

DEPARTMENT: HealthTrust Ethics and Compliance	POLICY DESCRIPTION: Global Anti-corruption
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EFFECTIVE DATE: July 27, 2016	REFERENCE NUMBER: HT.024
APPROVED BY: HealthTrust Information Governance Council	

SCOPE: All departments within HealthTrust Purchasing Group, L.P. (“HealthTrust LP”) and its direct and indirect subsidiaries including HealthTrust-Europe LLP (“HealthTrust Europe”); the representative office of HealthTrust in Shanghai (“Shanghai Office”) (collectively, “HealthTrust”), and all Advisory Boards.

PURPOSE: To promote compliance by all Employees with the anti-corruption and anti-bribery laws that apply to HealthTrust operations, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“Bribery Act”) and the anti-corruption and anti-bribery laws of P.R. China and other Foreign Countries in which HealthTrust conducts business. This policy prohibits bribes, kickbacks, improper or illegal inducements or other unlawful payments from being provided to any Foreign Official. This Policy focuses on interactions with Foreign Officials, but Employees should be aware that the laws of many or all countries where HealthTrust operates, including the U.K. and China, prohibit the bribery of any person, not just a Foreign Official. Employees must comply with the anti-corruption and anti-bribery laws within their respective jurisdictions and also with those of other jurisdictions that apply to them.

DEFINITIONS: Capitalized terms are defined. See back pages of this Policy.

HIGHLIGHTS:

This is a summary of selected topics and definitions. Please read this entire document for full information.

Giving an improper inducement is prohibited. This Policy prohibits bribes, kickbacks, improper or illegal inducements or other unlawful payments from being provided to any Foreign Official. Employees may offer meals, gifts or entertainment to Foreign Officials to the extent permitted under Policy 4.

Foreign Official means a person employed by, or acting on behalf of, a government or instrumentality of a country other than the U.S, or an entity owned or controlled by such a country (e.g., a government-owned manufacturing or healthcare facility). It includes foreign political parties, their officials and candidates. A person can be a “Foreign Official” even if not treated as one by his or her government, and even if he or she expects to be treated as private businessperson. All references to Foreign Officials herein include his or her Family Members. If a person fits the definition of a Foreign Official, the requirements of this Policy apply equally to the Foreign Official’s Family Members.

Business with Foreign Officials or entities owned by foreign governments is an important part of our business. This Policy does not prohibit conducting business with foreign governments or state-owned enterprises, but interactions with Foreign Officials pose special risks under anti-corruption and anti-bribery laws.

Penalties. Violations of anti-corruption and anti-bribery laws can subject individuals and HealthTrust to criminal and civil penalties, including imprisonment and, for violation of certain U.S. laws, exclusion from U.S. government programs. Disciplinary action can include termination of employment.

Restrictions on giving a thing of value to a Foreign Official. Employees may not give, offer or authorize the giving of anything of value to, or for the benefit of, a Foreign Official, to obtain or retain business, secure any other business advantage, or obtain beneficial governmental treatment, except as permitted in Policy 4. Policy

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4 requires that the thing of value must be provided openly, given only for lawful business purposes, and must not be requested from any person. Its value must be reasonable under the circumstances. If the value exceeds the applicable amount set out on Appendix A, prior written approval of the General Partner’s CCO is required.

Agreements involving Foreign Officials. Before entering into an agreement that involves a Foreign Official in any way (for example as counterparty, negotiator, decision-maker, etc.), obtain prior written approval of the General Partner’s CCO.

Hiring. Approval of the General Partner’s CCO is required to hire any current or former Foreign Official, any person who has a Family Member who is a Foreign Official, or anyone whom a Foreign Official requested HealthTrust to hire.

Third Party Foreign Representative means an independent contractor, supplier, distributor, consultant, representative or agent who has a reasonable possibility of doing the following on behalf of HealthTrust: (1) interacting with a Foreign Official; or (2) contracting with other parties, or otherwise transacting business in, or directed at, a Foreign Country. See Policy 6 and Appendix B.

Mergers, acquisitions, consortia and joint ventures. If considering a merger, acquisition, consortium or joint venture involving a Foreign Official, comply with Procedure 4.

