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INTRODUCTION

FOREWORD BY MICHAEL NEEB, CHIEF EXECUTIVE OFFICER

Dear Colleagues

In the healthcare industry, as in perhaps no other, trust and integrity are at the cornerstone of what we do. HCA International Limited ("HCA" or "the Company") is committed to maintaining the highest standards of ethical business conduct. We take a zero tolerance approach towards dishonesty, bribery and any other breaches of the law. To this end, HCA has developed, and HCA senior management team has approved this Anti-Bribery Policy ("this Policy").

This Policy exemplifies our key principles of integrity, professionalism and responsibility. This Policy is not the only document in which HCA's commitment to doing business in an ethical way is reinforced. It is accompanied by more detailed policies and procedures set out in Appendix I. The Company also has numerous policies concerning particular aspects of our business, many of which contain safeguards to reduce the risk of bribery.

This Policy fits within HCA's overall "*Code of Conduct*", which provides guidance to all employees and helps them carry out their work within appropriate ethical and legal standards. This Policy also reflects the key principles of HCA Holdings Inc's Global Anti-Corruption Policy, which has worldwide application and applies to the Company as part of HCA Holdings Inc.

This Policy takes into account the provisions of the Bribery Act 2010, and the UK Government's guidance on procedures relevant to commercial organisations, which supplements the Act. It is based on an assessment of the key areas in which bribery may pose risks to our business.

The HCA senior management team is committed to leading by example, working together with our business colleagues to maintain the highest standards in our business dealings. We are keen to promote an 'open door' approach where anyone who wishes to can raise and discuss any issues.

Our mission is to provide high quality, cost-effective healthcare in the communities we serve. Abiding by the law and acting with integrity are essential to the success of our business and are the right thing to do.

If you would like to ask any questions about this Policy, voice concerns or clarify any areas of uncertainty, please contact your Ethics Officer.

Thank you for playing your part in ensuring that HCA International continues to maintain the highest ethical standards.

Yours sincerely,

Michael Neeb

President and Chief Executive Officer, HCA International Limited

13 April 2012

ABOUT THIS POLICY

2.1 This Policy sets out the business practices and principles of behaviour that are required of you as a HCA International Colleague ("Colleague" includes Employees and Intermediaries). All Colleagues, wherever located, must abide by this Policy. This Policy applies specifically to HCA International but runs alongside the Global Anti-Corruption Policy, which also applies to HCA International Colleagues due to its worldwide application. A copy of the Global Anti-Corruption Policy can be found on Grapevine.

2.2 Key Principles

2.2.1 The HCA International Policy is founded on three key principles.

2.2.1.1 Integrity

We strive to be a company of law-abiding, honest people who do what is both commercially and ethically right for our business and patients.

2.2.1.2 Professionalism

We employ high quality people who deliver a standard of excellence in everything we do.

2.2.1.3 Responsibility

We take personal pride in our work and responsibility for our actions.

2.3 This Policy represents a framework to help guide decision making within the Company. It is not, and cannot be, a manual which answers every question or deals with every scenario.

2.4 You are expected to read this Policy in full. If you are subject to disciplinary proceedings involving a breach of this Policy, it will not be a valid excuse to say that you have not read and understood the full Policy.

2.5 Ethical business conduct is a dynamic subject, and this Policy will be reviewed to ensure that the Company's standards are aligned with the current thinking on best practice in business ethics and reputation risk management.

2.6 Who this Policy Applies To

2.6.1 Employees (which includes officers, directors, management and those with a contract of employment or service agreement with HCA International Limited) at all Facilities.

2.6.2 Intermediaries, including:

2.6.2.1 Agents;

2.6.2.2 Joint venture partners;

2.6.2.3 Business representatives;

2.6.2.4 Doctors and their staff contracted to HCA (for example under a fully – managed practice agreement);

2.6.2.5 Doctors and their staff practising in HCA premises (for example pursuant to a consulting room licensing agreement).

Employees and Intermediaries are referred to collectively as "Colleagues".

