

**ARDENT HEALTH PARTNERS, INC.
CORPORATE DISCLOSURE POLICY**

Effective: July 17, 2024

Applicability: This policy is applicable to all employees, officers, and directors of Ardent Health Partners, Inc. and its subsidiaries (together, the “Company”).

Purpose: This policy covers disclosures to the investment community, including brokers, dealers, investment advisers, investment companies, hedge funds, analysts, and any security holders/stockholders, including family and friends, who may buy or sell the Company’s securities on the basis of communicated information (“Covered Persons”). Communications in the ordinary course of business with joint venture partners, providers, payers, patients, vendors, and employees, as well as communications with rating agencies, the government, or persons bound by a duty of confidentiality, are not covered by this policy. If you are in doubt as to whether someone is a Covered Person, then either (i) assume that they are or (ii) contact the Company’s General Counsel for guidance.

Policy Statement

- 1) The Company is committed to providing timely, factual, consistent, transparent, credible, and accurate information to the investment community and avoiding prohibited “selective disclosure” (as defined below) in compliance with legal and regulatory requirements, including Regulation FD (Fair Disclosure) (“Regulation FD”), adopted by the Securities and Exchange Commission (the “SEC”) under the Securities Exchange Act of 1934, as amended, and Regulation G – Conditions for Use of Non-GAAP Financial Measures (“Regulation G”) and the rules of the New York Stock Exchange (the “NYSE”). It is imperative that communication is consistent, that selective disclosure is avoided at all times, and that all parties in the investment community have fair access to information. Pursuant to Regulation FD, “selective disclosure” is generally the disclosure of material nonpublic information to Covered Persons prior to the broad public dissemination of that information. This policy (i) prohibits the selective disclosure of material nonpublic information about the Company in violation of Regulation FD and (ii) sets forth procedures to prevent such improper selective disclosures. Failure to comply with these procedures may result in significant liability for the Company and, in some instances, certain directors, officers, employees, and independent contractors.
 - a) This policy should be read in conjunction with the Company’s Insider Trading and Confidentiality Policy regarding transactions in Company securities, which, among other things, restricts under certain circumstances the use and disclosure of information regarding the Company and its operations by Company directors and personnel. Any questions regarding this policy, or its application to particular circumstances, should be raised with a member of the Company’s Disclosure

Committee, the General Counsel, or an appropriate person designated by the Disclosure Committee or the General Counsel.

- b) Examples of activities affected by this policy include, but are not limited to:
 - i) earnings releases and related conference calls;
 - ii) speeches, interviews, and conferences;
 - iii) responding to market rumors;
 - iv) commenting on analyst reports on the Company;
 - v) referring to or distributing analyst reports on the Company;
 - vi) analyst and investor visits;
 - vii) postings on the Company's websites; and
 - viii) social media communications, including through corporate blogs, employee blogs, chat boards, Twitter, Facebook, LinkedIn, YouTube, and any other non-traditional and/or electronic means of communication.

Material Nonpublic Information and Confidentiality

- 1) There is no bright-line test as to what constitutes "material information," and the SEC has rejected the use of quantitative tests (*e.g.*, 5% of revenue, earnings, or assets) as the sole determinant of materiality. Nevertheless, information is generally considered to be material information if it is information, whether quantitative or qualitative, that (i) is likely to have an impact on the price of the Company's securities, or (ii) reasonable investors would want to know before making an investment decision with respect to the Company's securities. Both positive and negative information, as well as forecasts regarding whether an event may or may not occur, and guidance may constitute material information. Because materiality requires specialized judgment, any questions concerning whether information is material information should be directed to the General Counsel or his or her designee. Material information concerning the Company (including information relating to its subsidiaries or affiliates) may include, but is not limited to, the following:
 - a) earnings information and quarterly or annual results;
 - b) guidance/projections/statements regarding earnings, sales and/or profit estimates or information;
 - c) financial and operating metrics (on a consolidated or "same-facility" basis or both), including earnings per share, revenue, profits, losses, changes in assets, hospitals operated, licensed beds, utilization of licensed beds, employed physicians, patient admissions, emergency room visits and surgeries information;
 - d) proposed significant mergers, acquisitions, tender offers, joint ventures, or other strategic matters;
 - e) sales of significant assets or a significant subsidiary;
 - f) launches of significant new business lines;
 - g) significant developments relating to joint venture partners, providers, payers, and vendors, including the gain, loss or bankruptcy of a substantial joint venture partner,

