in questionable taste. Departures from the limitations set out in the Business Courtesies Policy are rare and must be approved jointly by the Group Chief Finance Officer, the Executive Director/VP of Legal Services and the SVP and Chief Ethics and Compliance Officer (or designee) beforehand.

**Sponsoring business events.** HCA UK facilities may also routinely sponsor events with a legitimate business purpose (e.g. hospital Board meetings or retreats). Provided that such events are for business purposes, reasonable and appropriate meals and entertainment may be offered. However, prior approval must be obtained from the Group Chief Finance Officer and the Executive Director/VP of Legal Services or the Group Chief Executive Officer and the Executive Director/VP of Legal Services. In deciding whether such an event should be approved, the Group Chief Finance Officer and the Executive Director/VP of Legal Services or the Group Chief Executive Officer and the Executive Director/VP of Legal Services will take into account the purpose of the event and what benefits there are to HCA UK from hosting the event for the attendees.

**Gifts.** It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with HCA UK. We never use gifts or other incentives to improperly influence relationships or business outcomes. In order to avoid embarrassment, an effort should be made to ensure that any gift we extend meets the business conduct standards of the recipient's organisation too. Gifts to business associates who are not Government employees must not exceed the limitations set out in the Business Courtesies Policy. An HCA UK colleague or facility may give gift certificates, but must never give cash or financial instruments (e.g. cheques, stocks).

**Government employees.** The NHS is acknowledged to be a public body, and there are strict rules and laws regarding gifts, meals and other business courtesies for their employees. HCA UK recognises that it is likely that HCA UK colleagues will interact with Government employees and that business with Government employees or entities owned by foreign Governments are an important part of HCA UK's business in countries outside the United Kingdom. Interactions with individual Government employees pose a special risk under The Bribery Act and it is extremely important that HCA UK's dealings with Government employees are transparent and open. Any expenditure for meals, gifts, entertainment, travel or other things of value must be consistent with the Business Courtesies Policy.



# Government relations and political activities

**No donations, sponsorship or support to charities or political parties, causes or campaigns may be made on behalf of HCA UK unless in accordance with the requirements set out in the Anti-Bribery Policy.**

HCA UK complies with all applicable laws governing participation in Government relations and political activities. HCA UK funds or resources are not contributed directly to individual political campaigns, political parties, or other organisations which intend to use the funds primarily for political campaign objectives. There are no exceptions to this rule. Company resources include financial and non-financial donations such as using work time and telephones to solicit for a political cause or candidate, or the loaning of HCA UK property for use in the political campaign.

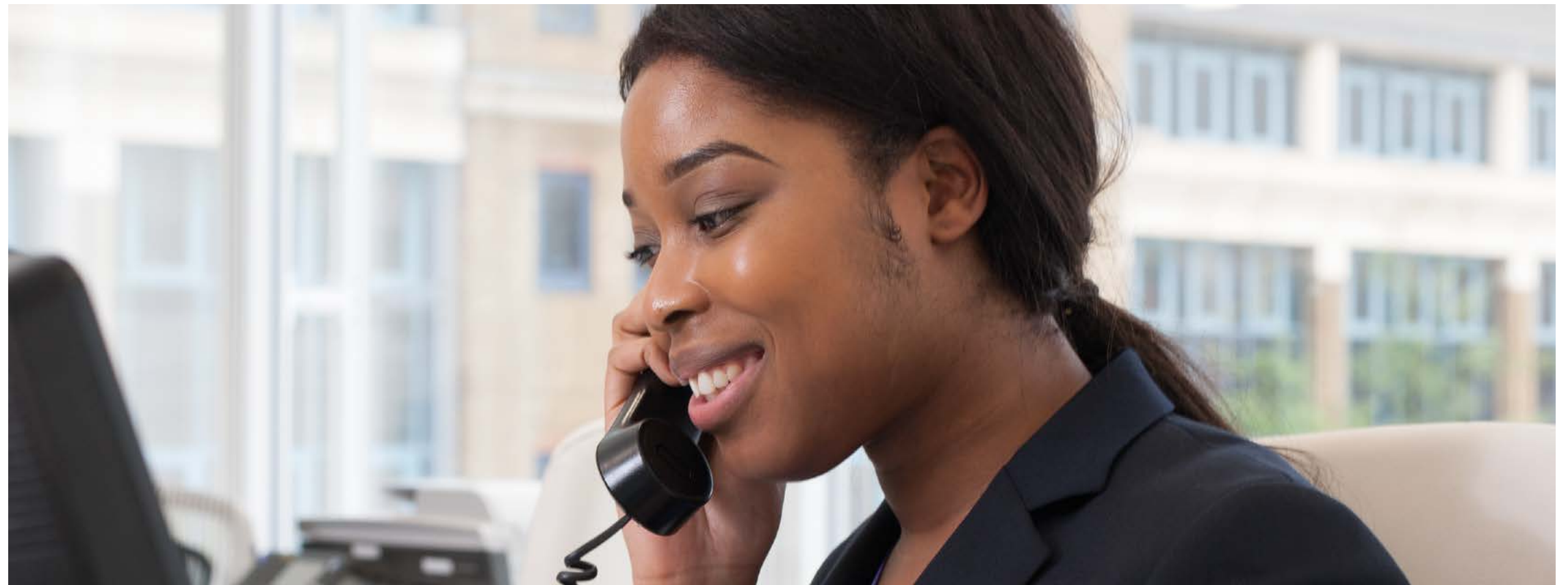
The Company engages in public policy debate only in a limited number of instances where it has special expertise that can inform the public policy formulation process. When the Company is directly impacted by public policy decisions, it may provide relevant, factual information about the impact of such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