2.7 Who to Contact

2.7.1 For further information regarding this Policy, or how to report your ethical concerns, refer to the following:

2.7.1.1 The HCA Code of Conduct;

2.7.1.2 Grapevine;

2.7.1.3 Your Facility CHRO;

2.7.1.4 The Ethics Officer;

2.7.1.5 The HCA Ethics Line;

BRIBERY PROHIBITED

3.1 Bribery in connection with HCA's business is prohibited, whether direct or indirect, and whether carried out by Employees or Intermediaries or other third parties. Payment of a bribe involves offering promising or giving a financial or other advantage (for example money, goods, services or information) with the intention to induce or reward improper conduct. The offer or provision of a bribe is a criminal offence. An example of bribery would be offering a job to the relative of a state official in order to persuade the official to recommend doing business with the

Company. Another example would be offering money or lavish hospitality to a doctor in exchange for a promise to refer patients for un-necessary tests at a company facility.

- 3.2 It is also criminal to seek or receive bribes and it is contrary to this Policy to do so.
- 3.3 The Company also prohibits the making of so-called Facilitation Payments. A Facilitation Payment is a small payment which is made in order to acquire or accelerate performance of a non-discretionary task, usually performed by a state official, to which the business is properly entitled. Though tolerated in some countries, such payments are unlawful under UK law.
- 3.4 If you suspect a situation may involve bribery then that suspicion should be acted upon. HCA will obtain appropriate legal advice as necessary. HCA does not wish or expect a Colleague to make a legal judgment as to whether the situation does or does not involve bribery - if in doubt you should report your concerns to the appropriate person, as indicated in paragraph 2.7.

EXTERNAL RELATIONSHIPS

- 4.1 Business Courtesies
 - 4.1.1 Business entertainment and gifts can create goodwill and build sound working relationships.
 - 4.1.2 The Company does not prohibit bona fide gifts or hospitality which seek to improve the image of the Company, to better present the Company's products and services or to establish cordial relations. However, there should be a genuine business purpose for any business courtesy. Offering gifts or hospitality which is intended to secure an improper business advantage for the Company is likely to amount to bribery, and is prohibited. In some cases, attempts are made to disguise bribery through lavish business courtesies or other expenses. This is prohibited.
 - 4.1.3 HCA has a detailed policy on Business Courtesies which is available on Grapevine.
 - 4.1.4 Hospitality and gifts offered or received may have different interpretations in different countries and cultures. What is perceived as an 'acceptable' business gift in one place may be viewed as a bribe in another.
 - 4.1.5 HCA recognises that it is likely that Colleagues will interact with Foreign Public Officials and that business with Foreign Public Officials or entities owned by foreign governments are an important part of HCA's business in countries outside the United Kingdom. Neither the Bribery Act nor this Policy prohibits conducting

business with foreign governments. However, interactions with individual Foreign Public Officials pose a special risk under the Bribery Act and it is extremely important that HCA's dealings with Foreign Public Officials are transparent and open. For more detailed guidance on interacting with Foreign Public Officials please refer to the Business Courtesies Policy.

4.1.6 If in doubt seek advice from the Facility CEO or the Legal Department.

4.2 Responsibilities

4.2.1 Both the Company and you have responsibilities in this area:

4.2.1.1 HCA International provides and administers a detailed policy on Business Courtesies which sets out procedures for the giving and offering of gifts and hospitality, including as regards approval and registration.

4.2.1.2 Colleagues must adhere to the Business Courtesies Policy.

4.2.1.3 All business courtesies must be recorded in the Company's Business Courtesies Log, which is subject to regular audit.

4.2.2 Colleagues should seek advice from your Facility CEO in relation to any questions or concerns you may have in relation to business courtesies.

4.3 Conflicts of Interest

4.3.1 A conflict of interest occurs when someone has a personal interest in a transaction or relationship in which the Company is also interested and which may interfere with the performance of his or her duties towards the Company. Such conflicts have the potential to impair a person's ability to make fair, honest judgements, or could lead them to abuse Company resources for the pursuit of self interest.

4.3.2 You have individual responsibility for ensuring that the Company is informed of any potential conflicts of interest and that management authorisation is sought for any conflict of interest.

4.3.3 You should seek advice from your Facility CEO at first instance in relation to any questions or concerns you may have in relation to conflicts of interest.

