

**Scope:** All subsidiaries of Universal Health Services, Inc., including facilities and UHS of Delaware, Inc. and their personnel.

**Purpose:** Establish the duties and responsibilities of the UHS Compliance Committee.

**Policy:** UHS Compliance Program oversight will be provided by the UHS Compliance Committee and the Chief Compliance Officer. The Compliance Committee and Compliance Officer are vested with the authority to discharge their oversight responsibility as hereafter described:

#### Compliance Committee Composition

The Compliance Committee shall be composed of at least the following individuals:

UHS Chief Compliance Officer  
UHS President  
UHS Chief Financial Officer  
UHS General Counsel  
UHS Controller

Other individuals may be invited to join the committee or participate in Compliance Committee meetings as determined by the Compliance Committee or Compliance Officer to be needed. The Chief Compliance Officer shall be the Chair of the Compliance Committee. In the absence of a Chief Compliance Officer, the UHS General Counsel or his/her designee shall serve as interim Chair of the Compliance Committee and assume all duties and responsibilities of the Chief Compliance Officer.

#### Purpose of the Compliance Committee

The purpose of the Compliance Committee is to oversee the implementation and operation of the Compliance Program. The Compliance Committee will review reports and recommendation of the Compliance Officer regarding Compliance Program activities, including data regarding compliance generated through audit, monitoring, and individual reporting. Based on these reports, the Compliance Committee will make recommendations regarding the effectiveness of the Compliance Program.

#### Duties of the Compliance Committee

The duties of the Compliance Committee shall include, but are not limited to:

1. Overseeing the implementation and operation of the Compliance Program.
2. Receiving and acting upon reports and recommendations from the Compliance Officer.
3. Evaluating the performance and effectiveness of the Compliance Program and making recommendations accordingly.
4. Reviewing and approving Compliance Policies as well as other documents relating to the Compliance Program.
5. Conduct quarterly meetings to receive reports from the Chief Compliance Officer and review the operations of the Compliance Program.

#### Compliance Committee Member Responsibilities

The responsibilities of the Compliance Committee members include the following:

1. Compliance Committee members are expected to demonstrate full commitment to the Compliance Program.
2. Compliance Committee members are expected to be knowledgeable about the Compliance Program and all Compliance Policies.
3. Compliance Committee members are expected to regularly attend the scheduled Compliance Committee meetings and constructively participate.

#### Role of Chief Compliance Officer

The Chief Compliance Officer is responsible for the implementation, administration, and oversight of the Compliance Program, as outlined in Compliance Policy **2.0 Chief Compliance Officer**. As such, the Chief Compliance Officer shall, pursuant to its role as Chair of the Compliance Committee:

1. Prepare an agenda, which may include reviews of previous meetings and matters of new business to be addressed.
2. Prepare and present updates regarding regulatory issues, reports on audit activity and findings, and other matters pertaining to the activities and effectiveness of the Compliance Program.

3. Prepare minutes from Compliance Committee meetings.
4. Maintain the Compliance Committee agendas and meeting minutes in accordance with the requirements of Compliance Policy **12.0 Compliance Document Retention.**

**Revision Dates:**

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

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

**Reviewed and Approved by:**

**UHS Compliance Committee**