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	<b>Effective Date:</b> 08/23/24
<b>Policy Title:</b> Anti-Bribery and Anti-Corruption Compliance (AD 2.26)	<b>Previous Versions:</b> 04/30/20; 01/01/12; 10/01/96
	<b>Approved By:</b> Executive Leadership Team
	<b>Approval Date:</b> 08/21/24

## I. Scope

This policy applies to Tenet Healthcare Corporation and its subsidiaries and affiliates other than Conifer Holdings Inc. and its direct and indirect subsidiaries (each, an “Affiliate”), any other entity or organization in which Tenet or an Affiliate owns a direct or indirect equity interest of greater than 50%, and any entity in which an Affiliate either manages or controls the day-to-day operations of the entity (each, a “Tenet Entity”) (collectively, “Tenet”).

## II. Purpose

To promote compliance with the anti-corruption and anti-bribery laws that apply to Company operations, including without limitation the U.S. Foreign Corrupt Practices Act (“FCPA”) and all other applicable anti-corruption and anti-bribery laws wherever Tenet conducts business. This policy prohibits any payment or offer or authorization of payment or Anything of Value to a Foreign Official for the purpose of corruptly influencing that official to assist in obtaining or retaining business or directing business to any person or company. Tenet has established this policy to ensure that all employees are aware of the FCPA and engage in ethical and lawful business practices. This policy is focused on the FCPA because of its broad application; however, it is Tenet’s policy to comply with all applicable U.S. and non-U.S. anti-bribery and anti-corruption laws. In this regard, employees should be aware that certain countries’ laws are broader than the FCPA, in that they prohibit the bribery of any person, not just a Foreign Official as in FCPA.

## III. Definitions

**Anything of Value:** (also referred to as a ‘**Thing of Value**’) Means anything that could benefit the recipient. Examples can include, but are not limited to: Cash; Stock or stock equivalents, such as options or warrants; Gift cards, vouchers or things similar to cash; Gifts; Loans; Services; Use of company facilities, equipment or property; Entertainment, event tickets, golf; Meals, drinks or other hospitality; Payments or reimbursements of travel expenses, lodging, or vacation; Offers of employment, whether to the recipient or a Family Member; Discounts, rebates, or free-of-charge goods; and Charitable or political donations.

**Family Member:** Means, but is not limited to, husband or wife; 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 or grandchild; and spouse of a grandparent or grandchild.

**Foreign Country:** Means any country other than the United States.

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**Foreign Official:** Means any individual employed by, or acting on behalf of, the government of a Foreign Country, 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.). 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. Additional examples of persons who should be treated as Foreign Officials under this policy include, but are not limited to:

- 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 any Foreign Country;
- Customs, tax, and licensing officials; and
- Political parties and political party officials of a Foreign Country (even if they do not hold public office), and any candidate for public office in a Foreign Country.

If you are unsure or do not know whether an individual 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 Tenet until you have confirmed that the individual is not a Foreign Official.

## IV. Policy

All Tenet officers, employees, and agents are required to comply with this policy. No person covered by this policy may give, offer, or authorize giving Anything of Value to a Foreign Official or the Family Member of a Foreign Official, or to any other person while knowing that all or a portion of the Thing of Value will be offered, given, or promised, directly or indirectly, to a Foreign Official or a Family Member of a Foreign Official for the purpose of corruptly influencing such official or inducing him or her to affect any government act or decision in a manner that will assist Tenet or any of its subsidiaries or business units in obtaining or retaining business or any other improper business advantage.

Anti-bribery and anti-corruption compliance is not always black and white. Determining when a gift, payment, or business expense is permissible under this policy may involve difficult legal questions. If you have any question whether a gift, payment, or business expense is permissible under this policy, you are required to contact your assigned Operations Attorney and/or Compliance Officer.

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Furthermore, every Tenet employee, agent or affiliate is obligated by this policy and U.S. law to keep books, records, and accounts that accurately and fairly reflect all transactions undertaken on behalf of Tenet. Such records shall be maintained through submission of expense reports in accordance with Tenet Policy AD 2.08 Travel and Other Business Expenses (in the case of employees) or with requirements of the applicable contract (in the case of contracted agents or affiliates).

Tenet has zero tolerance when it comes to bribery and corruption. As such, any person who fails to comply with all applicable laws and regulations, and this policy, may be subject to disciplinary action up to and including termination of employment in accordance with Tenet’s Human Resources policies and procedures.

Further, this Policy applies to all agents and affiliates of Tenet or any other third party engaged by Tenet who interacts or may interact with Foreign Officials, or otherwise transacts business as it pertains to Tenet operations in a Foreign Country. It is the agent or affiliate’s responsibility, working with Tenet, to ensure responsibilities pertaining to anti-corruption, anti-bribery, and FCPA laws are fully understood and executed. These responsibilities must be documented in any contract executed between Tenet, its subsidiaries or affiliates and any third party.

## V. Procedure

### A. General Prohibition

1. Tenet employees, agents and affiliates may not give, offer or authorize, directly, or indirectly through another person, Anything of Value to, or for the benefit of, a Foreign Official.
2. Payments to expedite or secure the performance of a routine governmental action are usually illegal under local law and are strictly prohibited under this policy.
3. Tenet generally discourages the offering, giving and receipt of gifts. The offering, solicitation and receipt of gifts must not give rise to even an appearance of bribery, corruption or improper conduct. Company employees must not request gifts. Gifts may only be accepted in accordance with Company policy.

### B. Record-Keeping and Notification Requirements

Where a Thing of Value is provided, documentation and/or receipts must be maintained substantiating the expenditure. A log of all reported Things of Value shall be maintained as well as a log of any communication requesting permission to offer or provide a Thing of Value.

### C. Third Party Agents or Consultants

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The Company may use third parties, including advisors, agents, consultants, and other intermediaries, to interface with governmental counterparties, government-owned facilities, and/or regulators, and for other aspects of the Company’s business. Tenet must actively monitor relationships to ensure that third parties conduct business in an ethical manner and adhere to the principles underlying this Policy and all relevant anti-corruption laws and regulations.

**D. Training Requirements**

All employees and contractors who perform a role-based job function related to international patient engagements will receive anti-corruption and anti-bribery training. Documentation regarding this training is maintained in Tenet’s learning management system. Ad-hoc training material related to this policy must be approved by the Chief Compliance Officer (CCO). The names of individuals who receive ad-hoc training must be documented and the training material archived.

**E. Charitable and Political Donations**

Charitable and political donations shall only occur in accordance with applicable Tenet policies and the Code of Conduct.

**F. Government-Owned Businesses**

In many countries it is a common practice for government officials to own or operate business enterprises. While the FCPA and related laws do not prohibit legitimate business relationships with business enterprises owned or controlled by Foreign Officials, great care must be taken to avoid any association with any such enterprise in circumstances that might constitute a potential violation of the FCPA or any other applicable anti-corruption law. The CCO and General Counsel, or their designees, must approve, in advance, any engagement with a business enterprise that is owned by one or more government officials or entities.

**G. Receipt of a Thing of Value**

Tenet employees, agents and affiliates are expected to adhere to Tenet’s Code of Conduct if offered Anything of Value from a Foreign Official or any other individual.

## VI. Enforcement

All employees whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be

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subject to appropriate performance management pursuant to all applicable policies and procedures, up to and including termination. Such performance management may also include modification of compensation, including any merit or discretionary compensation awards, as allowed by applicable law.

## VII. References

Code of Conduct

Foreign Corrupt Practices Act

Patriot Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001)

EAC.01.03.PR.01 Anti-Bribery and Anti-Corruption Compliance Procedure