One Person. One Moment. One Decision:

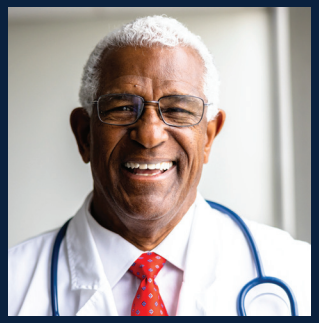
Ardent Health Code of Business Conduct and Ethics

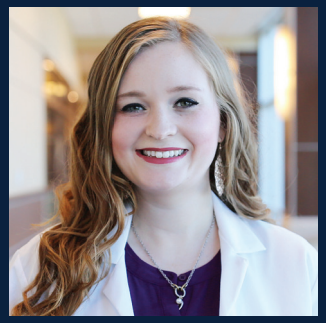
















Ardent Health

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A Message From Dave Caspers, President and CEO

At Ardent Health, we are committed to the highest ethical standards as we work together to fulfill our purpose of caring for people – our patients, our communities and one another. That begins with providing high-quality care and earning the trust of those we serve.

Our Code of Business Conduct and Ethics is one way we bring that commitment to life. It provides a practical resource to guide how we work, how we lead, and how we hold ourselves and one another accountable. It reflects the expectation that, regardless of role or location, we operate consistently and with integrity across our organization.

I have confidence in this team and in our ability to live these standards every day. That means making thoughtful decisions, acting professionally, and speaking up when something doesn't look or feel right. If you see something – even if you're unsure – report it. You can do so anonymously, and anyone who raises a concern in good faith will be protected from retaliation.

At the heart of this Code is a simple but important truth: maintaining our culture of integrity depends on each of us. No matter where we work or what we do, we are all responsible for this standard—one person, one moment, one decision at a time.

Thank you for taking that responsibility seriously—and for the role you play in caring for those we serve.

Sincerely,

Dave Caspers
President & Chief Executive Officer

Our Purpose

Our purpose is caring for people: our patients, their families and one another.

Our Values

At Ardent[1], we believe in aspiring to a higher standard as we work together to fulfill our purpose of caring for people — our patients, their families and one another. The following beliefs help guide our actions and provide every team member with an understanding of what to expect from the organization and one another.

The Ardent Way

What we believe

People first. Always.

We show compassion, celebrate differences and treat one another with respect.

Teamwork wins

We believe healthcare is a team sport and every player has something to contribute.

Simplicity is everything

We are passionate about finding new ways to make healthcare easier to access and deliver.

Think BIG

We pursue extraordinary in everything we do — never settling for good enough.

How we act

Do the right thing

We believe integrity matters and that intentions are nothing without actions.

Make it better

We always look for ways to improve and recognize that even small changes can have a big impact.

Be curious

We know better begins with a question. We encourage each other to ask why and live "what if?".

Own it

We take pride in figuring it out — always seeking solutions, not blame.

[1] The terms "Ardent," "Ardent Health," "Ardent Health Partners," or the "company" as used in this document refer to Ardent Health Partners, Inc. and its subsidiaries, unless otherwise stated or indicated by context.

One Person. One Moment. One Decision.

Commitment to Ethical Business Conduct

Ardent Health is committed to the highest standards of business conduct in our relationships with each other, with companies with which we do business and with our stockholders and others. This requires that we conduct our business in accordance with all applicable laws and regulations and with the highest standards of business ethics.

Our Code of Business Conduct and Ethics states the fundamental principles and key policies and procedures that govern the conduct of our business. This Code describes standards of conduct and expectations for all employees, officers and directors of Ardent.

In addition, this Code does not reflect all policies and procedures of the Company, certain of which are set forth in other policies that are available either through PolicyTech on the Company's intranet website or upon request directed to the Company's General Counsel or Human Resources.

For the avoidance of doubt, in the event the policies and/or procedures of this Code differ from the policies and/or procedures of Ardent's Code of Ethics for Senior Financial Officers and the Chief Executive Officer (SOX Code), the policies and/or procedures of the SOX Code will control for purposes of the officers and directors who are subject to the SOX Code.





One Person. One Moment. One Decision.

Across the country, all of our locations share a commitment to excellence and integrity, understanding that compliance is everyone's responsibility. The Code of Conduct is one of the essential tools we use to guide our daily decisions, and protect our company from harm. We encourage every employee to speak up and report any activity that does not meet Ardent's standards of conduct.



One Person, One Moment, One Decision

Ardent's reputation and success are created one person, one moment and one decision at a time. We each play a crucial role in upholding our Purpose and living our values.

As providers of healthcare, we are united in our Purpose — caring for people: our patients, their families and one another.

Our values support our Purpose and guide our business decisions. They are a fundamental expression of who we are and what we stand for. The guidance in our Code supports us in living our values by connecting them to our day-to-day responsibilities.

How We Uphold Our Code

Our Code is a practical resource meant to guide our decisions and actions. We should read and understand its guidance and refer to it often. It applies to all of us at Ardent.

Each section of our Code lays out the principles and commitments that we uphold. The specific guidance in each section helps translate those principles to the decisions we make every day.

Although the Code covers many topics, it cannot provide instructions for every situation that may occur. In these cases, we use our values and the Ethical Decision-Making framework to guide us.

Policy links provided in our Code refer to the Ardent Corporate policies only. Employees will access their facility-adopted policies at their specific facility site within PolicyTech.

Neither the adoption of this Code nor any description of its provisions constitutes a representation of full compliance with this Code. This Code does not, in any way, constitute an employment contract or an assurance of continued employment. This Code is not intended to create any third-party rights and should be construed to do so.



One Person. One Moment. One Decision.

Our Responsibilities and Obligations

Everyone's Responsibilities

Each of us at Ardent has a responsibility to:

- Read, understand and follow our Code
- Ask for help if we are unsure about a decision
- Speak up if we see ethical concerns or misconduct

Special Responsibilities of Managers and Supervisors

If you supervise others, you have additional responsibilities to:

- Make sure those you lead understand and follow the Code
- Model ethical behavior in your own work and leadership
- Provide the resources needed for your staff and vendors to do their work ethically
- Take every report of misconduct seriously and follow up to ensure it is handled appropriately

Applicability

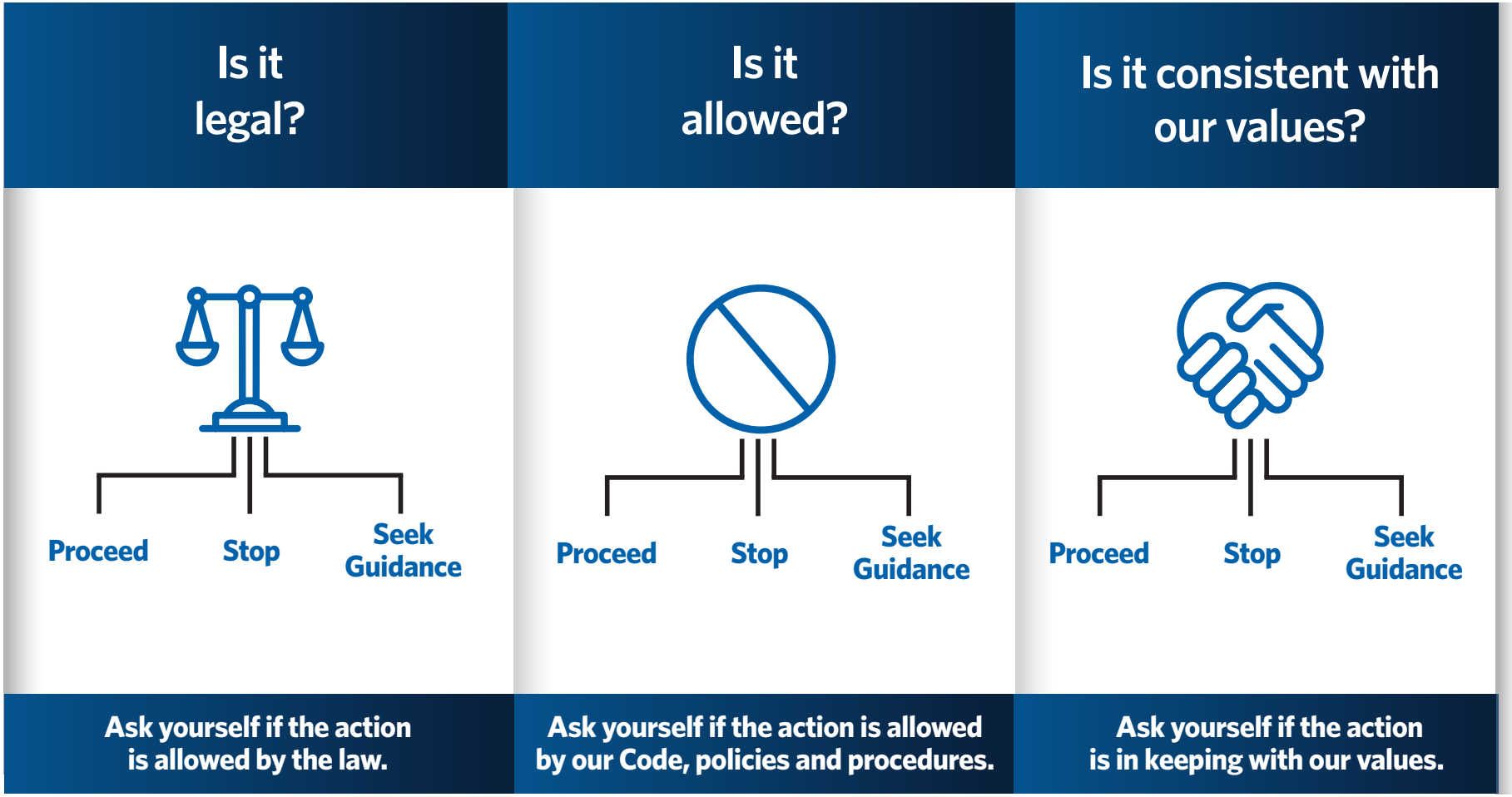
The Code applies to all employees, officers, and directors of the Company, including all employees, officers, and directors of Ardent's subsidiaries (collectively referred to herein as "us" or "we"), and applies whether you are working at the company's premises or at any other location, including working remotely. We are all responsible for knowing and following our Code and living up to its principles every day. That includes full-time and part-time employees, exempt and non-exempt. The concepts described in the Code also apply to those who do business with us, including vendors, third-party contractors and affiliated healthcare providers.

Waivers

Waivers of this Code for directors, employees and officers may be made only by the Audit and Compliance Committee of the board and must be promptly disclosed to all stockholders. Any such waiver must be granted in writing. This Code may be amended or modified at any time by the board of directors.

Making Ethical Decisions

Doing what is right is not always a simple task. This decision-making model will help you work through ethical decisions.



One Person. One Moment. One Decision.

Asking Questions, Raising Concerns

If we see something inappropriate or unethical, or if we witness anything that goes against our mission and principles, it is our duty to report it. If immediate intervention can prevent further harm and can be accomplished without risk of harm to you, affirmative steps should be taken to bring the situation to a halt. By speaking up, we are looking out for the good of our colleagues, our patients and our communities, as well as the long-term health of Ardent.

We also have an obligation to fully comply and cooperate with investigations. Failure to report a known issue or any attempt to obstruct a report or investigation could result in disciplinary action. We all have to work together to maintain our company's integrity.

Ardent has many resources available if you need help. You can raise ethical concerns or questions with:

- Your direct supervisor
- Your department manager
- Your facility's human resources director
- Your facility's compliance officer
- Your facility's CEO or CFO
- Compliance officer
- The Ardent chief compliance officer
- The Ethics Line

Ethics Line

The Ethics Line is a confidential resource for raising ethical concerns at any time. It is available 24 hours a day, seven days a week.

Call the Ethics Line toll-free at
800-633-2939
or access the secured website:
ArdentHealth.EthicsPoint.com

To ensure fairness and confidentiality, the Ethics Line is staffed by non-Ardent specialists who will listen, ask questions and document concerns. On the secured website, you can file your report by answering prompted questions. A confidential case number and security code will be provided for reference.