4.3.4 A Facility CEO may not authorise conflict of interest matters relating to him or herself. He or she may only be authorised by the Group CEO and the Executive Director/VP Legal & HR Services or the Group CFO and the Executive Director/VP Legal & HR Services. Conflicts of interest affecting officers and directors of the

Company may only be authorised by the Group CEO and the Executive Director/VP Legal & HR Services or the Group CFO and the Executive Director/VP Legal & HR Services.

4.3.5 Factors that may be considered in evaluating a potential conflict of interest are, among others:

- any potential adverse or beneficial impact on HCA's business or proper governance;
- any potential adverse or beneficial impact on HCA's relationships with patients, doctors, regulators or other service providers;
- whether it would enhance or support a competitor's position;
- the extent to which it would result in financial or other benefit to the Colleague in question ;
- the extent to which it would appear improper to an outside observer;
- the opinion of HCA's external auditors.

4.4 Charitable and Political Donations

4.4.1 No donations, sponsorship or support to charities or political parties, causes or campaigns may be made on behalf of HCA unless in accordance with the requirements set out in Appendix II. For the avoidance of doubt, Intermediaries acting for or on behalf of HCA should not make any political or charitable donations or sponsorships, whether indirectly or directly, on behalf of HCA

INTERMEDIARIES

5.1 HCA sometimes does business through intermediaries, either individuals or companies, who perform services for or on behalf of HCA. It is important that HCA has an understanding of who is representing us and that they do their work in a way which is lawful, ethical and in the best interests of HCA.

5.2 An Intermediary, including an agent, joint venture partner or other independent party performing services for or on behalf of HCA, should only be appointed pursuant to the HCA Contracts Approval Policy, Professional Service Agreements Policy or the HCA Overseas Agents Agreements Policy all of which are available on Grapevine.

5.3 HCA requires all third party representatives who perform services for or on behalf of the Company to accept the principles of this Anti-Bribery Policy.

5.4 Responsibilities

5.4.1 Both the Company and you have responsibilities:

5.4.2 HCA has in place procedures as regards the due diligence to be undertaken in relation to Intermediaries.

5.4.3 Employees responsible for the appointment and management of Intermediaries must ensure that they are aware of, have been provided with, and have confirmed adherence to the principles of this Anti-Bribery Policy and related policies, particularly as regards not engaging in bribery to obtain or retain a business advantage, and that this Policy is followed.

5.4.4 In addition, the following persons may not be offered any position without joint prior written approval of the HCA Group Commercial Director, the HCA Executive Director & VP Legal & HR Services and the SVP & Chief Ethics and Compliance Officer (or designee):

5.4.4.1 Anyone who is a current or former Foreign Public Official;

5.4.4.2 Anyone who is a Family Member of a Foreign Public Official; and

5.4.4.3 Anyone whose appointment is requested by a Foreign Public Official.

5.4.5 You should seek advice from your Facility CEO or the HCA Legal Department if you have any questions relating to the appointment or management of Intermediaries.

5.5 Intermediaries' Responsibilities

5.5.1 HCA International only wishes to do business with Intermediaries who meet our ethical standards.

5.5.2 No Intermediary may engage in bribery. Any Intermediary found to be engaging in bribery or other illegal activity may be reported to the relevant authorities. Criminal charges or civil proceedings may result.

5.5.3 Bribery committed by the Company's Intermediaries may also lead to liability to the Company and termination of business dealings with that party and/or to those parties being removed from the Company's list of approved suppliers.

5.5.4 The HCA Purchasing Department, the HCA Business Development and the HCA International Business Department respectively are responsible for maintaining and updating the Company's list of Intermediaries and for documenting the removal of parties from those lists in light of any issues of the kind outlined in this Policy.

- 5.5.5 The Company prohibits the making of facilitation payments by business representatives on its behalf, including Intermediaries.
- 5.5.6 Intermediaries should seek guidance from their HCA International contact if they have any queries as regards what is acceptable ethical behaviour when engaged by HCA International. Such enquiries must be referred on to the HCA Legal Department.