Reporting concerns. An Employee who becomes aware of or receives a report of a potential violation of this Policy must promptly report it. Failure to do so could result in termination.

Effective internal controls and accurate books and records. Any Company expenditure related to a Foreign Official must be accurately and completely documented in our books and records.

Training. All Employees must receive anti-corruption and anti-bribery training commensurate with their position in the Company, as directed by the CEO. All Third Party Foreign Representatives must also be trained.

P.R. China. Appendix D sets out requirements under the law of P.R. China that are in addition to those set out in the main body of this policy.

Business courtesies policies. Employees must also comply with Policy HT.005 – *Business Courtesies Given by HealthTrust to Others*; HT.006 – *Business Courtesies Received by HealthTrust Colleagues from Others*; and Policy HT.019 – *Agreements with Professionals Who May Be Referral Sources*. These policies prohibit bribery of any persons regardless of whether they are a Foreign Official.

POLICY

1. Overview. This Policy prohibits bribes, kickbacks, improper or illegal inducements or other unlawful payments from being directly or indirectly offered or provided to, or authorized for the benefit of, any Foreign Official, in any way related to HealthTrust’s business. If a person fits the definition of a Foreign Official, then the requirements of this policy as to Foreign Officials apply equally to the Foreign Official’s

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Family Members. All Employees must comply with the anti-corruption and anti-bribery laws that apply to the Company's operations, including the FCPA, the Bribery Act, similar laws of P.R. China, and anti-corruption and anti-bribery laws of their respective jurisdictions, and those of other jurisdictions that apply to them.

Appendix D sets out requirements in addition to those set out in the main body of this Policy that apply under the laws of P.R. China. These laws apply to Employees when conducting business (1) within P.R. China, and/or (2) with P.R. China nationals anywhere in the world.

All Employees must also comply with the requirements of Company Policy LL.UK.105 - *Anti-bribery*, relating specifically to the U.K. Bribery Act, to the extent applicable.

2. Compliance responsibilities, risk assessments and oversight of this Policy. All Employees and Third Party Foreign Representatives are required to comply with this Policy and to help prevent violations of it by those whom they directly or indirectly supervise.

Violations of anti-corruption and anti-bribery laws can subject individuals and HealthTrust to serious criminal and civil penalties, including imprisonment and, for violations of certain U.S. laws, exclusion from U.S. government programs. Failure to abide by this Policy can also result in disciplinary action by HealthTrust, including possible termination of employment.

3. Prohibited conduct. Employees may not give, offer or authorize the provision of anything of value to, or for the benefit of, a Foreign Official, to obtain or retain business, secure any other business advantage, or obtain beneficial governmental treatment, except as specifically permitted in Policy 4 below.

Employees may not do indirectly what they cannot do directly. Anything of value that cannot be given directly to a Foreign Official also cannot be given indirectly through a third party, or to a third party at the Foreign Official's request.

4. Scope of permissible expenditures for meals, gifts, entertainment, travel and other things of value for Foreign Officials. This section recognizes that it is likely that Employees conducting business outside the U.S. will interact with persons who would be considered Foreign Officials under the FCPA, including employees of state-owned enterprises. Neither the FCPA nor this Policy prohibits conducting business with foreign governments. However, interactions with individual Foreign Officials pose a special risk under anti-corruption and anti-bribery laws, and it is extremely important that our dealings with Foreign Officials are transparent and open.

Accordingly, any expenditure for meals, gifts, entertainment, travel or other things of value must be consistent with the requirements outlined below. Additionally, nothing in this Policy permits any business courtesy or other benefit that is understood by either party to be offered or provided as an inducement to obtain or retain business or a business advantage, or if it could be perceived to motivate the recipient to

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take improper action.