Confidentiality and Anonymity

Ardent will always handle reports and investigations in a confidential manner to the fullest extent possible. Reports can be made anonymously through the Ethics Line. Sensitive and identifying information will be protected to the fullest extent allowed by law.

Zero Tolerance for Retaliation

Anyone who makes a good-faith report is protected from retaliation. Any information you provide is treated confidentially, within the limits of practicality and the law. Furthermore, we will not tolerate any actions meant to punish or retaliate against an employee who reports a concern in good faith. Making a report in "good faith" means that you have provided all the information you have and

that you reasonably believe there has been a possible violation of applicable law, regulation, rule or standard, this Code or any other Company policy, even if your report turns out to be unsubstantiated.

All instances of substantiated retaliation will result in disciplinary action. Retaliation includes any unfavorable job action (such as termination, demotion, suspension, discipline, reduced hours, transfer, or adverse compensation action), threat, harassment or other discrimination in the terms and conditions of employment.

Retaliation is a violation of this Code and the Whistleblower Policy and Procedures and may also violate the law. Any retaliation should be reported in accordance with this Code and the Whistleblower Policy and Procedures.

What Happens When I Report An Issue?

Your report is sent to Ardent's Corporate Compliance Department.

- The corporate compliance department assigns your report to the appropriate regional compliance officer.
- The regional compliance officer will investigate the report or assign the report to an appropriate individual to investigate.
- Concerns raised about workplace conditions are referred to Human Resources for investigation and resolution.
- When you call the Ethics Line or report using the website, a case number and security code will be provided to you. With this information, you can call the Ethics Line at any time for general updates on the investigation. However, due to patient and employee privacy concerns, specific details will likely be unavailable.

Every report that raises compliance concerns will be investigated thoroughly. We all have a responsibility to cooperate honestly and fully with investigations.





Consequences of Non-Compliance

Ardent makes every reasonable effort to prevent or detect conduct not in compliance with our Code and to correct any such conduct that may occur as soon as reasonably possible after its discovery.

Violating our Code can harm our reputation or our relationships with fellow employees, patients and their family members and our communities. Depending on the circumstances, such violations could also subject Ardent and/or the individual(s) involved to civil and/or criminal penalties.

There may be sanctions if someone breaks the law, violates Ardent's Code or exhibits poor ethical judgment. Subject to applicable law and agreements, employees, officers and directors who violate this Code and/or other Ardent policies and procedures may be subject to disciplinary action, including an oral warning, a written warning, a written reprimand, suspension or termination.

Remedial action for outside parties working on behalf of Ardent could entail contract termination, referral to licensing authorities or peer review and a ban from Ardent premises.

Our Compliance Program

Ardent has established a compliance program that will exercise due diligence to prevent and detect violations of law. This program also promotes an organizational culture that encourages a commitment to compliance with the law.

Ardent's Chief Compliance Officer has direct access to the Board of Directors (Board) or a subgroup of the Board without the need to report to any other individual at Ardent.

As part of Ardent's compliance program, the Chief Compliance Officer or designee:

- Conducts investigations and, when appropriate, includes subject matter experts
- Coordinates internal compliance review and monitoring activities
- Initiates audits based on the Office of Inspector General (OIG) work plan, industry risk and other internal data analytics





We Care About Each Other

As our company expands, our workforce continues to grow to reflect the diverse communities we serve. While each of us brings different backgrounds and experiences, we are united by a common goal — to provide quality healthcare in a safe environment. This goal is rooted in our commitment to doing what is right for our patients, their families, and one another. Our Code of Conduct provides us with the structure we need to hold ourselves and one another accountable to the high ethical standards we have set for ourselves.

We Embrace Diversity, Inclusion and Equal Opportunity

Ardent is committed to fostering diversity and providing equal opportunity based on merit and fair treatment.

Why It Matters

Diverse talents, perspectives and backgrounds make us who we are. By being inclusive and ensuring everyone feels able to contribute, we can draw on these diverse characteristics to make better decisions, solve problems more creatively and work more efficiently. Attracting and keeping the best people means hiring and promoting based on skill and experience. It's not only the right thing to do, but it's our legal responsibility to prevent discrimination.

How We Care

To embrace diversity and inclusion, we:

- Treat others fairly
- Build our teams with diversity in mind
- Seek out and listen to the points of view of others with courtesy and respect
- Speak out if we feel our views or those of others are being disrespected
- Refuse to accept any excuse for discrimination — there are none

We do not discriminate based on:

- Age
- Sex
- Gender identity
- Sexual orientation
- Race
- Color
- National origin
- Citizenship
- Ethnicity
- Disability
- Religion
- Marital status
- Pregnancy
- HIV status
- Military service or affiliation
- Genetic information
- Bankruptcy
- Any other status protected by law

Our non-discrimination policy applies to every aspect of employment, including:

- Recruiting
- Hiring
- Compensation
- Benefits
- Performance evaluations
- Promotions
- Demotions
- Transfers
- Disciplinary action
- Terminations
- Staff reductions or layoffs

Learn more:

- Equal Employment Opportunity and Anti-Discrimination- HR-Corp



We Foster A Respectful Work Environment

Ardent believes that everyone is entitled to dignity, respect and a work environment free from harassment.

Why It Matters

Showing respect to our colleagues and communities is fundamental to our role as providers of care. Recognizing and preventing harassment, bullying and other improper conduct strengthens our relationships and creates a safe, supportive work environment.

How We Care

To create a positive work environment, we:

- Treat one another with dignity and respect
- Avoid saying or doing anything that others might find offensive or degrading
- Immediately report harassment or offensive conduct to Human Resources, Compliance or the Ethics Line
- If immediate intervention can prevent further harm and can be accomplished without risk of harm to you, take affirmative steps to bring the situation to a halt

Learn more:

- Non-Discrimination and Anti-Harassment-HR-Corp



What Does Harassment Look Like?

- It can be about what we say or write (to one another in person, on social media or electronically in texts/chats/emails), including racial, ethnic or gender-based slurs, jokes or stereotypes or using threatening, loud or abusive language.
- It can be about what we do, such as unwelcome touching, making sexual advances or blocking someone's path.
- It can be about what we display, such as placing what others may consider pornographic or sexually suggestive photos or materials in an office cubicle or potentially offensive slogans, posters or bumper stickers in or on Ardent property.

When it comes to harassment, the question isn't what we mean or intend by our words or actions, but how others might perceive or react to them.

One Person. One Moment. One Decision.

Nancy and Frances have worked together for more than two years. They often confide in each other regarding personal and work matters. In one such conversation, Nancy tells Frances she is fearful of a male employee who shows up at her desk several times a day. He also shows up at her car late at night when she leaves work. She feels uncomfortable with his behavior and says she feels she is being stalked. She is concerned the issue may escalate.

Frances is not sure what to do. She worries about retaliation if she reports the employee, but because of her concern for Nancy and the Code's prohibition of retaliation, she decides to contact the Ethics Line to report the issue.

We Strive to Maintain A Safe, Healthy and Secure Workplace

At Ardent, we all should take responsibility for keeping ourselves, our patients and our communities safe, secure and healthy.

Why It Matters

Safety is a top priority. We should always comply with OSHA and other government regulations that are in place to protect us. Not only is it the right thing to do, but it allows us to better care for our patients.

How We Care

To keep everyone safe, we:

- Know and follow all policies and procedures related to health and safety
- Never take unnecessary risks or direct anyone else to do so
- Know what to do in case of injury or other workplace emergencies and cooperate during emergency drills
- Report any unsafe conditions or behaviors immediately
- Call law enforcement in the case of imminent danger

As a healthcare provider, we also take special precautions with hazardous materials, infectious diseases and other biomedical concerns. We should always follow all policies regarding personal hygiene, sanitation, sterilization and disposal of materials.

No Tolerance for Violence

Violence and threats of violence are unacceptable. We should never:

- Bring a weapon, firearm or explosive into a facility
- Strike another person
- Threaten another person
- Stalk another person

Learn more:

- Workplace Violence - HR - Corp

Our Goal is to Prevent Abuse Of Controlled Substances, Drugs and Alcohol At Work

Ardent maintains the highest standards of handling and dispensing controlled substances and strictly prohibits the possession or use of alcohol and illegal drugs.

Why It Matters

Every day we administer thousands of doses of controlled substances. The way we handle and dispense these medications is subject to federal and state regulations. In addition, the use of illegal substances and alcohol poses a danger to the health of the user and our patients.

Violating our substance abuse policy will lead to disciplinary action. Anyone who is suspected of drug misuse could be asked to submit to a drug test.

How We Care

We should ensure the highest standards by:

- Understanding the controlled substance policies and protocols at our facilities
- Following all policies completely every time we handle a controlled substance
- Never bringing illegal drugs or other controlled substances onto Ardent property
- Never consuming or being under the influence of illegal drugs or alcohol while at work
- Talking to a manager if we see a colleague who may be under the influence of alcohol or drugs while at work

One Person. One Moment. One Decision.



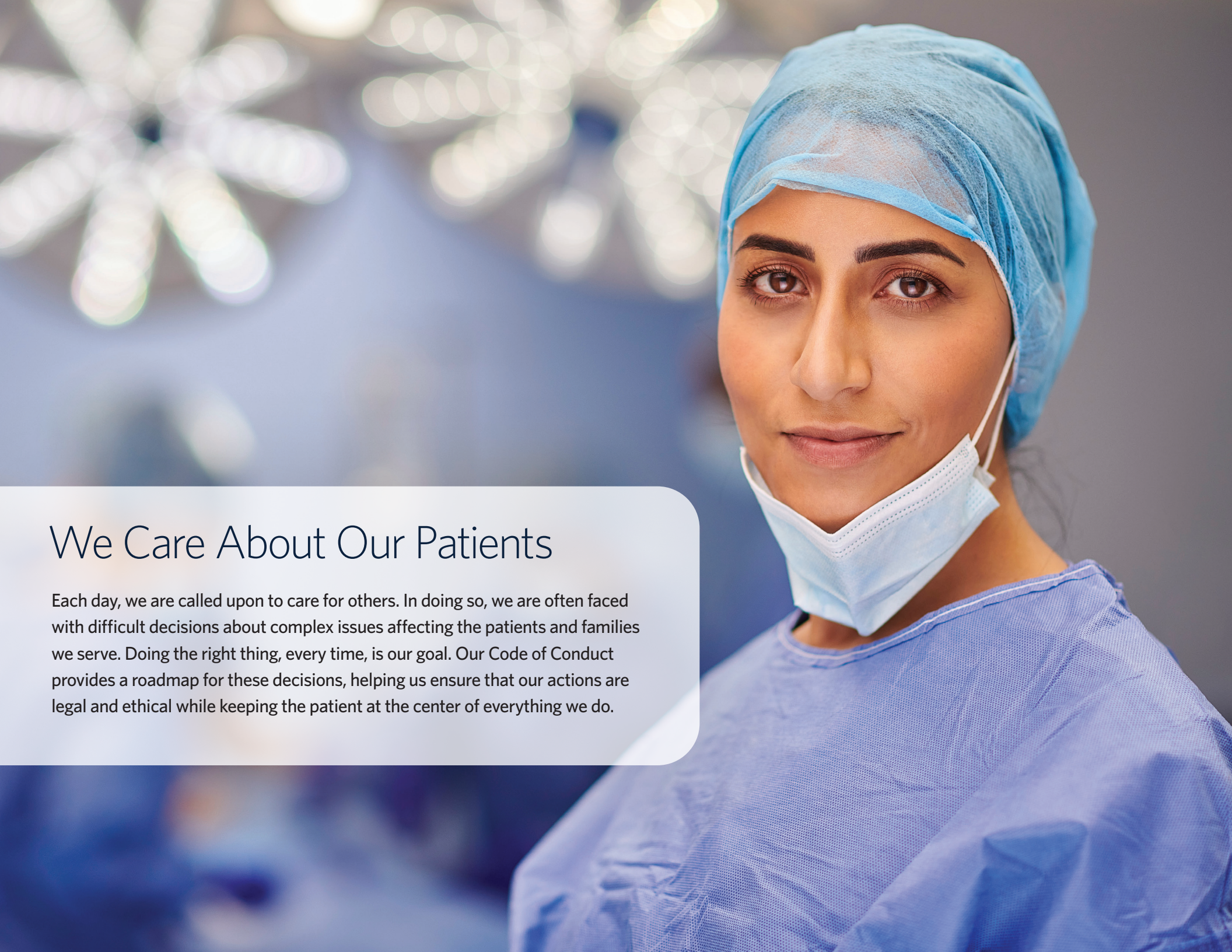
Prescription Medications

Taking over-the-counter drugs or prescription medications is not considered substance abuse. You may carry these medicines with you and take them as prescribed during the course of your work day. However, be aware of all potential side effects, especially when you first start a new medicine or change the dosage. Many legal pharmaceuticals could also impair your judgment and negatively affect your work performance.