MERGERS, ACQUISITIONS, JOINT VENTURES AND NEW BUSINESS OPPORTUNITIES

- 6.1 When considering a merger, acquisition (in particular acquiring a physician practice or an existing corporate practice), joint venture or new business opportunity the Company should not pay more than the fair market value of the assets acquired. Where physician practices are being acquired, employees must comply with the procedures in the Fair Market Value of Consultant Agreements policy available on Grapevine. This includes guidance on due diligence to be conducted and appropriate anti-corruption wording to be inserted into the agreements. If in any doubt please contact the HCA Legal Department.

CONTRACTS AND EXPENDITURE LIMITS

- 7.1 Contracts entered into on behalf of HCA should be in a form approved by HCA Legal Department. No contract may be signed without such prior approval.
- 7.2 It is good practice for the contracts to contain wording which makes clear that HCA will not permit bribery on its behalf. Appropriate wordings may be obtained from the HCA Legal Department.
- 7.3 Side-letters and other material which varies or expands the terms of any contract are subject to the same principles. No such document may be entered into without the prior approval of the HCA Legal Department.
- 7.4 Approval limits for expenditure are contained in the HCA Contracts Approval Policy available on Grapevine. These must be complied with and failure to do so is a very serious matter.

RECORD KEEPING AND TIMELY REPORTING

- 8.1 It is vital that Colleagues keep books, records and accounts which, in reasonable detail, accurately reflect their business transactions and dealings with and on behalf of the Company.

- 8.2 All transactions and holdings relating to HCA must be recorded in proper detail, and according to the accounting standards applicable from time to time. Such records must be available for audit at any time. No such records may be held elsewhere than at HCA premises and/or on HCA systems, and all such records should be accessible to authorised staff at all times.
- 8.3 No funds or property belonging to HCA may be hidden or disguised from audit or other scrutiny for any reason whatsoever.
- 8.4 No supporting documentation such as invoices or receipts may be forged or post-dated.
- 8.5 HCA requires that:
- 8.5.1 no entry can be made in HCA' books and records that intentionally hides or disguises the nature of any transaction or of any of HCA' liabilities, or misclassifies any transactions as to accounts or accounting periods;
- 8.5.2 all transactions must be supported by appropriate documentation. Predating an agreement, or requesting any person, including a customer, to predate the date of execution of an agreement is prohibited;
- 8.5.3 You must comply with HCA's system of internal controls at all times;
- 8.5.4 No cash or other assets have been or will be maintained for any purpose in any unrecorded or "off-the-books" account or fund;
- 8.5.5 HCA's accounting records are relied upon to produce reports for the HCA Group's management, shareholders and creditors, as well as for regulators and other government agencies. HCA relies upon HCAs' accounting and other business and corporate records in preparing the periodic and current reports that HCA files with the appropriate regulatory authorities. It is imperative that these reports provide full, fair, accurate, timely and understandable disclosure and that they fairly present HCA's financial condition and results of operations. Colleagues who collect, provide or analyse information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that HCA's financial disclosure is accurate and transparent. In addition:
- 8.5.6 You may not take or authorise any action that would cause HCA' financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the appropriate regulatory authorities or other applicable laws, rules and regulations;

- 8.5.7 You must cooperate fully with HCA's Accounting Department, as well as HCA's independent public accountants and counsel, respond to their questions with candour and provide them with complete and accurate information to help ensure that HCA's books and records, as well as HCA's reports filed with the appropriate regulatory authorities, are accurate and complete; and
- 8.5.8 You should not knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of HCA's reports filed with the appropriate regulatory authorities or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of HCAs reports accurate in all material respects.
- 8.5.9 In terms of Anti-Bribery compliance in particular, Colleagues dealing with financial transactions or accounting should be vigilant to identify any payment or transaction which may be:
- (i) a bribe;
 - (ii) a "facilitation payment";
 - (iii) a payment related to other criminality such as money-laundering, blackmail or extortion;
 - (iv) an unauthorised sales commission;
 - (v) the proceeds of crime
- 8.5.10 HCA must not engage in any activity designed to assist any person to evade lawful taxation.
- 8.6 Any Colleague who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a Facility CEO, the Group Chief Finance Officer or another member of the HCA senior management team.