Before an Employee may directly or indirectly give, offer, authorize or provide anything of value to a Foreign Official, he or she must ensure that all of the following requirements are met:

- a. The thing of value must be provided only for the purpose of lawfully promoting, demonstrating or explaining the Company's services or products, or for other lawful and *bona fide* business activities;
- b. The thing of value must be provided openly and in a way that does not create an appearance of impropriety or illegality;
- c. The Foreign Official must not have directly or indirectly requested from HealthTrust or any third party anything of value for any individual's personal benefit;
- d. Payment for the thing of value must be provided directly to the provider of the thing of value (*i.e.*, the provider of the meal, gift, entertainment or travel) and not to the Foreign Official; and
- e. The value of the thing must be reasonable under all of the circumstances.

If all of the above preliminary requirements are met, the Employee must then determine whether prior written approval of the General Partner's CCO is required as follows:

- i. If the value is less than or equal to the applicable country limit set forth in Appendix A, the thing of value may be provided without prior approval of the General Partner's CCO.
- ii. If the value is more than the applicable country limit, prior written approval of the General Partner's CCO must be obtained per Procedure 1 below.
- iii. If Appendix A does not include a limit for the applicable country, prior written approval of the General Partner's CCO must be obtained per Procedure 1 below.

In rare circumstances when prior-approval under this Policy is not possible, the Employee should consult with the General Partner's CCO as soon as reasonably practical. Even if prior approval is not required or not possible, if the intended recipient is a Foreign Official, documentation and/or receipts substantiating the provision of the thing of value must be obtained and retained, and provided to the General Partner's CCO upon request, per Policy 8 and Procedure 2. The approval and recordkeeping requirements do not apply if the thing of value is provided to another Employee whose hiring or engagement was approved, pursuant to Procedure 3, by the General Partner's CCO.

Employees must also comply with Policy HT.005 – *Business Courtesies Given by HealthTrust to Others*; HT.006 – *Business Courtesies Received by HealthTrust Colleagues from Others*; and Policy HT.019 – *Agreements with Professionals Who May Be Referral Sources*.

5. Charitable donations and political contributions outside the U.S.

- a. Charitable Donations. Before making any donation on the Company's behalf to a charity outside the U.S., Employees must obtain prior written approval of the General Partner's CCO. The General Partner's CCO may delegate to HealthTrust subsidiaries and affiliates located in Foreign Countries the

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authority to approve charitable donations to charities based in the country where the subsidiary or affiliate is located.

- b. **Political Contributions.** Before making any political contribution on the Company's behalf outside the U.S., including but not limited to any elected official, political party, candidate for public office, political campaign, or political party official, Employees must obtain prior written approval of the General Partner's CCO and comply with Procedure 5, Government relations.

6. Additional restrictions applying to agreements involving Foreign Officials and the retention of Third Party Foreign Representatives. Agreements with physicians who may be Foreign Officials must comply with applicable Company policies, including any country-specific policies.

Where there is reason to believe that (a) a supplier of goods or services under any existing or proposed HealthTrust contract or arrangement is a Foreign Official or is owned by or affiliated with a Foreign Official, Employees must consult the General Partner's CCO regarding appropriate due diligence to be conducted and must obtain the prior written approval of the General Partner's CCO before contracting or otherwise arranging to purchase the goods or services.

When requesting approval to hire or renew a contract with a Third Party Foreign Representative to act on behalf of HealthTrust, and in complying with reporting requirements, Employees must follow the Procedures for the Retention of Third Party Foreign Representatives provided in Appendix B to this Policy. Additionally, each Third Party Foreign Representative who acts on behalf of the Company must comply with this Policy. Third Party Foreign Representative compliance is important because, under certain circumstances, the conduct of HealthTrust's Third Party Foreign Representatives could result in civil or criminal prosecution for HealthTrust and/or HealthTrust Employees.

7. Mergers, acquisitions, consortia and joint ventures. When considering a merger, acquisition, consortium or joint venture that could involve a Foreign Official, foreign counter-party, or counter-party that likely engaged in business activity in a Foreign Country or with a Foreign Official, Employees must comply with the procedures for Mergers, Acquisitions, Consortia and Joint Ventures provided in Procedure 4 below. Under certain circumstances HealthTrust can be liable for activities of joint venture partners related to HealthTrust's business or for the anti-corruption and anti-bribery violations of entities that it acquires, even if the violations occurred before HealthTrust acquired the entity.
8. Effective internal controls and accurate books and records. The FCPA and HealthTrust's policies require Employees to maintain and keep complete and accurate books, records and accounts, which in reasonable detail accurately and fairly reflect transactions involving HealthTrust's assets. Although these provisions apply to all corporate transactions, Employees should take special care to ensure that any expenditure of Company funds related to any Foreign Official is accurately and completely documented, regardless of the amount of such transaction. Under no circumstances should 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

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Company shall be established for any purpose.