Don't hesitate to talk with your supervisor or human resources director if you have any concerns. If you believe someone else is abusing a substance, don't wait. Report it to your supervisor or call the Ethics Line right away.

One Person. One Moment. One Decision.

Randy and Jim work together on the same patient care unit and have become friends. During their shift, Randy tells Jim that he sometimes drinks alcohol during breaks to calm his nerves. Jim debates what to do with this information. On one hand, Jim and Randy are friends and Jim does not want to get Randy in trouble. Randy is not acting impaired; however, Jim knows it is against company policy to have alcohol in your system while at work. Jim determines that even if Randy does not seem impaired, his judgment could still be affected, which could affect the quality of patient care. Jim decides to report to HR immediately.



We Care About Our Patients

Each day, we are called upon to care for others. In doing so, we are often faced with difficult decisions about complex issues affecting the patients and families we serve. Doing the right thing, every time, is our goal. Our Code of Conduct provides a roadmap for these decisions, helping us ensure that our actions are legal and ethical while keeping the patient at the center of everything we do.



We Strive to Provide The Highest Quality Care

Ardent is committed to providing high-quality health services to every patient, at every encounter, every time.

Why It Matters

Continuous improvement in quality of care and patient safety is a top priority at Ardent. We continuously seek ways to improve the quality of care delivered to our patients. We often care for people when they are the most vulnerable. It's a big responsibility and one we take seriously.

How We Care

To pursue the highest-quality care possible, Ardent goes beyond what is legally required of us. We embrace best practices with a comprehensive quality program that investigates, evaluates and incorporates recommendations from trusted government, academic and medical sources.

To ensure the highest-quality care, we should:

- Never bypass quality controls or take shortcuts that compromise the quality or safety of our products
- Be mindful of quality in all we do
- Report quality concerns right away

We Deliver Compassionate Care

Ardent sees patients and their families as people first and treats everyone with respect and compassion.

Why It Matters

The way we deliver care is as important as the care we deliver. Compassion is integral to our role as healthcare providers.

How We Care

We strive to treat each and every patient and patient family member with dignity, respect and compassion — each and every day. We remember that compassion is a vital component of our patients' recovery journeys.



We Administer Emergency Treatment

At Ardent, we provide emergency care to all patients.

Why It Matters

The Emergency Medical Treatment and Active Labor Act (EMTALA) requires hospitals to provide emergency medical treatment to all patients — including pregnant women and their unborn children — regardless of their ability to pay.

How We Care

Anyone who comes to one of our hospitals with an emergency medical condition is given a medical screening examination and necessary stabilization according to the capability and capacity of our facility. If medically necessary, emergency patients are admitted and treated or stabilized.

We only transfer a patient if our facility does not have the capacity or capability of treating the patient, or if the patient or guardian requests the transfer. In these cases, the patient is transferred to an appropriate facility after the facility receiving the patient provides formal acceptance.

In medical emergencies, or if the patient is in labor, we do not delay the medical screening examination or necessary stabilizing treatment in order to collect financial and demographic information.

Learn more:

- Table of Contents for EMTALA Policies

One Person. One Moment. One Decision.

It is a busy night in the emergency room while Lucy is working the triage desk. A patient with a hand injury comes to the desk and requests treatment. Lucy records the patient's information and realizes his hand injury is very serious. She knows it's unlikely that they will be able to treat the injury at her facility — they will need to transfer the patient to another facility 10 miles away.

Lucy believes that by the time the patient is checked in and evaluated by a physician, he could already be at the other facility receiving treatment. Lucy considers whether she should tell the patient to go to the other facility without being evaluated.

Lucy then recalls that anyone who requests emergency treatment must have a medical screening exam before they can be transferred to another facility. Lucy registers the patient, notifies the emergency staff and escorts the patient to a treatment room.

We Are Thoughtful During Admissions and Treatment

Ardent admits, treats and discharges patients based on medical necessity.

Why It Matters

We are committed to creating a safe, compassionate treatment environment where patients and their families understand their individual condition or illness, as well as the recovery process. This includes providing, upon request, reasonable modifications of policies, practices and procedures, as well as auxiliary aids and services, where necessary, to provide persons with disabilities access to our services. Patients are admitted only for medically necessary reasons and discharged when continued treatment is no longer medically necessary. Our hospital management teams ensure that employees and medical staff members never feel pressured to admit or discharge patients on any basis other than medical requirements.

How We Care

Admissions

Our criterion for admission is pure and simple. Does this person need this level of care? Patients are admitted if — and only if — treatment is medically necessary and appropriate. We do not discriminate in any way based on a patient's age, gender, disability, race, religion, sexual orientation or any other unlawful basis.

Treatment

As soon as possible, we provide our patients or patients' representatives with information regarding the diagnosis and anticipated treatment plan.

We provide a clear explanation of the right to refuse or accept care, the right to make advance directives, the risks and benefits associated with available treatment options, information about organ donation or procurement and financial and insurance information. Discharge planning begins at the time of admission and continues throughout the treatment process. We include the patient, the patient's family or guardian, if appropriate, and the clinical team in the discharge planning process.

Discharge

Sending patients home as soon as they're stable and informed is our ultimate goal. That's why we begin discharge planning on the day of admission. Our clinical teams consult with our patients, along with any representatives they wish to include, to set expectations, plan the discharge and arrange any follow-up treatment or care. We want patients to go home equipped with the knowledge and the assistance they need to continue their recovery.

We Communicate Patient Rights and Responsibilities

Ardent strives to uphold all patient rights and provides information necessary for patients to understand their rights and responsibilities.

Why It Matters

From admission through discharge, patients have rights regarding their healthcare and should understand each facility's expectations of patients receiving care. All patients have certain rights, some dictated by federal law, others by state law. We are committed to following all laws and give every patient or designated representative a written statement of these Patient Rights and Responsibilities as part of the admission process.

How We Care

To uphold patient rights, we:

- Offer patients treatment and services without discrimination based on any category protected by state or federal law
- Provide each patient with a plan of care that is easily understood
- Allow patients the right to refuse services
- Ensure every patient and their caregiver receives, as soon as possible, free services of a translator or interpreter to facilitate communication between the patient and healthcare personnel

These are just a few of the patient's rights — each facility publishes its own list of Patient Rights and must give a copy to each patient prior to treatment.

One Person. One Moment. One Decision.

Mark has been admitted to a facility. On admission, it was noted in the electronic record that his primary language is Spanish with limited English-speaking ability.

The next day, the decision is made to operate on Mark. Despite the note regarding his limited English, the medical record does not show that an interpreter was called to explain the procedure. In addition, there is no notation on the consent form that it was translated for the patient.

While ensuring all necessary paperwork has been obtained, the nurse, Sally, notices that Mark is speaking only Spanish but was provided the consent form in English. Sally becomes concerned that Mark may not understand what he is being told. She contacts Interpreter Services to have someone explain consent to Mark, see if he has questions and confirm that Mark consents to the procedure. Sally documents these actions in the medical record, including the need for an interpreter.

Learn more:

- Ard 1557 Dissemination of Non-Discrimination Notice and Statement Policy-CD-Corp
- Ard 1557 Grievance Procedure for Discrimination – Section 504/1557-CD-Corp

You can learn more about patient rights on each affiliate's website and obtain a copy from your local patient registration department.



We Strive to Protect Patient Confidentiality

Ardent strives to protect confidential patient information and fully comply with the Health Insurance Portability and Accountability Act (HIPAA).

Why It Matters

Patients share a great deal of confidential medical data with us, including family medical histories, personal medical histories, diagnoses, prognoses, test results and medications. HIPAA is a federal law that regulates the access, use, disclosure and processing of this health information. We follow all laws and give every patient or designated representative a notice of privacy practices as part of the admission process.

How We Care

To uphold patient confidentiality, we should never:

- Disclose or access patient information unless necessary and authorized
- Discuss a patient's confidential matters in public places, such as elevators, waiting rooms, planes or restaurants
- Post patient information on social media networks and websites, even if we think it doesn't reveal a patient's identity

Ardent has a comprehensive HIPAA Privacy and IT Security program that meets the following standards:

- Each facility has a privacy officer, maintains HIPAA policies and has a HIPAA breach/privacy committee
- Our IT Security department conducts and maintains an annual security risk assessment
- We track and monitor HIPAA concerns and report any disclosures
- We continuously monitor IT security and privacy risks
- When working with patient records, we use only approved systems for any transmission
- We take HIPAA compliance seriously and will apply disciplinary action when appropriate
- If we suspect a violation of HIPAA or a leak of confidential patient information has occurred, we report it within 60 days in accordance with the HIPAA Privacy Rule

Documenting Incidents in RADAR

The RADAR software is available for employees to submit a potential privacy incident. All incidents are documented in RADAR and reviewed to determine the level and amount of information that has been disclosed. The privacy officer will notify the patient and report the disclosure to the Office for Civil Rights when appropriate.

One Person. One Moment. One Decision.

Dan, a coder, has recently obtained a power of attorney for his father's medical decisions. Unfortunately, his father lives several states away, so Dan is always worried about him.

As a coder, Dan has the ability to access his father's health information within the electronic health record (EHR) platform. Dan knows his father just had a physician office visit during which labs were completed. Dan wants to know the results, but calling his father to find out is a struggle. Before Dan looks up his father's information, he emails the privacy officer to see if it is appropriate.

The privacy officer reminds Dan that it would never be appropriate to access a family member's or friend's records through his access as a coder. The privacy officer suggests that Dan register for the hospital's normal patient portal access process that is available to all patient-authorized family members.



Learn more:

- Table of Contents for HIPAA Privacy Policies

We Partner With Physicians To Provide The Best Care Possible

Our facilities actively pursue relationships with independent healthcare organizations and physicians who may refer patients to us in order to provide the best possible care to our patients.

Why It Matters

Working with highly skilled, quality-minded physicians is critical to our success. We take pride in partnering with physicians to provide the best care possible for our patients.

How We Care

We expect affiliated healthcare providers to share our high ethical standards and commitment to quality care. In return, affiliated healthcare providers should expect that we will have the same high ethical standards and commitment to quality care as they do.

Compensation Rules

The government regulates all compensation arrangements between physicians and hospitals. Any compensation between a hospital and a physician must be approved by Compliance and/or Legal.

Our compensation policies are transparent and fair. We will:

- Pay contracting physicians in a timely and accurate manner
- Pay fair market value for commercially reasonable services
- Require submitted invoices to include the dates and descriptions of services provided and, in some cases, the amount of time spent performing each service
- Ensure that payments are supported by a written, signed contract or fall into a regulatory exception (consult with Legal or Compliance)

We will not:

- Provide any financial incentive to influence a healthcare provider's admission, referral or length-of-stay decisions
- Offer an affiliated physician a gift, bonus or any other payment that does not meet a regulatory (Stark) exception

It is your duty to understand the regulatory requirements before making or receiving any financial arrangement with a physician. Ardent has a comprehensive physician contracting process that you must follow. Questions can be directed to your local compliance officer or to your legal operations counsel.

One Person. One Moment. One Decision.

Dr. Jones is the top cardiologist in the southeastern states. Dr. Smith, the hospital's Chief Medical Officer, would like to recruit Dr. Jones as the medical director for the cardiology department.

