

DEPARTMENT: Legal	POLICY DESCRIPTION: HCA Global Services India Anti-Corruption
PAGE: 1 of 5	REPLACES POLICY DATED:
EFFECTIVE DATE: April 1, 2024	REFERENCE NUMBER: LL.AC.001 India
APPROVED BY: Ethics and Compliance Policy Committee	

SCOPE:

This Policy applies to all persons who will act for or on behalf of HCA Global Services India (Company) in any capacity. This includes Directors, Employees, and all third parties who will represent the Company or otherwise act on the Company's behalf or are reasonably likely to have contact with a Government Official on the Company's behalf (Third-Party Representatives). Examples of Third-Party Representatives include agents, contractors, trustees, business partners, external consultants, or other persons who act on the Company's behalf outside the United States.

PURPOSE:

The Company is committed to conducting all aspects of its business activities with integrity, honesty, and in compliance with any applicable laws related to the prevention of bribery and corruption (Anti-Corruption Laws), including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act 2010, and the Indian Prevention of Corruption Act, 1988 (PCA), each as amended from time to time, other applicable national anti-bribery statutes and implementing rules and regulations. The Company prohibits giving bribes, kickbacks, gratification, undue advantage, and other corrupt payments of any kind to anyone, including any Government Official.

POLICY:

1. Policy Administration

The Company's Ethics and Compliance Officer (ECO) shall be responsible for implementation and oversight of this Policy and the Company's Ethics and Compliance Program.

2. Prohibited Conduct

Directors, Employees, and Third-Party Representatives are prohibited from corruptly offering, promising, authorizing, giving, or attempting to give, directly or indirectly through a third party, Anything of Value¹ to any person, including any Government Official or employee of a commercial customer or supplier, in order to:

- get or keep business,
- gain an improper business advantage,
- influence the recipient to act in favor of the Company or the third party,
- induce the recipient to perform his or her job functions in favor of the Company or the third party, or
- thank the recipient for improperly directing business or giving a business advantage to the Company or the third party.

Any offer or payment that would be improper if made by Directors, Employees, or Third-Party Representatives directly must not be made through others, especially when a Director, Employee, or Third-Party Representative knows or has reason to know that the payment will be given or offered for an improper purpose.

For the avoidance of doubt, any offer or payment of a Facilitation Payment is prohibited by this Policy. In addition, Directors, Employees, and Third-Party Representatives are prohibited

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from providing Business Courtesies to any Government Official without the prior written approval of the Senior Vice President and Chief Ethics and Compliance Officer, (as defined below) or designee.

3. **Third-Party Representatives**

The prior written approval of the Senior Vice President and Chief Ethics and Compliance Officer, or designee, is required before retaining a Third-Party Representative of any kind to transact business or interact with Government Officials, or otherwise represent the Company or act on the Company's behalf. The requisite due diligence required for the retention of such Third-Party Representatives may include, as appropriate, a review of the third party's reputation in the industry, prior dealings with the third party, a background due diligence report, a due diligence questionnaire, and/or other appropriate diligence in order to assess the risk of non-compliance.

To the extent the Senior Vice President and Chief Ethics and Compliance Officer, or designee, approves such retention, then such Third-Party Representative shall enter into a written agreement with the Company that includes the following requirements: (a) a provision wherein the subcontractor, agent or Third-Party Representative agrees to comply with applicable anti-corruption laws and this Policy and to certify compliance on an annual basis; (b) a term of no more than one year; and (c) no automatic renewal provision.

Approved contract provisions are included in Appendix A, and an approved certification of compliance is included in Appendix B.

4. **Hiring**

The following persons may not be offered any position or hired by the Company without prior written approval of the Senior Vice President and Chief Ethics and Compliance Officer, or designee: (a) Anyone who is a current or former Government Official (including Family Members); and (b) Anyone whom a Government Official requested the Company to hire.

5. **Charitable and Social Donations and Political Contributions**

No political contributions or charitable or social donations shall be given, offered, promised, or paid on behalf of the Company, except as authorized by the Senior Vice President and Chief Ethics and Compliance Officer, or designee.

6. **Effective Internal Controls and Accurate Books and Records**

The Company's policies require Employees and Third-Party Representatives to make and keep complete and accurate books, records, and accounts. Under no circumstances shall false, misleading, or artificial entries be made in the books and records of the Company, and no undisclosed or unrecorded funds or assets of the Company shall be established for any purpose.

7. **Reporting Obligations**

Employees must promptly report the violation or possible violation of this Policy or applicable laws to a supervisor, the Human Resources Department, the ECO, the Company's Board or a member of management of HCA Healthcare. Employees may also report any actual or

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potential ethical or legal compliance issue confidentially through use of a hotline and website administered by a third party on the Company's behalf. To report a concern via phone in India, please dial 000-117-800-455-1996. To report a concern via the web, go to <http://hcahealthcareethicsline.webline.sai360.net>.

All reports (telephone and web) may be submitted anonymously if permitted by applicable local law.