9. Mandatory reporting.

- a. HealthTrust requires Employees to promptly report if they become aware of or receive reasonably credible information that one of the following may have occurred, is occurring or is likely to occur:
 - Any reasonably credible information of suspicious, unethical or unlawful conduct regarding a Foreign Official or Third Party Foreign Representative with whom the Company is or may become involved, including any of the warning signs described in Appendix C of this Policy (Frequently Asked Questions)
 - a violation of the FCPA, U.K. Bribery Act, or similar laws of P.R. China
 - a violation of any other anti-corruption or anti-bribery law applicable to HealthTrust or
 - a violation of this Policy
- b. Employees must promptly report such concerns listed above to their supervisor, an Employee higher in their reporting chain, the General Partner's COO, or via the HealthTrust Ethics Line, which enables anonymous reports and is further described in Procedure 6.
- c. Any Employee who fails to report any such warning signs or violations may be subject to disciplinary action, including possible termination. HealthTrust strictly prohibits retaliation against Employees who, in good faith, either make reports or participate in the investigation of a report of suspected misconduct.

10. Training requirements. Employees shall receive anti-corruption and anti-bribery training commensurate with their respective positions and duties with the Company, as directed by the CEO. Documentation regarding the training shall be kept in the Company's Learning Management System or other appropriate repository. Third Party Foreign Representatives must receive training on this Policy and applicable anti-corruption and anti-bribery laws as required in Appendix B(1)(g).

11. Promulgation of additional anti-corruption and anti-bribery policies and procedures in Foreign Countries. Subject to the approval of the CEO and General Partner's CCO, HealthTrust subsidiaries and affiliates located in Foreign Countries may promulgate additional anti-corruption and anti-bribery policies and procedures that apply to their respective business units.

PROCEDURE

1. Procedure for obtaining approval prior to providing meals, gifts, entertainment, travel and other things of value permitted by Policy 4. If prior approval of the General Partner's CCO is required by Policy 4 above, Employees must request prior approval by providing the General Partner's CCO with the following information:

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- The name, title, organization and country of the Foreign Official
- A description of the thing of value proposed to be given to the Foreign Official
- The monetary value of the thing, in U.S. dollars and local currency
- Any available documentation and/or receipts substantiating such value if required by the General Partner's CCO
- The business purpose, proposed date and circumstances under which the thing of value is proposed to be given

2. Record-keeping and notification requirements. An Employee who provides a thing of value to a Foreign Official, regardless of whether the value exceeds the applicable limits in Appendix A, must obtain and retain documentation/receipts that substantiate or identify the following, and provide copies of such documentation/receipts promptly to the General Partner's CCO if requested:

- Who: the name, title, and organization of each person involved (including each Employee and each Foreign Official), and the person or entity to whom anything of value was provided
- What: the benefit provided to the Foreign Official (*e.g.*, dinner, tickets, etc.) and the value of the benefit in U.S. dollars and local currency
- When: the date of the request, and the date the benefit was provided
- Where: the location where the benefit was provided
- Why: the business purpose of the benefit conferred, any pertinent circumstances and any business of the Company that the Foreign Official was in a position to influence

The General Partner's CCO shall maintain and retain a log containing the information listed above ("Foreign Official Log"), as well as any communication to the General Partner's CCO requesting permission to provide a thing of value to a Foreign Official. The Foreign Official Log shall also identify any action taken regarding the request. The General Partner's CCO may delegate collection of this information to designees in the U.S. or specific Foreign Countries so long as the information is periodically incorporated into the Foreign Official Log. The requestor shall also maintain a copy of his or her request, and any response, for five years.