Dr. Smith meets with Douglas, the hospital CEO, to discuss Dr. Jones. After interviewing and meeting Dr. Jones, Douglas and Dr. Smith agree he is the best candidate. Douglas sends Legal the contract to make sure it is within fair market value and has the appropriate contract terms and medical director description.

Dr. Jones wants to start right away, but Douglas and Dr. Smith are aware of Ardent legal policies and the Stark Law. They make it clear to Dr. Jones that he cannot start work until a signed contract is executed.

Learn more:

- Table of Contents for Legal Policies



We Have The Proper Licenses and Certifications To Perform Our Work Duties

All Ardent-affiliated healthcare providers are required to have proper and current credentials.

Why It Matters

Our patients and communities expect nothing less than the best qualified caregivers and we take every measure to deliver that advantage to every patient, every day. We follow the state and federal standards set for healthcare providers, including licenses, certifications and accreditations issued to attest to skill.

How We Care

To stay up-to-date, we:

- Keep our licenses and certifications current
- Renew credentials on schedule and fulfill continuing educational credit requirements
- If we work as contractors, make sure we are prepared to show proof of current status

You are responsible for keeping licenses and certifications up to date. If you become aware of an issue, contact Human Resources immediately.

We Participate In Medical Research and Clinical Trials

We participate in medical research and clinical trials with care and diligence.

Why It Matters

Research relationships are governed by Institutional Review Board rules as well as facility policies, both of which prohibit any tampering, misreporting or misconduct. We understand that our data could affect thousands of patients for years to come.

All studies including retrospective, observational or data collection require review and approval from each facility's research committee or administration.

How We Care

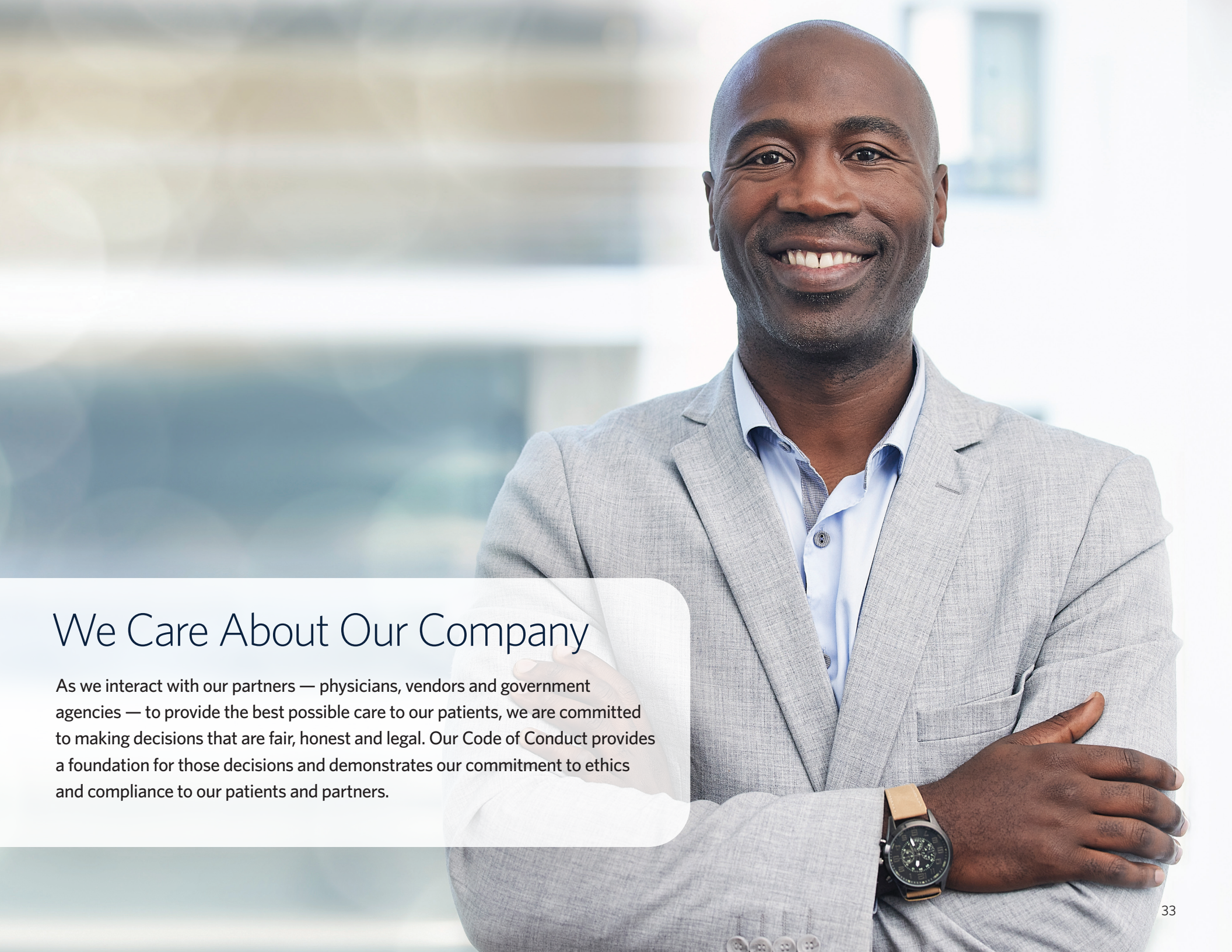
Researcher Rights

The research professionals we work with have a right to expect:

- High-quality information
- Complete confidentiality
- Professional conduct
- A collaborative environment

Research Participant Rights

- Patients who participate in a research project have the right to expect:
- A choice about whether or not to be involved
- An explanation of all the services and options available to them
- A complete description of the purpose and potential benefits of the research
- Full disclosure of any and all risks
- Regular updates about their condition



We Care About Our Company

As we interact with our partners — physicians, vendors and government agencies — to provide the best possible care to our patients, we are committed to making decisions that are fair, honest and legal. Our Code of Conduct provides a foundation for those decisions and demonstrates our commitment to ethics and compliance to our patients and partners.

We Ensure The Integrity Of Our Financial Controls

Ardent understands and respects the need to follow the company's internal controls, which are designed to promote efficiency, ensure reliable financial reporting and comply with the law.

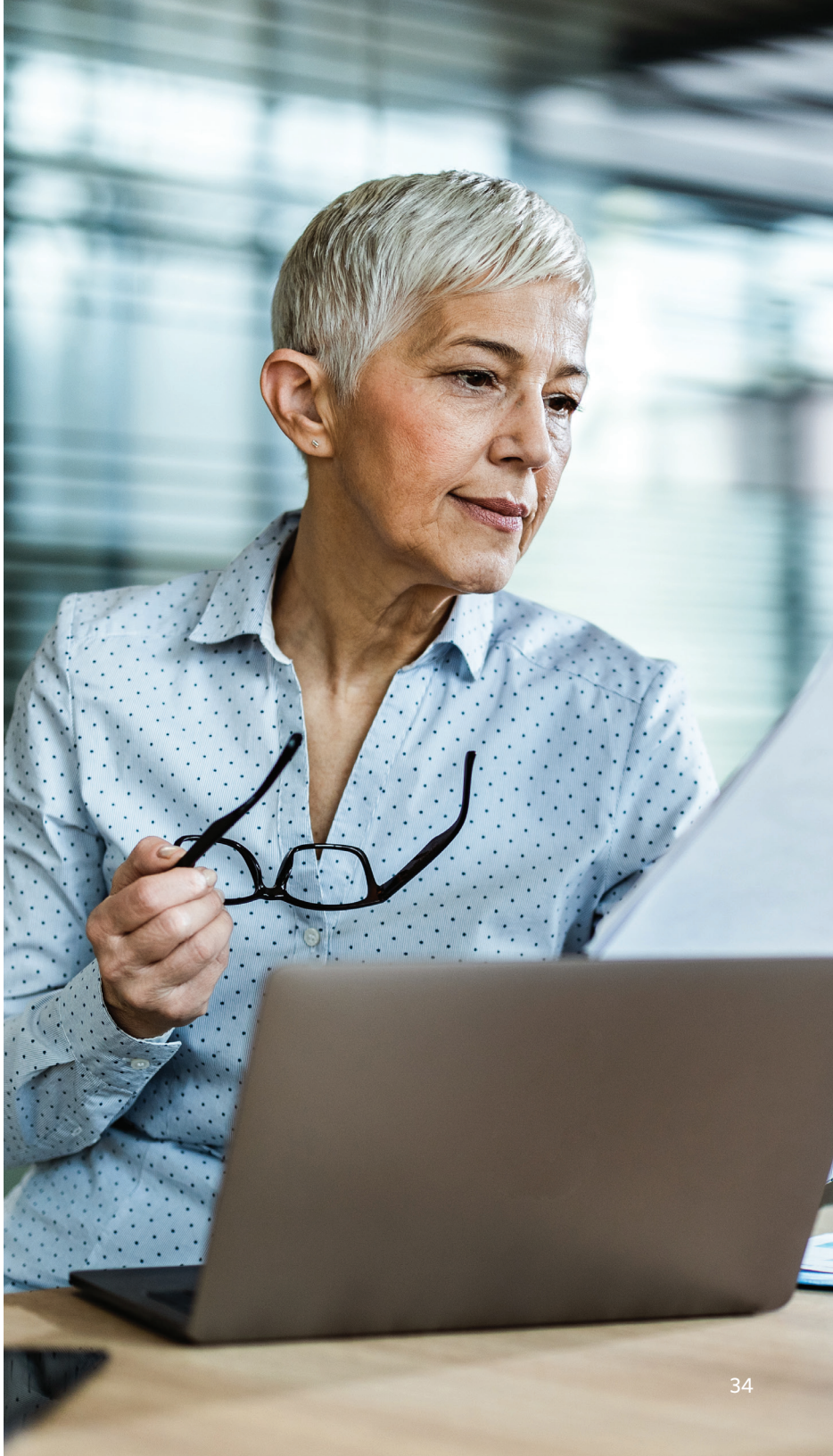
Why It Matters

Internal controls and procedures are in place to protect Ardent, as well as our patients, vendors, payors and stockholders. These controls help to prevent fraud, minimize errors, promote efficiency and achieve compliance with the law.

How We Care

To maintain financial integrity, we should:

- Follow all internal controls or procedures that apply to our role
- Never bypass an internal control, even if doing so might seem harmless
- Immediately report any bypassed or overridden control or procedure to Internal Audit, Compliance or the Ethics Line



We are Committed to Maintaining Accurate Billing and Coding

Ardent ensures the integrity of our billing process and guards against any false, fictitious or fraudulent claims.

Why It Matters

We are reimbursed for our services by a number of payors. The government, insurance companies and individuals all pay a portion of our revenues. It's our job to fully comply with all regulations and to provide our stakeholders with accurate, complete and timely billing information.

How We Care

We have several devices in place to certify the integrity of our billing processes and guard against any false, fictitious or fraudulent claims:

- **Employee Orientation and Training:** Ongoing training and evaluation ensures that we maintain our standards. These measures also consistently reinforce the high level of quality we expect in all financial matters.
- **Billing Controls:** We've built internal controls into our billing systems. If our job includes coding or billing activities, we follow all applicable policies. We also have software systems that provide controls.
- **Cost Reports:** Detailed analyses of charges by department are required in Medicare and Medicaid reimbursement. They often include statistical data on patient numbers and provider reports that give our company additional insight into the financial health of our facilities and services.
- **Audits:** Routine billing and coding audits spot-check our systems. Government agencies and other payors may also verify accounts with audits. We cooperate fully with audits.
- **Investigations:** We proactively seek the truth when there is a report or suspicion of inappropriate activity. Outside agencies and companies may also request our assistance with an investigation. We cooperate fully with lawful investigations.
- **Destruction:** We will not obstruct or interfere with an audit or investigation by destroying requested documentation such as email, reports, handwritten notes, etc. At all times, we provide accurate and timely information.

One Person. One Moment. One Decision.

John works in the billing department of a clinic and notices that several claims may lack sufficient documentation. He questions whether some of the billed services were properly coded. However, because of poor revenue performance during the last quarter, John feels compelled to help the clinic and submits these claims to the government for payment.

