

**COMPLIANCE 17.0                    POLICY ON UHS COMPLIANCE POLICIES**

**Scope:**            All subsidiaries of Universal Health Services, Inc., including facilities, Independence Physician Management, Prominence Health Plan and UHS of Delaware, Inc. and their personnel.

**Purpose:**            To establish duties and responsibilities regarding the drafting, updating, approval, and maintenance of all UHS compliance policies.

**Policy:**            UHS compliance policies are required to be drafted, updated, approved and maintained using the procedure set forth below.

**Procedure:**

The UHS compliance policies shall be drafted by the UHS Compliance Office and/or the UHS Office of General Counsel. Maintenance of UHS compliance policies shall be the responsibility of the UHS Compliance Office. Pursuant to this responsibility, the UHS Compliance Office and/or UHS Office of General Counsel shall update, revise, or draft new UHS compliance policies that may be required due to changes or revisions to existing laws, regulations, or other authorities as needed. UHS compliance policies shall be approved by the UHS Compliance Committee. In situations where it is not practicable to obtain the approval of the UHS Compliance Committee, such as when a policy is being implemented on an urgent basis, the policy may be approved by the UHS CEO and President, Chief Financial Officer or General Counsel. All UHS compliance policies must indicate that the policy has been reviewed and approved.

The UHS Office of General Counsel and/or Chief Compliance Officer may develop and distribute field memoranda for the implementation of certain aspects of the Compliance Program (“Field Memoranda”). These Field Memoranda will have the same force and effect as UHS compliance policies but do not require the review and approval processes set forth above.

The Chief Compliance Officer will retain copies of current and prior UHS compliance policies and the Field Memoranda in accordance with Compliance Policy **12.0 Compliance Document Retention**.

**Revision Dates:**

**11-29-2021; 7-27-2020; 10-12-2017; 10-01-2015; 10-26-2012**

**Implementation Date: 10-21-2010**

**Reviewed and Approved by:**

**UHS Compliance Committee**