Employees must also comply with any applicable reporting requirements of Policy HT.005 – *Business Courtesies Given by HealthTrust to Others*; and HT.006 – *Business Courtesies Received by HealthTrust Colleagues from Others*.

3. Hiring. The following persons may not be offered any position or hired by the Company without prior written approval of the General Partner's CCO:

- Anyone who is a current or former Foreign Official
- Anyone who has a Family Member who is a current or former Foreign Official or
- Anyone who a Foreign Official requested the Company to hire

Because persons in HealthTrust's Shanghai office who are employees of Intellectech (Shanghai) Corporation are not considered to have been offered a position or hired by the Company, the

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requirements of this Procedure 3 do not apply to such persons.

4. Mergers, acquisitions, consortia and joint ventures. To mitigate risks described in Policy 7 above, Employees must:
 - a. Notify the CLO and the General Partner's CCO:
 - Before initiating any communication with a Foreign Official, directly or indirectly, that relates to any merger, acquisition, consortium or joint venture relationship, or
 - If any prospective merger, acquisition, consortium or joint venture relationship involves a prospective foreign counter-party or a counter-party that, within the past five years, is reasonably likely to have engaged in any business activities in a Foreign Country or with any Foreign Official.
 - b. Conduct and review reasonable due diligence. The CLO (or designee) will determine the scope of due diligence to be conducted for each specific merger, acquisition, consortium or joint venture and must review due diligence findings and approve such transaction before it may be closed or consummated.
 - c. Ensure agreements contain anti-corruption and anti-bribery protections. Mergers, acquisitions, consortia and joint venture relationships must be governed by a written agreement containing reasonable anti-corruption and anti-bribery clauses approved by the General Partner's COO that address such laws in applicable jurisdictions to protect HealthTrust.
5. Government relations. Employees must comply with the Company's policies on government relations when engaging in public policy debate or advocacy advertising, lobbying, PAC (political action committee) support, making individual political contributions, or loaning Employees to governments or public organizations.
6. Reporting regarding Foreign Officials. To report a warning sign or violation as required by Policy 9, an Employee may contact his or her supervisor, an Employee higher in his or her supervisory chain, the General Partner's CCO, or the Ethics Line which may be reached as follows:
 - From the U.S., dial 1-800-345-7419
 - From P.R. China, dial 108-11-800-345-7419. After you enter the 108-11 code, a pause and/or prompted response may be required before you enter the Ethics Line number. Dial 108-11 (wait for prompt or operator) and then dial 800-345-7419
 - From the U.K., dial 0800-89-0011, and then dial 800-345-7419

The General Partner's CCO is responsible for overseeing implementation of this Policy. For questions, please contact Lynn Egan at 615-344-3947, Lynn.Egan@HealthTrustpg.com.

DEFINITIONS

Advisory Board means the HealthTrust LLP equity advisory committee, and any other advisory board or committee established by HealthTrust, including without limitation HealthTrust Europe's evaluation panels.

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Anything of value or a **thing of value** should be interpreted broadly to mean anything that could benefit the recipient. Examples include:

- Cash
- Stock or stock equivalents, such as options or warrants
- Gift cards, vouchers or things similar to cash
- Gifts
- Services
- Use of Company facilities, equipment or property
- Entertainment, event tickets, sporting activities such as golf
- Meals, drinks or other hospitality
- Payment for or reimbursement of travel expenses, lodging or vacations
- Offers of employment to the recipient or Family Members
- Discounts or rebates
- Charitable donations to legitimate charities are restricted under Policy 5 if they are intended to obtain or retain business, to secure a business opportunity or any other business advantage, or to obtain beneficial governmental treatment
- Certain political contributions

CEO means the Chief Executive Officer of HealthTrust LP.

CLO means the Chief Legal Officer of HealthTrust.

Colleague means:

- (a) an individual who works full- or part-time for HealthTrust including
 - (i) employees of HealthTrust,
 - (ii) employees of HCA Management Services, L.P. who work for HealthTrust under a management contract,
 - (iii) employees of China International Intellectech (Shanghai) Corporation who are dispatched to work for the Shanghai Office, or
 - (iv) independent contractors (including Third Party Foreign Representatives) providing services to HealthTrust; and
- (b) a HealthTrust member or client who participates on an Advisory Board as a regular or associate participant.