One of John's coworkers learns of John's behavior and files an anonymous complaint through the Ethics Line alleging that John has placed the organization at risk for potential violations under billing regulations.

Here, John had a duty to ensure that the clinic billed for services provided, the claims were properly documented and the clinic used accurate billing codes. If he wasn't sure, he should have called Compliance or the Ethics Line.

What Is a False Claim?

Examples of potential false claims include:

- Billing for services that were not provided
- Billing for services that were provided but were not medically necessary
- Submitting inaccurate or misleading claims about the types of services provided



We Award Vendor Contracts Based On Merit

Ardent awards vendor contracts based only on business criteria such as quality, price and availability.

Why It Matters

Many factors affect our purchasing decisions. Awarding vendor contracts based on merit is not only better for our business, but it is our ethical and legal responsibility. We must avoid even the appearance of improper behavior.

How We Care

We always:

- Operate in full compliance with all laws
- Conduct business professionally and ethically
- Ensure vendors are aware of our Code and related policies
- Refuse and report any gifts or money vendors may offer us in exchange for business

We expect vendors to:

- Win business based only on their ability to meet our needs
- Hold themselves to the highest legal, ethical and professional standards
- Ensure any subcontractors understand and comply with our policies and standards
- Respect patient privacy

One Person. One Moment. One Decision.

James, the hospital CFO, is friends with Dawn, the owner of a landscaping company. James's son works for Dawn. After the hospital's current landscaping company raises prices, James sends a request for proposals to several new companies — including Dawn's. James receives seven proposals. Dawn's company is the second highest bid.

James reviews the Conflict of Interest Policy and decides the best course of action is to remove himself from making the decision. He hands off the project to the controller but doesn't disclose his relationship with Dawn. The controller reviews all bids that offer the same level of service, and ultimately goes with the lowest bid.

While James was correct to remove himself, he should have also revealed the potential conflict of interest by filling out the conflict of interest form and providing it to his supervisor and Compliance.

Learn more:

- CD005 Vendor Promotional Training (Non-Pharmaceutical or Medical Device Manufacturers)-CDCorp
- CD024 Vendor Access to Facilities and Product Introduction- CD-Corp

We Compete Fairly and Honestly

Ardent competes ethically and honestly for business. We succeed on the quality of care we bring to patients — never through inappropriate conduct in the marketplace.

Why It Matters

Ardent believes in fair competition. In every business relationship, our quality should speak for itself. Strong competition keeps us on top of our game. The laws designed to maintain free and fair competition — known as antitrust laws — determine how companies can compete and interact with each other.

We follow these laws not only because it is the right thing to do, but also because violations can result in significant fines, damage to our reputation or even criminal charges.

How We Care

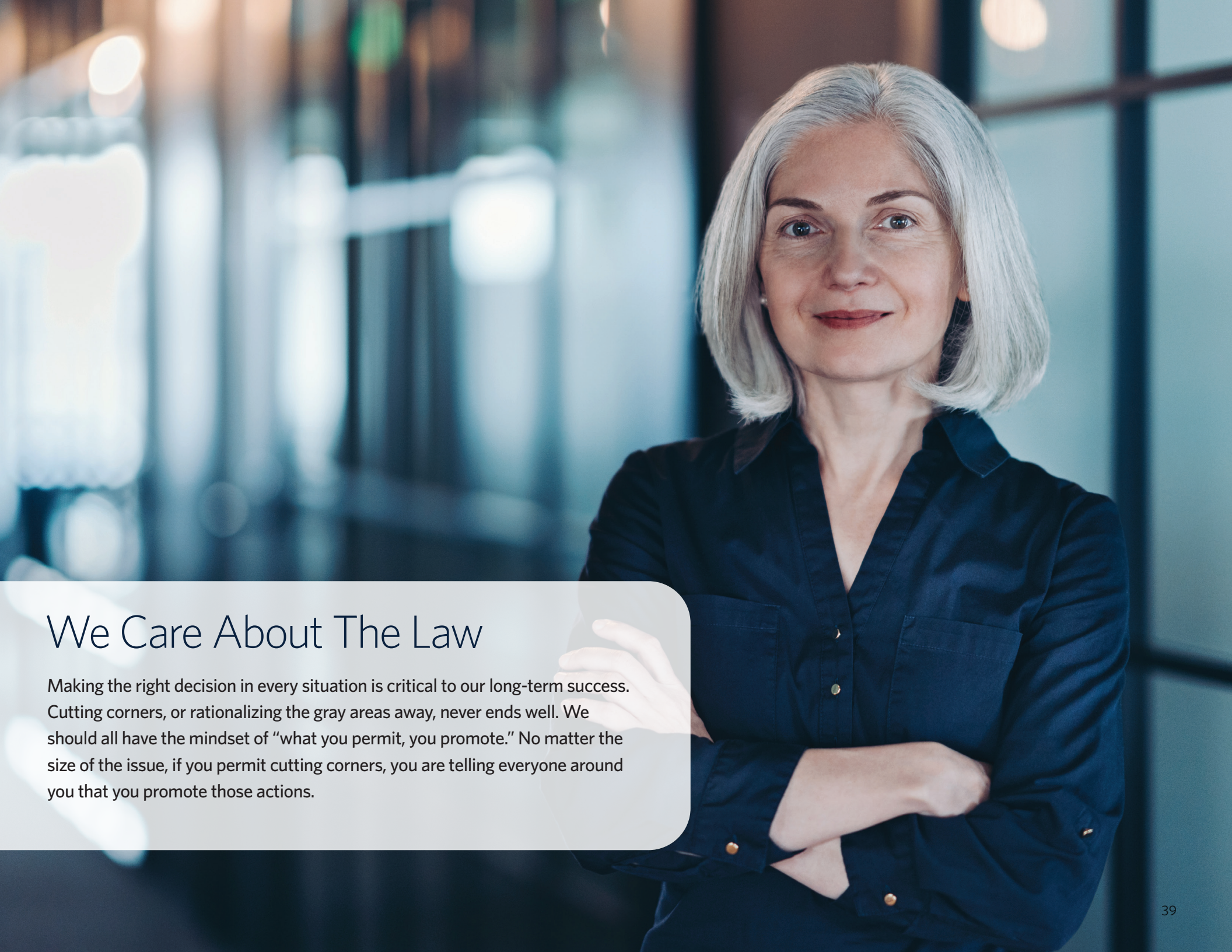
We have no need to resort to unethical practices.
We should always:

- Behave professionally and treat others with respect
- Deal fairly with all parties
- Avoid false or dishonest practices

We should never:

- Hire a competitor's employee to gain proprietary knowledge
- Learn confidential trade secrets and information
- Obtain competitor strategies and plans
- Discuss or negotiate pricing, bidding processes or the way we divide markets with competitors
- Make false claims or negative comments about competitors' products or unlawfully interfere with their business relationships
- Use illegal or questionable actions to obtain competitive information
- Use our market strength or market information in any way that might unfairly harm or prevent competition
- Accept bribes or kickbacks
- Enter into anti-competitive arrangements, such as agreements with competitors that affect prices, costs, terms or conditions of sale, the markets in which we and/or they will compete, or customers or suppliers with whom we and/or they will do business
- Take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice

If we witness any attempts by competitors or colleagues to have improper discussions or make illegal arrangements, we should immediately report them to Legal, Compliance or the Ethics Line.



We Care About The Law

Making the right decision in every situation is critical to our long-term success. Cutting corners, or rationalizing the gray areas away, never ends well. We should all have the mindset of "what you permit, you promote." No matter the size of the issue, if you permit cutting corners, you are telling everyone around you that you promote those actions.

We Strive to Comply With The False Claims Act

Ardent strives to comply with all federal and state false claims laws.

Why It Matters

The federal False Claims Act (FCA) is the federal government's key vehicle to enforce healthcare fraud and abuse laws. Anyone who knowingly submits or causes the submission of a false claim to the federal government (including federal healthcare programs, such as Medicare and Medicaid) or improperly retains an overpayment paid to them by the federal government may be subject to substantial civil monetary penalties per false claim, treble damages, and potential exclusion from participation in federal healthcare programs.

In addition to the federal law, many states — including the states where our facilities are located — have false claims laws. The prohibitions and penalties under these laws vary from state to state.

How We Care

We do not tolerate retaliation or harassment against any employee, contractor or vendor who reports an FCA concern. Federal and state false claims laws provide protection for reporters who are discriminated against in the workplace as a result of their efforts to follow the FCA or report a violation, including all relief necessary to make the employee whole.

Learn more:

- CD023 Idaho False Claims Act Compliance Policy-CD-Corp
- CD023 Kansas False Claims Act Compliance Policy-CD-Corp
- CD023 New Jersey False Claims Act Compliance Policy- CD-Corp
- CD023 New Mexico False Claims Act Compliance Policy- CD-Corp
- CD023 Oklahoma False Claims Act Compliance Policy- CD-Corp
- CD023 Tennessee False Claims Act Compliance Policy- CD-Corp
- CD023 Texas False Claims Act Compliance Policy-CD-Corp
- CD023-Attachment A - List of Ardent Policies for Detecting and Preventing Fraud, Waste and Abuse



We Must Not Engage In Unacceptable and Illegal Activities

Ardent's policy is to always follow the law.

Why It Matters

Following the law is more than mandatory — it's the way we earn trust. Doing so protects our relationships and the honest employees who work with integrity every day.

How We Care

As ethical and law-abiding employees, we should never:

- Offer, pay, accept, or solicit bribes, kickbacks, payoffs, inducements and other corrupt payments
- Engage in corruption, extortion or embezzlement in any form with any third party
- Let gifts influence our business decisions
- Engage in behavior that could constitute fraud, such as:
    - Falsifying financial or medical records
    - Ordering unnecessary tests or procedures for personal gain
- Steal anything, including company supplies, patient belongings or confidential information
- Fail to accurately record and bill tests, medications or procedures
- Engage in money laundering or actions that violate applicable money-laundering laws

- Facilitate payments to expedite the routine performance of legitimate duties, except in extraordinary circumstances as approved by the General Counsel.

We should not use agents, consultants, independent contractors or other third parties to do indirectly what we cannot do directly under this Code or applicable laws, rules, and regulations.

Insider Trading

In the course of doing business, we may have access to financial information or other information that is not available to the public. Buying or selling publicly traded securities while in possession of material nonpublic information is strictly prohibited. This conduct is known as "insider trading." Passing on such information to someone who may buy or sell securities — "tipping" — is also illegal.

What Is Material Nonpublic Information?

Nonpublic information is considered "material" if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security. If you have any question about what constitutes insider trading, you should consult our Insider Trading and Confidentiality Policy and consult with Ardent's general counsel.

The Only Choice: Report It

Insider trading, theft, fraud and bribery are all illegal activities. Anyone who commits these acts could face termination and severe legal consequences. If you ever receive an illegal offer or witness an illegal action, you must report it immediately — it's the right thing to do.



We Cooperate With Government Agencies

Ardent cooperates with local, state and federal agencies on any investigations, audits or lawful requests for information.

Why It Matters

We cooperate with a wide range of government agencies, from local law enforcement to state and federal departments of health and human services.

How We Care

When working with the government, we must:

- Be aware of and comply with all relevant laws, regulations, policies and processes
- Communicate truthfully and transparently
- Make sure to fully meet our commitments to ensure that public funds are used appropriately
- Respond in a timely, complete and accurate manner to all lawful requests for information
- On receipt of a request from a government agency, notify your facility risk management director, divisional compliance officer, general counsel, legal operations counsel or the chief compliance officer

We Maintain Accurate, Timely and Complete Records

Ardent maintains complete and accurate records so that we can make responsible business decisions and provide truthful and timely information to investors and government agencies.

Why It Matters

Ardent produces and receives large numbers of documents. We are committed to compliance with all applicable laws and regulations relating to the preservation of records.

Our policy is to identify, maintain, safeguard and destroy or retain, as applicable, all records in Ardent's possession on a systematic and regular basis.

Managing our records and information effectively increases operating efficiency, reduces risk and improves performance. When we take care with our records, we're complying with the law and improving Ardent's long-term stability at the same time.

