

## BJC HealthCare

### BJC HEALTHCARE CORPORATE COMPLIANCE POLICY

**APPLIES TO:** BJC HealthCare Hospitals and Service Organizations

**TITLE:** Policy on Political, Campaign, and Lobbying Activity

**NUMBER:** No. 22

**PURPOSE:** Guidance for BJC and its affiliates to remain politically neutral and not participate or intervene, directly or indirectly, in the campaign of any candidate or political party.

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#### **I. Statement of Policy**

BJC HealthCare (“BJC”) is committed to conducting business in compliance with all applicable laws, regulations, and BJC policies and according to the highest standards of ethical conduct and integrity.

#### **II. Scope of Policy**

This policy applies to all BJC HealthCare (BJC) Hospitals and Service Organizations (“HSO”).

#### **III. Policy**

BJC HealthCare is committed to the open expression and discussion of ideas and opinions. As a tax-exempt organization, BJC and its affiliates are required to remain politically neutral and may not participate or intervene, directly or indirectly, in the campaign of any candidate or political party. Federal and state laws place limitations on BJC and its employees’ political activity, lobbying activity, campaign activity, and other engagement with candidates, elected officials, and their staff.

Because of these restrictions, BJC’s resources may not be used in any way to suggest endorsement of, or support for, a political candidate, nor may BJC resources be used to engage in unapproved lobbying activities. Examples of BJC resources include but are not limited to:

- BJC’s name, logo, or other identifying marks
- Use of BJC e-mail, postal services, office supplies, mailing lists, letterhead, photocopiers, telephones, computers, websites, databases, other information technology

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resources.

- Any space in BJC hospital or HSO facilities.

With the prior written approval of BJC's President or Executive Vice President, candidates, government officials, associated staff, and other political speakers may be invited to speak at BJC facilities. Contact the Government Relations department at 314-286-2147 before extending an invitation or responding to a request to host a candidate, government official or other political speaker.

#### IV. Procedure

##### **Employee Activities**

This policy does not prohibit employees from communicating with their elected representatives or speaking out on political issues as private citizens. Employees must indicate that their comments do not represent those of BJC, and that they are not speaking or acting on behalf of BJC. Though an employee may be identified by their BJC professional title, the employee's association with BJC may be made only for purposes of identification. (e.g. Susan Smith is employed as a nurse at Barnes-Jewish Hospital.)

##### **Support for Candidates, Political Parties, or Petitions**

BJC may not advocate for the election or defeat of a particular candidate or political party or promote or encourage such advocacy by members of the audience at an event held on BJC property.

##### **Political Campaign Activities**

Employees may not conduct campaign activities during the employee's working hours. Employee candidates must comply with applicable federal, state, and municipal election regulations.

An employee-candidate shall not use any BJC resources, services, or personnel for any campaign-related activities. BJC's name may not be mentioned in the solicitation of contributions or other commitments. Employee-candidates must receive written permission to use BJC's name for identification purposes and the employee-candidate shall make clear that BJC is not endorsing the employee-candidate, and that the employee-candidate's views are not those of BJC.

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An employee-candidate may not seek financial contributions or request volunteer campaign assistance from other BJC employees who report, directly or indirectly, to the employee involved in the political activity.

### **Reserving and Utilizing BJC Facilities for Hosting Government Officials, Political Candidates, Voter Education, and Other Related Activities**

BJC facilities may be used for events involving government officials and candidates by requesting prior written approval from the BJC President or Executive Vice President. Such programs may not be held in coordination with any campaign-related event or activity.

BJC locations are often in high demand and constraints and limitations exist that make accommodating certain speakers or events a challenge. Such events often impact the entire facility.

### **Hosting Government Officials and Staff, Candidates and Campaign Representatives, and Other Political Guests**

BJC welcomes speakers representing a diverse range of views, beliefs, and governmental responsibilities. To ensure that BJC is able to accommodate a particular official, candidate, or political campaign representative, employees with such a request should contact the Government Relations department before extending an invitation.

A guest's appearance must not be conducted as a campaign rally or political event. The appearance or presentation shall not be used to distribute campaign material, collect campaign or other political contributions, or solicit commitments from members of the audience.

The Communications Department will coordinate media contact on behalf of BJC and will assist employees and guests with events. A BJC official hosting the event who anticipates or seeks media coverage is responsible for contacting the Communications Department in advance. BJC may allow representatives of the news media to be present during an event or a speaker's appearance, but only if access is permitted in a politically neutral manner. Press conferences and other election-related media events managed by candidates and their campaign staffs are not permitted on BJC premises.

### **BJC Lobbying Activity**

BJC officers, their designees and the Government Relations staff are authorized to make

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lobbying contacts on behalf of BJC. No other BJC employee is so authorized. BJC retains outside lobbyists only through the Government Relations department with the consent of the BJC President, the Executive Vice President, or the General Counsel.

BJC employees are often asked by their professional associations to participate in lobbying activities. It is the employee's responsibility to act only as an individual, or on behalf of a professional association.

#### **V. Responsibility of All BJC Employees**

BJC employees are responsible for being aware of and complying with all applicable policies. Questions or issues regarding the policies shall be directed to the Corporate Compliance Department. In addition, the BJC HealthCare Code of Conduct requires all BJC employees who are professionals to follow the professional ethics required by the individual's licensing body.

#### **VI. Corporate Compliance Department Review, Approval and Assistance**

Any exception, change or deviation from this Policy must be reviewed and approved by the BJC Vice President of Corporate Compliance. The Corporate Compliance Department is available to answer any questions and to provide assistance and advice to BJC employees concerning this Policy. Questions regarding specific terms, situations, or problems may be forwarded to the Corporate Compliance Department for assistance and advice.

RECOMMENDED BY: BJC HealthCare Corporate Compliance Department

EFFECTIVE DATE: August, 2016