It is important to separate personal and corporate political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence Government officials. No use of corporate resources, including email, is appropriate for personally engaging in political activity. A colleague may, of course, participate in the political process on his or her own time and at his or her own

expense. While doing so, it is important HCA UK colleagues do not give the impression they are speaking on behalf of, or representing, HCA UK in these activities. Colleagues cannot seek to be reimbursed by HCA UK for any personal contributions for such purposes.

At times, HCA UK may ask colleagues to make personal contact with Government officials or to write letters to present our position on specific

issues. In addition, it is a part of the role of some HCA UK management to interface on a regular basis with Government officials. If a colleague is making these communications on behalf of the Company, he or she must be certain to be familiar with any regulatory constraints and observe them. Guidance is available from the Corporate Affairs Team and HCA UK Legal Department as necessary.



# HCA UK's Ethics and Compliance Programme

## Programme structure

The Ethics and Compliance Programme is intended to demonstrate in the clearest possible terms the absolute commitment of the organisation to the highest standards of ethics and compliance. The elements of the programme include setting standards (the Code of Conduct and relevant policies and procedures), communicating the standards, providing a mechanism for reporting potential exceptions, monitoring and auditing, and maintaining an organisational structure that supports the furtherance of the programme. Each of these elements is detailed below.

These elements are supported at all levels of the organisation, including the following committees of HCA Inc. which provide direction, guidance and oversight: the Ethics and Compliance Committee of the Board of Directors; the Corporate Ethics and Compliance Steering Committee consisting of senior management; and the Corporate Ethics and Compliance Policy Committee consisting of senior management and representative facility CEOs.

HCA UK's Ethics and Compliance Officer is responsible for the day-to-day direction and implementation of the Ethics and Compliance Programme. This includes developing resources (including policies and procedures, training programmes and communication tools) and providing personal and professional support (including operating the Ethics Line, conducting programme assessment and providing advice).

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



Hospital CEOs serve as that facility's Ethics and Compliance Officer. They chair a Facility Ethics and Compliance Committee (FECC) to assist them in these efforts.

Chief Human Resources Officers 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, the Chief Human Resources Officer is the most appropriate person to contact. Because we promote the concept of management autonomy at local facilities, every effort should be made to resolve workplace conduct and employment

practice issues through the individual's supervisor and the Chief Human Resources Officer at the local facility. Experience has shown that this is an effective and productive way to deal promptly with these matters. Chief Human Resources Officers also assist in investigating and resolving Ethics Line cases and workplace conduct and employment practice issues.

All of these individuals or groups are prepared to support HCA UK colleagues in meeting the standards set out in this Code.

If you wish to discuss any aspect of HCA UK's Ethics and Compliance Programme, please email the HCA UK ECO at: [ethicsandcompliance@hcahealthcare.co.uk](mailto:ethicsandcompliance@hcahealthcare.co.uk)



## Setting standards

We set ethical and compliance standards through this Code of Conduct, policies and procedures, and occasionally through other guidance mechanisms. In addition, it is the responsibility of each individual to be aware of those policies and procedures that pertain to his or her work and to follow those policies and procedures.