How We Care

Everyone who handles a document has a responsibility to follow proper procedures as outlined in our comprehensive Records Retention and Destruction Policy. Everyone whose job includes records management must review this policy carefully. All documents must be completed accurately, truthfully and in a timely manner, including all travel and expense reports. When applicable, documents must be properly authorized. Ardent's financial statements must be recorded in compliance with all applicable laws and accounting practices, and the company's internal controls, to enable full, fair, accurate, timely, and understandable disclosures.

We should always:

- Comply with internal controls and all relevant laws and regulations
- Maintain books, expense reports and receipts that honestly reflect financial transactions
- Ensure documents are properly authorized when applicable
- Submit records to internal and external auditors promptly and accurately when requested
- Comply with document preservation or "hold" notices

We should never:

- Create false or misleading entries, records or documentation
- Make a payment or establish an account on behalf of Ardent with the understanding that any portion is to be used for a purpose other than those explicitly described by the supporting documents

We identify, maintain, safeguard and dispose of records in accordance with our records retention schedule and relevant laws and regulations. We must ensure that our records are:

- Easily accessible
- Organized
- Secure
- Never selectively edited
- Never discarded before they meet retention requirements

Be aware that not every document is a record that needs to be maintained — excessive retention of protected health information can create unneeded HIPAA privacy risks.

Subpoenas, Litigation and Investigations

If we are notified or become aware of a subpoena, a pending or contemplated litigation or government investigation, we must:

- Retain and preserve all records relevant to the inquiry
- Preserve any records that would automatically be destroyed or erased (such as emails and voicemails)

One Person. One Moment. One Decision.

Mary is a clinician who works on a nursing unit and provides treatment services to patients. Mary has a habit of documenting in the chart later, sometimes even days, after treating patients. She also does not provide sufficient documentation on some of her encounters.

Mary's charting delays and poor documentation resulted in a near-miss incident where a provider could have potentially harmed a patient by prescribing medications that would have likely caused severe adverse reactions.

Here, Mary should have ensured that her documentation was accurate and completed on a timely basis. Delayed or poor documentation could impact the organization's ability to receive payment from a federal or state healthcare program. It could also jeopardize patient care. Mary's supervisor should have taken action earlier and could also be responsible for any lapse in compliance. Mary's behavior may also be non-compliant with hospital policy and nursing licensure related to timely documentation.

Learn more:

- CD011 Records Management-CD-Corp
- CD011-A Record Retention Schedules-CD-Corp

What Is Confidential Information?

Examples of information that is highly confidential include:

- Patient medical information
- Patient financial records
- Clinical information
- Research data
- Patient lists
- Information obtained from employee personnel record
- Pricing and cost information
- Merger, acquisition, divestiture and other financial information
- Company strategies
- Company passwords
- Information about Board and Board committee deliberations

Trademarks, Copyrights and Intellectual Property

We respect and protect the intellectual property of Ardent and other companies. We:

- Use the name, trademarks and logos of other companies properly
- Alert the general counsel of any infringement on Ardent's trademarks or other intellectual property
- Never make or use unauthorized copies of copyrighted materials

Individuals may sometimes develop ideas, processes, and technology on Ardent's behalf or in the scope of their work for the company that will be protected by patents, copyrights, trademarks, or trade secret laws. This "intellectual property" usually belongs to the company, depending on the situation. As required by law and subject to the terms of your employment, each of you agrees to assign the rights to any such intellectual property to the company.

When to Disclose

To maintain the confidence of our patients, affiliates and communities, we must keep information confidential and safeguard it carefully. We can only disclose confidential information if:

- Our position with Ardent requires us to do so
- We are authorized to share it with the person or organization requesting the information
- The person or organization requesting the information has a legitimate need to know
- The person or organization agrees to keep the information confidential

Data Privacy and Protecting Employee Data

Ardent protects personal data through organizational and technical measures including IT security tools, restrictions on access to the data and physical security measures to help prevent unauthorized or unlawful access, disclosure, loss, destruction, or damage. The Company accesses and uses personal data only for legitimate business purposes and maintains appropriate access controls and use limitations. Only those individuals who need the data to accomplish a business objective should have access to personal data and only for as long as they need it to accomplish the objective.

We are required to follow all applicable privacy, information security and data protection laws that govern the handling, use and retention of personal data, which means any information that, standing alone or in connection with other data, could be used to identify the individual to whom the information relates. Some information is particularly sensitive personal data, such as health information, government identification numbers and compensation data, and is subject to even further protections.

Any collection, storage, processing, transfer, sharing or use of personal data must be done in a manner that protects such data from inadvertent or unauthorized access, use, disclosure, loss, destruction or damage, and any authorized disclosure or use must be in compliance with local laws.

We Avoid Conflicts Of Interest

We act in the best interests of our patients at Ardent at all times.

Why It Matters

Conflicts of interest can cause serious harm to Ardent. Even the appearance of a conflict could put Ardent's reputation at risk. When we make sound, unbiased decisions, we protect the trust we've earned as one of the best and most ethical hospital operators.

How We Care

We protect Ardent when we:

- Always put the company's interest ahead of our personal interests
- Avoid even the appearance of a conflict of interest
- Ask for help if we aren't sure whether a situation could be a conflict
- Disclose any actual or possible conflicts of interest
- Follow all guidance for managing actual or possible conflicts

Managing Conflicts of Interest

Most conflicts can be managed as long as we disclose them properly. Remember:

- Employees must disclose conflicts of interest using the electronic form. Officers must disclose conflicts of interest to the General Counsel or Chief Compliance Officer to:
    - Assess the nature and extent of the conflict
    - Advise management on how to resolve the conflict
- Board directors must disclose conflicts of interest to the chairman of the board.

What Is a Conflict of Interest?

A conflict of interest occurs when our personal interests interfere with Ardent's. These situations are a problem because they could keep us from making objective decisions and doing our best work.

Examples of Potential Conflicts of Interest

Some situations are more likely to lead to a conflict of interest. Take special care with:

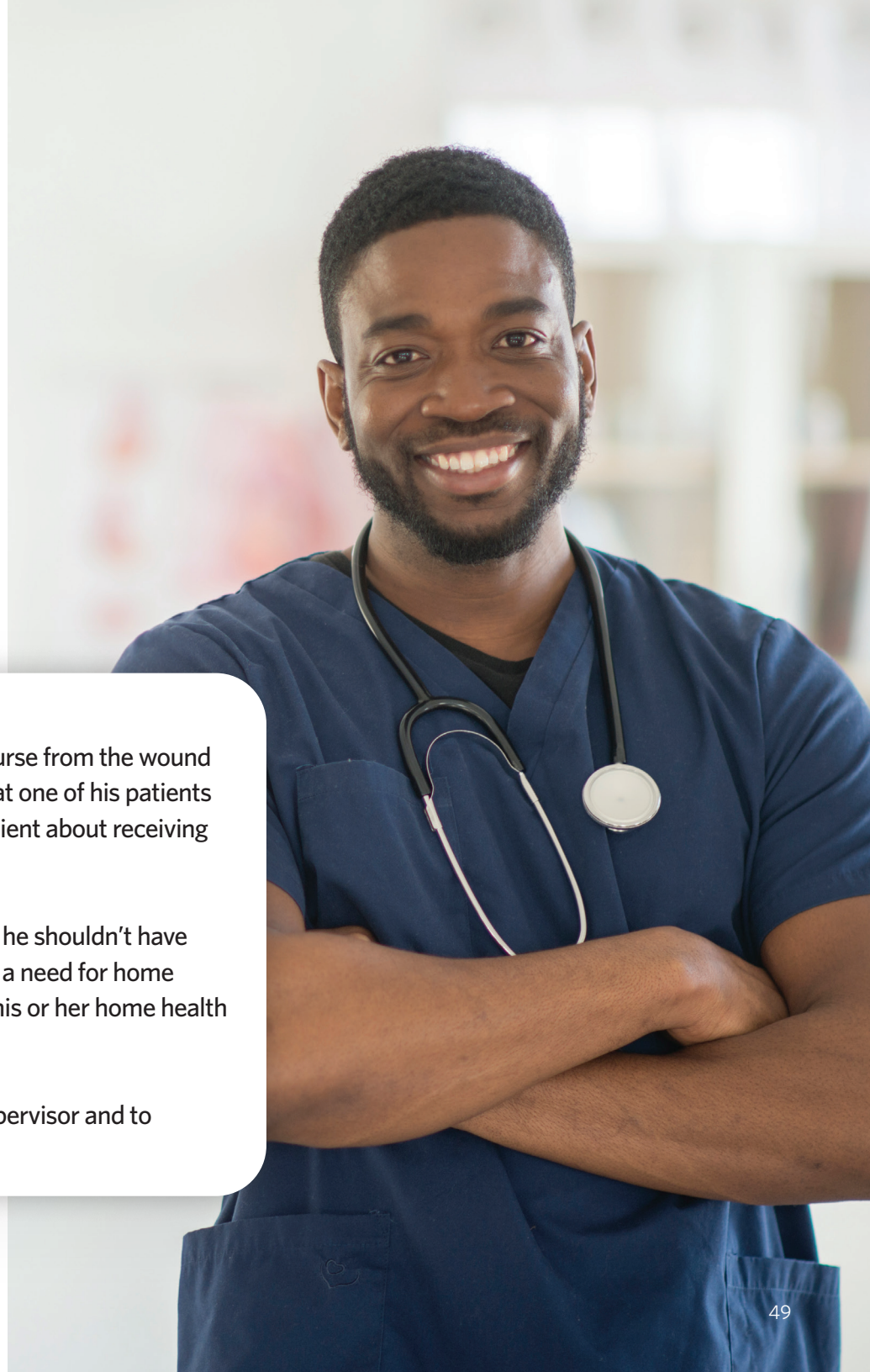
- Improper personal benefits we gain from working at Ardent
- Business opportunities
- Loans to employees or their families
- Business arrangements with Ardent
- Business relationships with family members
- Employer/employee relationships
- Outside employment with a competitor
- Personal investments with competitors, customers or suppliers
- Charitable activities or connections to government officials
- Payments from pharmaceutical, medical device or other healthcare companies

One Person. One Moment. One Decision.

Kelley, an ICU nurse and an owner of a home health agency, hires Tom, a nurse from the wound care department. While providing inpatient services, Tom begins to feel that one of his patients could benefit from home healthcare. But he knows that if he talks to his patient about receiving care through his new employer, it could create a conflict of interest.

Tom discusses the situation with the compliance officer. He is advised that he shouldn't have a discussion with the patient, since a physician should determine if there is a need for home healthcare. If there is a need, case management will ask the patient about his or her home health agency of choice.

Going forward, both Kelley and Tom must disclose their conflict to their supervisor and to Compliance to determine if it is manageable.



Learn more:

- CD014 Conflict of Interest Policy-CD-Corp

We Follow Company Guidelines For Giving and Receiving Gifts, Meals, Travel and Entertainment

We should never offer or accept inappropriate gifts and entertainment to influence business decisions.

Why It Matters

Gifts can affect — or give the appearance of affecting — objectivity. However, we recognize that gifts are a common business practice, and that in certain settings, exchanging hospitality and gifts can build goodwill and strengthen business relationships. We follow appropriate gift guidelines that make sure our actions always appear above board and honorable.

How We Care

Any gift we provide must:

- Be for a proper business purpose
- Be legal and accurately documented
- Be permitted by Ardent policies
- Be permitted by the recipient's policies
- Be reasonable in value and appropriate under the circumstances
- Not be cash, gift certificates or other cash equivalents (exception listed in gift chart)
- Not be intended to secure an improper advantage or otherwise influence the recipient inappropriately

To avoid even the appearance of improper conduct, we should:

- Never ask for gifts
- Never accept cash, gift cards or cash equivalents (exception listed in gift chart)
- Only accept gifts or hospitality that are low in value and given on an infrequent basis
- Never accept any gifts or inappropriate hospitality from vendors if we are a member of the team evaluating a procurement in which the vendor is competing
- Never accept loans, except for loans at market rates from financial institutions made in the ordinary course of business, from any counter-party or entity that has an interest in Ardent

Questions about giving or receiving gifts can be directed to Compliance or the Ethics Line.