Contracting Officer means the HealthTrust officer who is the Sponsor or who directly or indirectly supervises the Sponsor, and is accountable for executive oversight of a Third Party Foreign Representative and authorizes the HealthTrust contract with the Third Party Foreign Representative.

Employee means any Colleague other than an Advisory Board participant.

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Family Member includes but is not limited to a person’s spouse, common law spouse or domestic partner of the same or opposite sex; natural parent, adoptive parent or stepparent; child or stepchild; sibling, half-sibling or step-sibling; father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law; grandparent, grandchild, and spouse of a grandparent or grandchild.

FCPA means the U.S. Foreign Corrupt Practices Act.

Foreign Country means any country other than the U.S.

Foreign Official means any individual employed by, or acting on behalf of, the government of a Foreign Country (non-U.S.), an instrumentality of the government of a Foreign Country, or an entity owned or controlled by the government of a Foreign Country (*e.g.*, a government-owned hospital or manufacturing facility), or a public international organization (*e.g.*, the World Health Organization). Foreign Official also means any political party in a Foreign Country, any candidate for public office in a Foreign Country or any political party official in a Foreign Country. An individual can be considered a Foreign Official even though he or she may not be treated as a Foreign Official by his or her own government, and even though he or she may expect to be treated like a private businessperson. All references to Foreign Officials in this Policy include **Family Members** of the Foreign Official. If a person fits the definition of a Foreign Official, then the requirements of this Policy as to Foreign Officials apply equally to the Foreign Official’s Family Members. Examples of persons who should be treated as Foreign Officials under this Policy include, but are not limited to:

- Employees of a company owned or controlled by the government of a Foreign Country, even if the government is not the sole owner
- Embassy employees
- Members of royal families and those acting on their behalf
- Physicians and other employees of hospitals, insurers or other entities owned or controlled by national, state or local governments of a Foreign Country
- Customs, tax and licensing officials
- Political party officials of Foreign Countries (even if they do not hold public office) and
- Employees of the World Health Organization

If you do not know whether an individual in or from a Foreign Country is a Foreign Official as defined under this Policy, you are required to treat such person as a Foreign Official when acting on behalf of HealthTrust until you have confirmed that the individual is not a Foreign Official.

General Partner’s CCO means the Chief Compliance Officer of HealthTrust’s general partner, or his or her designee.

HealthTrust or “the Company” means HealthTrust Purchasing Group, L.P. and any of its subsidiaries and affiliates.

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Sponsor means the Employee who has primary responsibility for the selection and oversight of a Third Party Foreign Representative.

Third Party Foreign Representative means an independent contractor, supplier, distributor, consultant, representative or agent of any kind other than an Employee of the Company who has a reasonable possibility of (1) interacting with a Foreign Official on behalf of the Company; or (2) contracting or otherwise transacting business in, or directed at, a Foreign Country with other parties on behalf of the Company. It is not intended to apply to a person or entity who, based on all of the circumstances, in no event could ever reasonably be said to act on behalf of the Company.

REFERENCES/RESOURCES:

Appendices A through D are a part of this Policy:

Appendix A: Guidelines for Expenditures in Specific Countries

Appendix B: Procedures Regarding the Retention of Third Party Foreign Representatives, including Attachment 1

Appendix C: Frequently Asked Questions

Appendix D: China Anti-corruption Laws

Policy HT.005 – *Business Courtesies Given by HealthTrust to Others*

Policy HT.006 – *Business Courtesies Received by HealthTrust Colleagues from Others*

Policy HT.019 - *Agreements with Professionals who may be Referral Sources*

U.S. Foreign Corrupt Practices Act (FCPA)

U.K. Bribery Act; Company Policy LL.UK.105 - *Anti-bribery* (U.K. Bribery Act)

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List of Appendices to this policy

Appendix A - Guidelines for Expenditures in Specific Countries

Appendix B- Procedures Regarding Retention of Third Party Foreign Representatives (including Attachment 1, Checklist)

Appendix C - Frequently Asked Questions

Appendix D – China Anti-corruption Laws