The Company prohibits retaliation against Employees who, in good faith, either make reports or participate in the investigation of a report of suspected misconduct. Ethics and Compliance Non-Retaliation Policy EC.030.

8. Training and Certification

Directors and Employees shall receive annual anti-corruption training. Documentation regarding this training must be kept by the ECO.

All Third-Party Representatives must receive Company-approved anti-corruption training at least annually. Documentation regarding this training must be kept by the ECO.

In addition, subject to local law, Directors and Employees will be required to complete and sign, on an annual basis, the certification of compliance with this Policy and applicable law found at Appendix C.

9. Consequences for Violations

Any Employee who violates this Policy, including failing to report a violation or possible violation of this Policy by others, may be subject to disciplinary action. This action may include, among other sanctions, a reprimand, warning, probation, financial penalties, suspension without pay, or termination.

DEFINITIONS:

Anything of Value broadly includes any financial or other advantage or gratification of any form other than legal remuneration, including but not limited to cash, gifts, stock, tickets to sporting events, referrals, employment, business opportunities, meals, travel, favors, gratification, loans, confidential non-proprietary information, charitable contributions, medical or living expenses, promises of future employment, free use of a vacation home, and discounts and rebates.

Business Courtesies are any item of value given to another free of cost. This includes gifts and events sponsored or hosted by the Company that include some discussion of the Company's business. Examples of Business Courtesies include holiday gifts, meals, sporting events, theatrical events, receptions, or other entertainment or social events.

Director means member of the Company's Board of Directors.

Employee means management (including officers) and members of staff employed (whether permanent, fixed term or temporary) by the Company at all levels and grades, including but not limited to temporary staff, volunteers, interns, apprentices, trainees, casual workers, agents, seconded staff, and consultants.

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Facilitation Payment means a payment of minor value made in order to acquire or accelerate performance of a non-discretionary task, usually performed by a Government Official, to which the Company is entitled. Such payments may violate applicable anti-corruption laws.

Government Official means any (1) elected and unelected officials, employees, agents, advisors and representatives of any branch or agency of government or remunerated by the government (i.e., local, regional, and national, and legislative, administrative, judicial, and executive branches); (2) directors, officers, employees, representatives and agents of government-owned or controlled companies, even if the companies are only partially owned or controlled by the government and the company acts like a commercial entity; (3) any person in the service or pay of the Government or remunerated by the Government by fees or commission for the performance of any public duty; (4) any person in the service or pay of a local authority; (5) any person in the service or pay of a corporation established by or under a Central, Provincial or State Act, or an authority or a body owned or controlled or aided by the Government or a Government company; (6) any Judge, including any person empowered by law to discharge, whether by himself/herself or as a member of any body of persons, any adjudicatory functions; (7) any person authorized by a court of justice to perform any duty, in connection with the administration of justice, including a liquidator, receiver or commission appointed by such court; (8) any arbitrator or other person to whom any cause or matter has been referred for decision or report by a court of justice or by a competent public authority; (9) any person who holds an office by virtue of which he/she is empowered to prepare, publish, maintain or revise an electoral roll or to conduct an election or part of an election; (10) any person who holds an office by virtue of which he is authorized or required to perform any public duty; (11) any person who is the president, secretary or other office-bearer of a registered co-operative society engaged in agriculture, industry, trade or banking, receiving or having received any financial aid from the Central Government or a State Government or from any corporation established by or under a Central, Provincial or State Act, or any authority or body owned or controlled or aided by the Government or a Government company; (12) any person who is a chairman, member or employee of any Service Commission or Board, by whatever name called, or a member of any selection committee appointed by such Commission or Board for the conduct of any examination or making any selection on behalf of such Commission or Board; (13) any person who is a Vice-Chancellor or member of any governing body, professor, reader, lecturer or any other teacher or employee, by whatever designation called, of any University and any person whose services have been availed of by a University or any other public authority in connection with holding or conducting examinations; (14) any person who is an office-bearer or an employee of an educational, scientific, social, cultural or other institution, in whatever manner established, receiving or having received any financial assistance from the Central Government or any State Government, or local or other public authority; (15) political parties, party officials and candidates for office; (16) officers, employees, representatives and agents of public international organizations, such as the United Nations, the World Bank, the International Monetary Fund, the Red Cross or the World Trade.

HCA Healthcare, the U.S.-based “parent” corporation of the Company.

Senior Vice President and Chief Ethics and Compliance Officer refers to the Senior Vice President and Chief Ethics and Compliance Officer of HCA Healthcare.

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REFERENCES:

1. The Uniform Code for Pharmaceutical Marketing Practices
2. The Indian Medical Council (Professional conduct, Etiquette and Ethics) Regulations, 2002
3. Draft Uniform Code for Medical Device Marketing Practice may also be applicable if an Employee of the Company interacts with a healthcare professional on behalf of the Company
4. Indian Prevention of Corruption Act, 1988 (PCA)
5. U.K. Bribery Act 2010
6. U.S. Foreign Corrupt Practices Act (FCPA)