GIFT SUMMARY CHART **Assuming the offer of a gift meets the restrictions discussed in this section.**	
$300	Maximum total of gifts you can receive in a year from one person/ entity without further approval. Any gifts exceeding that amount must be approved by BOTH your supervisor and your facility's CEO
$100	Maximum amount of a gift you can accept without further approval. If any single gift has a face value more than $100, it has to be approved by BOTH your supervisor and your facility's CEO
$50	A reasonable and acceptable amount of a gift card you can receive for a holiday or birthday or similar special event
$15	The maximum value of any gift you give to or receive from a patient
$0	Generally speaking, no gifts to or from government representatives

Gifts to or from Patients

Despite the bond that can develop with patients, any exchange of gifts can create the appearance of favoritism or improper incentive.

Gifts to and from patients are generally forbidden but on an exceptional basis may be acceptable if they are:

- Small in value and no cash or cash equivalent (generally, less than $15)
- Homemade or perishable, such as flowers or cookies
- Consistent with the patient's clinical care
- Part of occasional patient celebrations that include everyone, such as a holiday party

Gifts to or from Healthcare Providers and Physicians

Gifts exchanged with healthcare providers and physicians are generally prohibited. We would never want to give the impression that a provider has special access to our facilities or preferential treatment because he or she gave us a gift.

There are some exceptions. For more information, please review our Provider Relationships Policy and consult with Legal or Compliance before accepting any gift.

Gifts to physicians or their immediate family members are subject to strict requirements under the Stark Law. They must be tracked in the physician gift log maintained at each facility and discussed with the compliance officer or operations legal counsel.

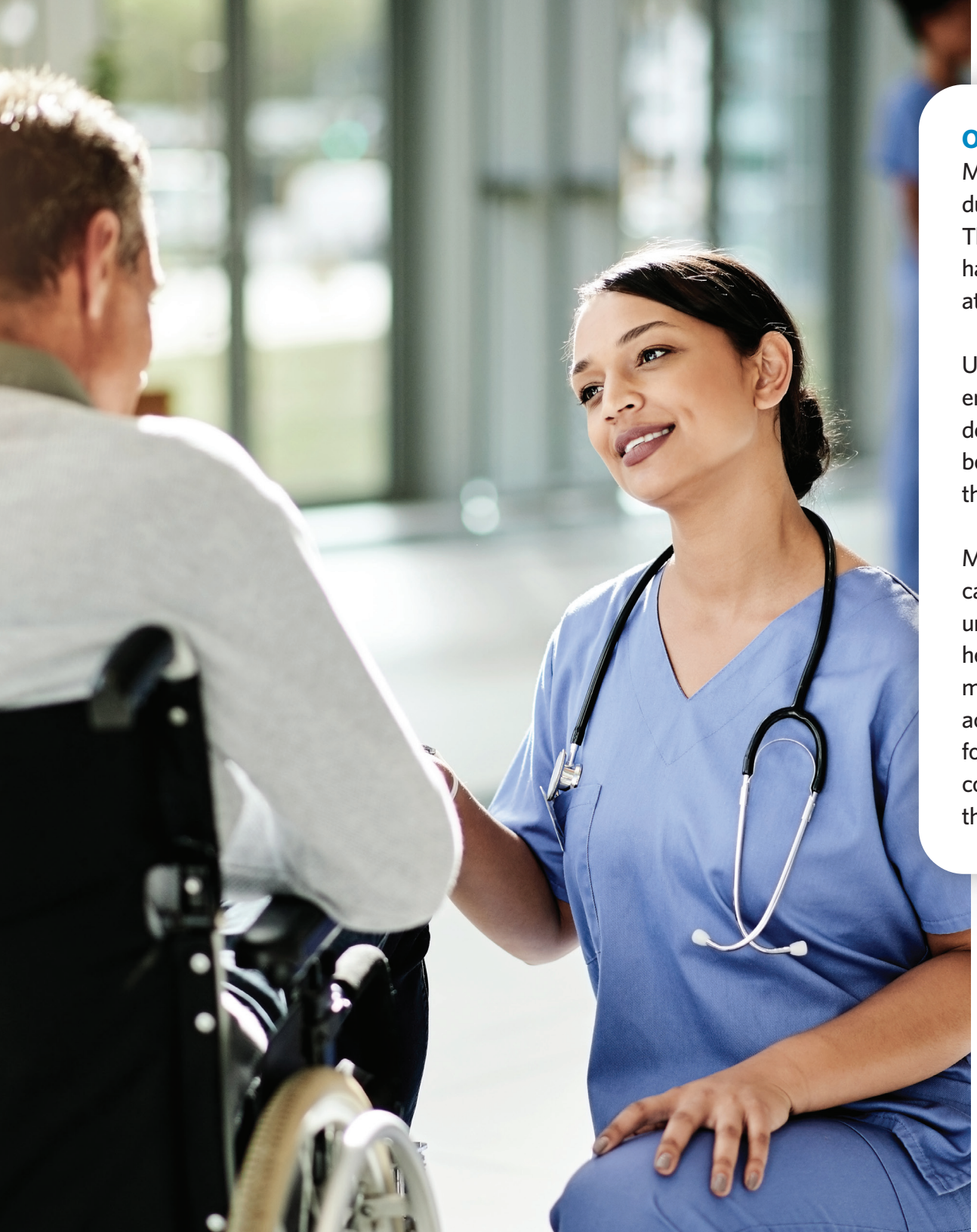
Gifts from Pharmaceutical Companies and Medical Device Manufacturers

Medical suppliers are important partners in our healthcare services. Many of these companies also offer educational and research opportunities that could benefit us.

These vendors should follow the principles spelled out in The Pharmaceutical Research and Manufacturers Code on Interactions with Health Care Professionals or the Advanced Medical Technology Association Code of Ethics.

Government Employees and Agencies

Complex rules apply to the giving of gifts, entertainment and other business courtesies to government officials, including employees of state-owned organizations. What may be permissible for commercial customers may be illegal when dealing with the government. Employees, officers and directors are prohibited from providing gifts, meals or anything of value to government officials or employees or members of their families without the prior written approval of Ardent's Chief Compliance Officer or General Counsel.



One Person. One Moment. One Decision.

Michelle, an ICU nurse, has been caring for a patient during the patient's four-week admission to the hospital. Throughout the patient's stay, the patient and her family have expressed their sincere appreciation for the care and attention Michelle has provided her.

Upon discharge, the patient's family hands Michelle an envelope. Michelle puts the envelope in her pocket and doesn't open it until the end of her shift, after the patient has been discharged. The envelope contains $300 in cash with a thank-you note for the services provided to the patient.

Michelle knows the Code gives guidance regarding offers of cash or cash equivalent gifts from patients. She understands she cannot accept the money. She brings it to her manager, who writes a letter to the patient returning the money and explaining that employees are prohibited from accepting such gifts. The manager expresses appreciation for recognizing the employee's service. The manager also commends Michelle for "doing the right thing" and reporting the gift.

Learn more:

- CD004 Entertainment and Gifts-CD-Corp
- CD006 Approval of Gifts in Recognition of Volunteer Efforts-CD-Corp



We Care About Our Data

As a growing healthcare organization, we rely on technology to drive innovation and care for patients and our team members. Secure data is the foundation for these efforts. At Ardent, it is everyone's responsibility to ensure we have a secure IT environment. From preventing phishing attacks to ensuring only authorized users access our systems, it's up to each of us to protect our data.

We Protect Company Resources

We protect the physical, financial and technological resources that belong to Ardent.

Why It Matters

Our company resources enable us to execute our strategies and provide high-quality care. It's not enough to have these resources; we have to use them well. Theft, carelessness and waste have a direct impact on Ardent's profitability.

How We Care

We each have a duty to protect Ardent's assets and ensure their efficient use. We use our information and communications technology responsibly by:

- Taking all reasonable steps to ensure that company assets are not damaged, abused, wasted, lost or stolen
- Always handling company funds honestly, responsibly and in accordance with Ardent policies
- Never removing company-owned property from Ardent facilities for personal use
- Ensuring that only authorized users have access to Ardent's computers and network services
- Protecting our user IDs and passwords, changing them regularly and never sharing them or security credentials with others
- Protecting or encrypting information considered sensitive or vulnerable before sending the information
- Keeping computer equipment safe and secure at all times
- Never trying to work around IT security policies and controls
- Promptly reporting any abuse or misuse of company assets to Human Resources, Compliance or the Ethics Line

To further protect these resources, Ardent reserves the right to monitor their use and to monitor all communications on company-owned systems.

Learn more:

- Table of Contents for HIPAA Security Policies & Procedures

Electronic Resources

Ardent provides resources such as computers, phones, and other physical assets to enable us to conduct business. While we are permitted limited personal use of these assets, such personal use should not detract from the performance of our duties or violate any company policy or applicable law.

We must not use these resources to improperly disclose or misuse Ardent's confidential information, conduct illegal activities, access, or download obscene or sexually explicit material, or communicate discriminatory, harassing, or threatening messages. We have no expectation of personal privacy in connection with the use of Ardent resources unless otherwise permitted by law. Ardent reserves all rights, to the fullest extent permitted by applicable law, to monitor and review any messages, internet browsing history and other information sent, received, or viewed using Ardent resources.

We should:

- Keep personal data secure and confidential at all times
- Maintain accuracy of personal data
- Only collect data that is relevant to the purpose for which it is collected

We should not:

- Share personal data with anyone who does not have a relevant and legitimate business responsibility related to the data
- Retain personal data longer than necessary to complete business objectives or meet legal requirements
- Transfer data outside the country in which it was collected without guidance from Compliance (supervised by the General Counsel unless another person has been designated by the Board)



We Safeguard Company Information

Ardent takes every measure possible to ensure the privacy and security of confidential and proprietary information.

Why It Matters

Every day, we manage an enormous amount of data. Our continued success requires that we protect this data and use it wisely. Protecting the privacy of patient information and other medical data is part of how we care for one another.

How We Care

Confidential information includes confidential financial data, business secrets and other nonpublic proprietary information about Ardent. It also includes confidential information regarding Ardent's business partners, vendors and patients.