REPORTING BREACHES

- 9.1 The Company provides an Ethics Line that enables anonymous reports of potential violations of this and other anti-corruption policies, the Bribery Act and other applicable anti-corruption laws.
- 9.2 Any Colleague who becomes aware of or receives a reasonably credible report that a potential violation has occurred must promptly make a report to their supervisor, or to the Ethics Officer or via the Ethics Line at 0800 89 0011.

9.3 Any Colleague who fails to report any such warning sign or violations may lead to disciplinary action, including dismissal. Please refer to the HCA Whistle Blowing policy available on Grapevine.

9.4 No Employee will lose any remuneration, including performance-related bonuses, or other benefits for reporting a breach of this Policy.

PROFESSIONAL DEVELOPMENT AND TRAINING

10.1.1 HCA provides Employees with training and professional development opportunities relevant to their role within the business.

10.1.2 As part of this process, every employee is required to take part in the Company's mandatory Ethics Training programme. The training course will include a review of the specific risks faced by the Company and the Company's anti-bribery and corruption policies and procedures, and the steps that are to be taken to avoid and prevent these risks. The HCA Training Department is responsible for delivering the contents of the training program to Colleagues that act on their facilities behalf. The HCA Internal Audit Department will undertake an annual risk assessment for bribery and corruption risk and report their finding to the Group Chief Finance Officer.

10.1.3 In relation to the Company's training programme:

10.1.3.1 Each Employee will be required to participate in the training programme within one month of joining the Company as part of their induction. Thereafter each Employee will be required to attend the training programme annually as part of their performance objectives.

10.1.3.2 A record of the training is to be kept in the Company's Learning Management System.

10.1.3.3 Enhanced training will be provided to certain senior Employees and those operating in high risk areas.

10.1.3.4 The Company encourages its Intermediaries to participate in its training programme.

10.1.4 Employees have an individual responsibility to:

10.1.4.1 Read and understand relevant policy documents and laws;

10.1.4.2 Follow company procedures;

- 10.1.4.3 Keep records of the procedures followed e.g. attendance records, risks and issues registers, meeting minutes, databases and spreadsheets;
 - 10.1.4.4 Maintain agreed standards; and
 - 10.1.4.5 Ask for training and support if a development need is identified.
- 10.1.5 Further details are set out on Grapevine.

APPRAISAL AND REMUNERATION

- 12.1 In carrying out the performance review of an Employee, HCA will have regard to whether, and to what extent, the Employee in question has complied with the Code of Conduct and this Policy. An Employee's performance may be downgraded if he or she has failed to comply with the Code or this Policy or failed to take part in relevant training within a reasonable time. No Employee will lose any remuneration, including performance-related bonuses, or other benefits, for refusing to take action which would amount to a breach of this Policy, or for reporting a breach of this Policy.

COMPLIANCE IMPLEMENTATION AND MONITORING

- 13.1 The implementation of and compliance with this Policy, including attendance at training, will be monitored on a regular basis by the HCA senior management team and HCA Internal Audit Department. This Policy will be reviewed as necessary every year by the HCA senior management team to ensure that it is fit for purpose as part of a routine program of review of the Company's policies and procedures. In particular, HCA will review the areas of greatest ethical risk to the business. As part of this process, the HCA senior management team will be briefed regularly by the HCA Internal Audit Department upon the effectiveness of this Policy, and issues of business ethics, and will consider the extent to which this Policy needs to be updated.
- 13.2 Identifying potential ethical risks is key to protecting the Company from reputational damage, financial loss and business disruption. The Company has strict compliance procedures which are regularly audited.
- 13.3 Compliance monitoring is the responsibility of all Colleagues of HCA International, who need to be mindful at all times to ensure that their behaviour is compliant with this Policy.

INVESTIGATIONS

- 14.1 All suspected cases of criminal activity in breach of this Policy must be referred to the Ethics Officer and to the HCA Legal Department immediately. The Company may refer these matters directly to the law enforcement agencies. External legal advice should be sought.
- 14.2 Where a potential fraud/related crime against the Company is suspected an internal investigation should be conducted by the HCA Internal Audit Department. Depending on the seriousness of the issues, external legal advice should be considered.
- 14.3 The HCA Internal Audit Department should consider whether processes and controls have been followed and recommend any improvements which may be necessary. The Company may refer these matters directly to the law enforcement agencies.