**There is top level commitment to HCA UK's Ethics and Compliance Programme.**

---

## Training and communication

Comprehensive training and education has been developed to ensure that colleagues throughout the organisation are aware of the standards that apply to them. Code of Conduct training is conducted at the time an individual joins the organisation and is refreshed annually for all colleagues. Compliance training in areas of compliance risk is required of certain individuals. Company policies outline the training requirements.

All ethics and compliance training is required to be recorded. System administrators track colleagues' compliance with their training requirements and report such information as necessary.

Many resources regarding our programme are available to all HCA UK colleagues on our intranet and to the general public on the internet. We encourage all colleagues to visit both sites regularly.

---

## Resources for guidance and reporting concerns

To obtain guidance on an ethics or compliance issue or to report a concern, individuals may choose from several options. We encourage the resolution of issues, including human resources-related issues (e.g. payroll, fair treatment and disciplinary issues), at a local level. It is an expected good practice, when one is comfortable with it and believes it appropriate under the circumstances, to raise concerns first with an individual's supervisor. If this is uncomfortable or inappropriate, the individual may discuss the situation with the Facility Chief Human Resources Officer or another member of management at the facility or in the organisation.

**Individuals are always free to contact HCA UK's Ethics and Compliance Officer at [ethicsandcompliance@hcahealthcare.co.uk](mailto:ethicsandcompliance@hcahealthcare.co.uk) or to call the freephone HCA UK Ethics Line on 0808 169 8145.**

HCA UK has procedures and policy in place to comply with applicable UK legislation, including the Whistleblowing Policy which covers 'protected disclosures' under the Public Interest Disclosure Act 1998.

HCA UK makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct. There is no retribution or discipline for anyone who reports a concern in good faith.

**Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague is subject to discipline.**

---

## Personal obligation to report

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

---



## Internal investigations of reports

We are committed to investigating all reported concerns promptly and confidentially to the extent possible. HCA UK's Ethics and Compliance Officer coordinates any findings from corporate-led investigations and recommends corrective action or changes. 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 Company to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate Governmental agency, instituting whatever disciplinary action is necessary and implementing systemic changes to prevent a similar violation from recurring in the future.

---

## Discipline

All violators of this Code may be subject to disciplinary action.

**The precise discipline utilised will depend on the nature, severity and frequency of the violation and may result in any or all of the following disciplinary actions:**

- Verbal warning
  - First written warning
  - Final written warning
  - Dismissal.
-



## Measuring programme effectiveness

We are committed to assessing the effectiveness of our Ethics and Compliance Programme through various efforts. Much of this effort is provided by the Internal Audit Consulting Services Department, which routinely conducts internal audits of issues that have regulatory or compliance implications. Responsible Executives routinely undertake monitoring efforts in support of policies and compliance in general. Facilities conduct self-monitoring and the HCA UK Ethics and Compliance Officer conducts reviews of facility ethics and compliance programmes to identify and share best practices.

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

## Acknowledgement process

HCA UK requires all colleagues to acknowledge their review of the Code; to confirm they understand it represents mandatory policies of HCA UK; and to agree to abide by it. New colleagues are required to do so as a condition of employment. Each HCA UK colleague is also required to participate in annual Code of Conduct training and records of such training are retained by each facility.

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



To obtain further guidance on an ethics and compliance issue or to report a suspected violation of our Code of Conduct, please email the HCA UK Ethics and Compliance Officer at:

[ethicsandcompliance@hcahealthcare.co.uk](mailto:ethicsandcompliance@hcahealthcare.co.uk)

Please use the same email address to report any errors identified in this document, or for more information on how the ECO would welcome your support in your facility or hospital.

HCA Healthcare UK  
242 Marylebone Road  
London NW1 6JL

Connect with us



HCA UK Ethics Line:  
**Freephone 0808 169 8145**

## Our group

The Wellington Hospital  
The Princess Grace Hospital  
The Portland Hospital  
The Lister Hospital  
The Harley Street Clinic  
The Christie Private Care  
Sarah Cannon Research Institute (SCRI)  
Manchester Institute of Health & Performance (MIHP)  
London Bridge Hospital, Private care at Guy's  
London Bridge Hospital  
Leaders in Oncology Care  
Institute of Sports Exercise & Health (ISEH)  
HCA UK at University College Hospital  
HCA UK at the Wilmslow Hospital  
HCA Healthcare UK Laboratories  
GP Services

**020 7616 4848**

[www.hcahealthcare.co.uk](http://www.hcahealthcare.co.uk)

**HCA**Healthcare UK