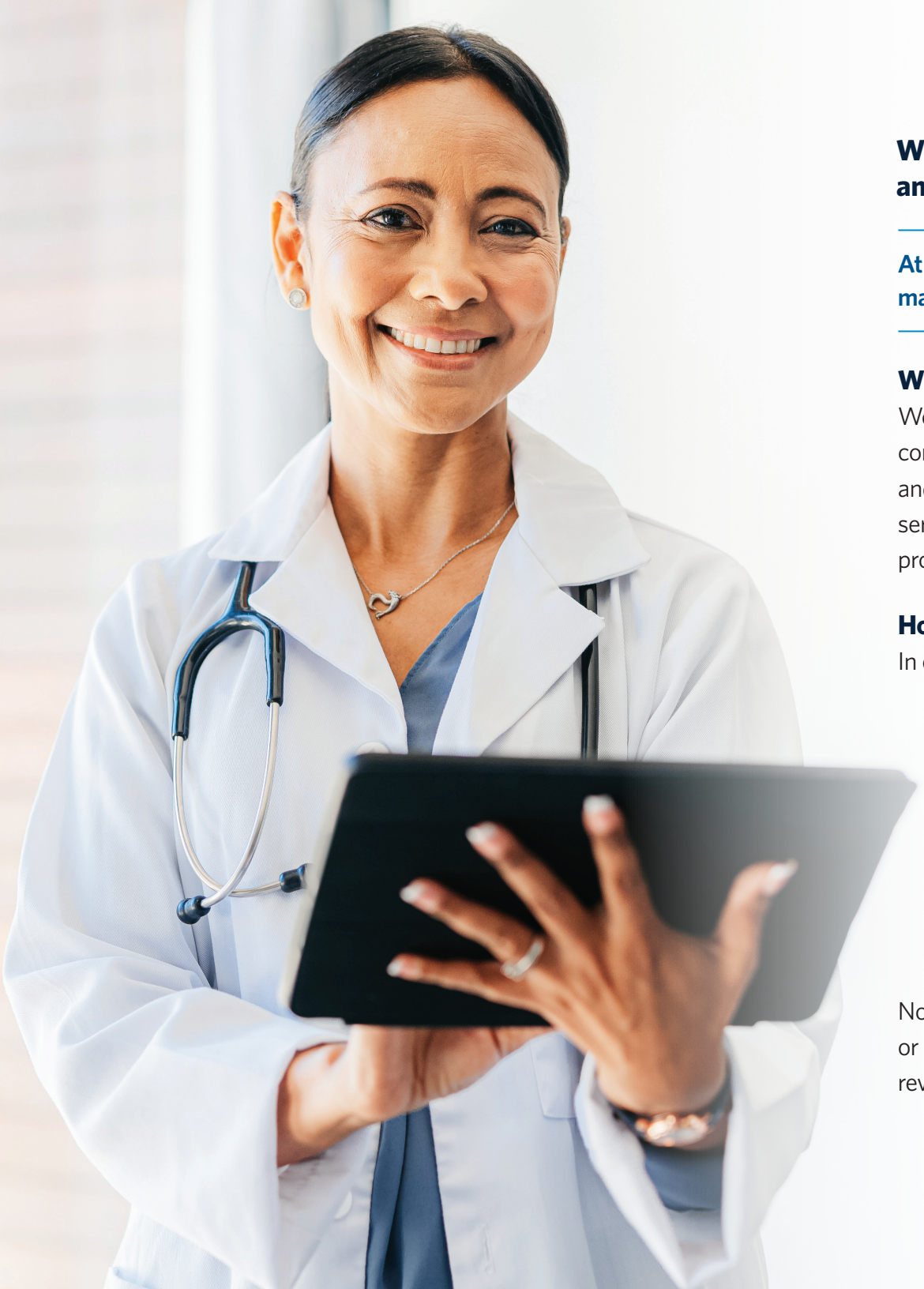
In order to protect confidential information, we should:

- Never use the information for our personal benefit or the personal benefit of persons inside or outside Ardent
- Carefully guard against disclosure of the information to people outside Ardent
- Never discuss confidential information in public places, such as planes, elevators or restaurants
- Discuss confidential information only with authorized personnel and only as necessary to carry out business responsibilities
- Make sure to use Ardent systems that are approved by Ardent IT Security for all confidential communications
- Follow all confidentiality agreements — and reach out to Ardent's general counsel if a legitimate need to disclose confidential information arises



We Care About Our Communities

Ardent takes pride in being a strong partner to each of the communities we serve. Our Code of Conduct reminds us that our responsibility to operate in a responsible, ethical and sustainable way extends beyond the walls of our healthcare facilities and into our communities. By providing clear direction on a range of situations, we can be confident our desire to make a difference is channeled in responsible and legal ways.



We Are Honest In Our Marketing and Advertising

At Ardent, we portray ourselves with honesty and integrity in all marketing and advertising.

Why It Matters

We work hard to help the public understand our commitment to communities, our partnerships with talented healthcare providers and staff, our compassion for patients and the quality of our services. Honest advertising and marketing help us protect and promote that image.

How We Care

In our marketing and advertising materials, we:

- Support any claims of quality with facts
- State our services clearly as to avoid confusion
- Respect our competition by never degrading or defaming other healthcare providers
- Accurately reflect the true charge for our services when relevant
- Receive approval from Marketing
- Follow all state and federal advertising laws

No advertising or promotional material may use the Ardent logo, or a hospital, pharmacy, physician practice or clinic logo, without a review by Marketing and/or Corporate Communications.

We Use Social Media Responsibly

We embrace the power of social media to build connections and express our points of view, but suggest being thoughtful before sharing any Ardent-related information.

Why It Matters

Social media is a powerful tool that helps people connect and allows our company to interact with and educate our communities. However, social media can also create risks and negative impacts. Every communication on behalf of Ardent has the potential to benefit or harm our reputation.

How We Care

Social media communications on behalf of Ardent should be handled by those with the necessary training. Posts should be thoughtfully prepared and vetted.

When using social media, we should make sure to:

- Use social media time responsibly so that it doesn't interfere with work commitments
- Clearly distinguish between personal posts and those officially authorized by Ardent
- Not engage in personal posts that reflect negatively on Ardent
- Identify ourselves as Ardent employees if authorized to endorse our company, products or services

We should never:

- Speak on behalf of Ardent if not authorized to do so
- Post photos of patients or any information regarding patients, even if we don't use the patient's name
- Post any photos of working areas that may capture confidential information in the background, because even if unintentional, this may be a HIPAA violation
- Disclose confidential or proprietary information of Ardent, our business partners or our competitors
- Make obscene or defamatory statements

Learn more:

- Social Media and Internet Posting Policy-CO-Corp

We Do Not Speak On Behalf Of The Company Unless Authorized

At Ardent, we speak with one voice when communicating with the media, financial analysts, investors and the general public.

Why It Matters

To keep the information we present consistent, accurate and complete, certain designated colleagues are specially trained and authorized to speak on behalf of Ardent. By directing all media inquiries to these colleagues, we prevent misinformation or errors from being released to the public.

How We Care

Employees, officers and directors who are not official spokespersons for Ardent may not speak as a representative of Ardent with the press, securities analysts, other members of the financial community, stockholders or other groups.

If we are contacted with questions or requests from outside Ardent and are not authorized to respond to them on behalf of Ardent, we protect our reputation by:

- Responding politely and professionally that we are not authorized to assist, but will put the person in touch with someone who can
- Forwarding the contact's information to a communications officer
- Never divulging confidential information about Ardent or our customers, business partners or competitors

Responding to Inquiries about Securities-Related or Financial Information

Ardent has designated the Chief Executive Officer, the Chief Financial Officer, the President of Hospital Operations, Executive Vice President, General Counsel and Secretary, and the Vice President of Investor Relations as the sole authorized spokespersons for Ardent. Requests for financial or other information about Ardent from the media, the press, the financial community, stockholders or the public should be referred to one or more of these authorized spokespersonsor communications. Requests for information from regulators or the government should be referred to Ardent's general counsel.

We Contribute To Our Communities

We are committed to supporting the communities where we live and work.

Why It Matters

As providers of healthcare, we are an integral part of those communities. We accept this responsibility and are committed to giving back.

How We Care

Everything from our admission process to our public policy efforts is designed to serve the communities we call home. Many of our facilities benefit from dedicated volunteers who donate their time and help optimize our patient care. Likewise, many of our employees contribute countless hours of service to the organizations of their choice. We encourage these efforts and consider all our community interactions an important part of the services we provide.

When contributing to our communities, we should:

- Obtain proper approval before donating Ardent funds or making contributions in Ardent's name
- Ensure outside activities do not interfere with our job performance or create a conflict of interest
- Never pressure others to contribute to charitable organizations

One Person. One Moment. One Decision. Diane, a hospital employee, volunteers her time working with a local charity. The charity needs office supplies. Diane knows that the hospital is responsive to requests from charity organizations, so she asks her manager if she can put together a box of hospital office supplies for donation.

The manager denies Diane's request. She explains that the organization appreciates employees' commitment to give back to the community, but charitable contributions with company assets or while on company time must be approved by the CEO. The manager suggests that they talk to the CEO about sponsoring a fundraising event to benefit the charity or other possible charitable opportunities.

After talking to the CEO, Diane and her manager are able to organize an event to raise funds for the charity. One hundred percent of the proceeds will go to the charity, consistent with the Code.



We Protect The Environment

At Ardent, we are required to follow all environmental regulations and take responsibility for minimizing the environmental impact of our operations.

Why It Matters

Our facilities and activities have an inherent impact on the environment. In addition, our work often involves biomedical waste that can be hazardous if not handled appropriately. Each of us has a role to play in maintaining our commitment to environmental responsibility and safety.

How We Care

We can contribute to sustainable practices by:

- Recycling materials like paper, plastic and aluminum
- Reducing our usage of water, electricity and other supplies when possible — small steps add up over time
- Rethinking purchasing and other business decisions with environmentally friendly options in mind
- Reporting any improper procedures, hazardous spills or other environmental concerns to our supervisor or Facilities Management

Medical Hazardous Waste

We are required to adhere to all regulations regarding the transportation, management, storage and disposal of hazardous biomedical waste. This includes solid waste as well as blood, body fluids, tissues, organs and microbiological and pathological waste. We must always apply the proper handling techniques when in contact with these materials.

We Participate in The Political Process

We encourage active participation in the political process, which can make a positive difference in our lives and our communities.

Why It Matters

We all have the right—and the responsibility—to participate in the political process. Active political participation makes for a fairer and more productive society. Ardent supports every employee's right to express his or her beliefs and engage in the political process.

How We Care

When participating in the political process, we should:

- Always follow local and national laws regarding political contributions
- Never use our time on the job for our personal political activities
- Never promote or raise funds for a political cause or candidate on company property
- Never make contributions on Ardent's behalf or using Ardent's resources
- Ask Ardent's Chief Compliance Officer or General Counsel if we are unsure

The Company's Role

As a company, we exercise our political voice through the Ardent Legacy Holdings, LLC Good Government Fund. This separate entity is a political action committee (PAC) that focuses on policy issues that impact healthcare and our hospitals, clinics and healthcare providers. The Good Government Fund abides by all federal and state regulations concerning PACs.

Political Contributions

Payments of corporate funds to any political party, candidate or campaign may be made only if permitted under applicable law and approved in writing in advance by the General Counsel. Payments of corporate funds to any charitable organization or cause may be made only if approved in advance by the General Counsel.

One Person. One Moment. One Decision.

Susan, the marketing director, is excited about a particular candidate in the upcoming mayoral race. She has volunteered her time to help create signs, banners, bumper stickers and other items for the candidate. She is very proud of her work.

Susan wants to inform her colleagues about her work with the campaign, including why they should support the candidate and how to do so. Susan brings some campaign yard signs and bumper stickers to work. She wants to pass them out to her coworkers and tell them how they can donate money or time to the campaign.

The human resources director walks by Susan's office that morning and notices the campaign materials. The director reminds Susan that the Code prohibits an employee from promoting a political candidate, cause, committee or party on company time and property. Susan thanks the human resources director for the reminder and puts the campaign materials in her car in order to comply with the Code.

Learn more:

- CD021 Political Contributions and Activities-CD-Corp

Lobbying Activities

Laws of some jurisdictions require registration and reporting by anyone who engages in a lobbying activity. Generally, lobbying includes:

(1) communicating with any member or employee of a legislative branch of government for the purpose of influencing legislation;
(2) communicating with certain government officials for the purpose of influencing government action; or
(3) engaging in research or other activities to support or prepare for such communication.

So that Ardent may comply with lobbying laws, employees, officers, and directors must notify Ardent's General Counsel or Chief Compliance Officer before engaging in any activity on behalf of Ardent that might be considered "lobbying" as described above.



We Do the Right Thing

This Code reflects the kind of organization we choose to be. At Ardent Health, doing what's right isn't just a policy—it's part of how we care for one another and for the people who trust us with their health. Everyone who works with or on behalf of Ardent shares the responsibility to act with integrity, follow the law and speak up when something doesn't feel right.

We are committed to fostering a workplace where people feel respected, included and safe. That means treating one another with dignity, preventing harassment, and following safety and substance use standards that protect our teams and our patients. Caring for patients also means protecting their privacy, honoring their rights and delivering the highest quality care—every time.

Integrity is essential in every part of our work. Accurate records, truthful billing, responsible use of resources and transparency around potential conflicts help us maintain the trust placed in us. Our Compliance Program supports this commitment through training, audits and fair, consistent investigations.

When expectations aren't met, corrective action may follow. Ultimately, this Code is our shared commitment to making thoughtful, responsible choices—one person, one moment and one decision at a time.

Resources

Toll-Free, 24/7 Ethics Line: (800) 633-2939
Or access the secured website: ArdentHealth.EthicsPoint.com

RADAR is available for employees to submit a potential HIPAA incident.

Ardent's Compliance Team

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One Person. One Moment. One Decision.



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