SANCTIONS

- 15.1 Any Employee who is found to have violated the standards set out in this Policy will be subject to disciplinary action. Sanction may range from a warning to termination of employment.
- 15.2 If HCA suspects any Intermediary to have violated the standards set out in this Policy it will seek the urgent cooperation of the Intermediary in investigating and all its legal rights are fully reserved. Sanctions may include termination of any contracts, removal from HCA's list of approved suppliers, civil or regulatory proceedings and reporting suspected crimes to law enforcement agencies.
- 15.3 If a breach was wholly inadvertent on the part of the Colleague, and the consequence of that breach presents minimal legal or reputational risk to the company, the Company may, at its sole discretion, provide additional and enhanced training to that individual instead of or in addition to imposing appropriate sanctions.
- 15.4 The Company reserves the right to report any criminal behaviour to the appropriate investigating authorities.

DEFINITIONS

Bribe	A bribe amounts to an advantage (financial or otherwise), which is sought, received, offered, promised or given as an inducement or reward for the improper performance of an official or business activity, or in circumstances where it is illegal or improper to seek, receive, offer, promise or give the advantage.
Bribery Act	Bribery Act 2010, in force in the UK since 1 July 2011.
CHRO	Chief Human Resources Officer.
Colleague	Collective term for both Employees and Intermediaries.
Company	HCA International Limited.
Employee	Members of staff employed by HCA International Limited whether in an HCA International facility or otherwise.
Ethics Line	Reporting system where Colleagues can make anonymous reports of potential violations relating to corruption or bribery. The Ethics Line access number is 0800 89 0011.
Ethics Officer	Facility CEO.
Facilitation Payment	A payment of minor value made in order to acquire or accelerate performance of a non discretionary task, usually performed by a state official, to which HCA International Limited is entitled. Such payments are illegal under UK law (and in many other countries).
Facility	All HCA International hospitals and operations, whether medical or administrative or otherwise, including, but not limited to, hospitals, consultant and GP practices and all group departments, wherever they may be located.
Facility CEO	Facility Chief Executive Officer is responsible for the running of a particular department, Company facility or hospital.

Family Member	Includes, but is not limited to, husband or wife, natural or adoptive parent, child or sibling, step-parent, step-child, step-brother, step-sister, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent or grandchild, and a spouse of a grandparent or grandchild.
Foreign Public Official	Individual who (a) holds a legislative, administrative or judicial position of any kind, whether appointed or elected, of a foreign country or territory outside the United Kingdom (or any sub-division of such a county or territory) (b) exercises a public function (i) for or on behalf of a foreign country or territory outside the United Kingdom (or any sub-division of such a county or territory), or (ii) for any public agency or public enterprise of that country or territory (or sub-division) or (iii) is an official or agent of a public international organisation.
Intermediary	Individual performing a service for or on behalf of HCA International Limited including agents, representatives, joint venture partners, doctors with consulting privileges, and others. It does not include Employees. A party who is not performing services for or on behalf of HCA International Limited will not constitute an Intermediary.

APPENDIX I

HCA Policies and Procedures

HCA policies and procedures are available on Grapevine. A soft copy of HCA's Code of Conduct is available at <http://www.hcahospitals.co.uk/about-hca-mission.asp>.

- Code of Conduct
- Business Courtesies Policy
- Professional Service Agreements Policy
- Overseas Agents Agreements Policy
- Fair Market Value of Consultant Agreements Policy
- Contracts Approval Policy
- Whistle Blowing Policy
- Global Anti-Corruption Policy

APPENDIX II

CHARITABLE AND POLITICAL DONATIONS

Charitable Contributions and events –A Facility or corporate department's planned or committed charitable contributions should be communicated to the appropriate management level, based upon their management's specific instructions. **In addition, all charitable contributions and payments for charitable events above £5,000 must be approved in writing by the Company CEO and the Company CFO.**

No one else may make a charitable disbursement, nor can the authority to make a charitable contribution be delegated. "Charitable contribution" also includes the non-cash or in-kind donations.