- provider, payer, or vendor (or the acquisition or loss of a contract with any of the foregoing);
- h) changes in control or changes in the board of directors or senior management of the Company;
 - i) changes in auditors or auditor notification that the Company may no longer rely on an audit report;
 - j) financings and other events regarding the Company's stock or other securities, including stock dividends, stock splits, stock repurchases, defaults on debt securities, calls of securities for redemption, changes in the rights of security holders, or public or private sales of additional securities;
 - k) significant litigation, investigations, or tax disputes;
 - l) bankruptcy, corporate restructurings, or receivership;
 - m) a major cybersecurity incident;
 - n) significant actions of regulatory agencies;
 - o) changes in compensation policy; and
 - p) changes in regulation and reimbursement rates and analysis of how such changes may affect the Company.
- 2) Whether a particular event or fact constitutes material nonpublic information will depend on the surrounding circumstances and must be decided on a case-by-case basis. Material information is "nonpublic" if it has not been disseminated in a manner making it available to investors generally (*e.g.*, SEC filings, press releases or publicly accessible conference calls). You should assume that all information that has not been disclosed for at least 24 hours pursuant to one of the procedures set forth in this policy is still "nonpublic." If you are uncertain as to whether any particular information should be considered "nonpublic," contact the General Counsel.
- 3) Maintaining confidentiality of material information that is nonpublic is essential to the Company, both from a legal and competitive standpoint. Material, confidential, and other sensitive information must be carefully handled in order to avoid disclosure that could violate law or cause competitive harm to the Company. Directors, officers, employees, and independent contractors are prohibited from discussing material nonpublic information with anyone outside the Company (including family members and friends) except as permitted by this policy and in accordance with the Company's Code of Business Conduct and Ethics, Insider Trading and Confidentiality Policy, and other applicable policies.
- 4) All officers, directors, and employees shall take all steps and precautions necessary to restrict access to, and secure, material nonpublic information by, among other things:
- a) maintaining the confidentiality of Company-related transactions;
 - b) exercising caution when emailing confidential information. Confidential information should not be emailed to others not authorized to receive such information, to personal emails, or to non-Company emails except those business associates entitled to receive such information, *e.g.*, the Company's external auditor or legal counsel;

- c) conducting their business and social activities so as not to risk inadvertent disclosure of confidential information;
- d) promptly removing and cleaning up all confidential documents and other materials from conference rooms following the conclusion of any meetings;
- e) disposing of all confidential documents and other papers, after there is no longer any business or other legally required need, through shredders when appropriate;
- f) safeguarding laptop computers, mobile devices, tablets, memory sticks, CDs, and other items that contain confidential information; and
- g) avoiding the discussion of material nonpublic information in places public or quasi-public where the information could be overheard by others such as in elevators, restrooms, hallways, restaurants, airplanes, or other public transportation.

Communication of Material Nonpublic Information Within the Company: Individuals within the Company whose role/job function provides them with access to consolidated financial or statistical information, shall not share, communicate, or give access to such information to anyone *within the Company* whose role/job function does not give them such access. Access to consolidated financial information is only granted by the Chief Accounting Officer and by the Audit and Compliance Committee (“Audit Committee”) or its authorized designees in the event of an Audit Committee investigation. Such information can only be shared on a need-to-know basis in the ordinary course of business. Care should be taken when emailing or forwarding emails within the Company that contain consolidated financial information to prevent inadvertent disclosure.

Regulation FD

- 1) Regulation FD requires that whenever the Company, or a person acting on behalf of the Company, discloses material nonpublic information to any Covered Person, the Company must disseminate the same information to the public:
 - a) Simultaneously (for intentional disclosures); or
 - b) Promptly (for non-intentional disclosures).
- 2) Public disclosure of such material nonpublic information may be made either through the issuance of a press release, the filing or “furnishing” of a report on Form 8-K or through another Regulation FD compliant method. If public disclosure is to be made through a conference call and/or webcast, the conference call and/or webcast must be preceded by adequate advance notice of (at least 48 hours prior to the time of) the conference call and/or webcast, including the means of accessing it.
- 3) Regulation FD specifically prohibits selective disclosure to any of the following Covered Persons:
 - a) brokers, dealers, and persons associated with them, including analysts;
 - b) investment advisers, certain institutional investment managers and their associated persons;

- c) investment companies and affiliated persons; and
 - d) holders of any of the Company's securities, including family and friends, under circumstances in which it is reasonably foreseeable that the security holders would purchase or sell securities on the basis of the information.
- 4) If you are in doubt as to whether someone is a Covered Person, then either (i) assume that they are or (ii) contact the General Counsel for guidance.
 - 5) Regulation FD does not specifically prohibit communications with the following:
 - a) Company employees (even when the employees are stockholders);
 - b) Any person who owes a duty of trust or confidence to the Company through professional responsibility or by contract (e.g., an attorney, accountant, or investment banker); and
 - c) Any person who has entered into an express confidentiality or nondisclosure agreement with the Company (whether written or oral).
 - 6) Although Regulation FD does not specifically prohibit communication with the individuals above, it is the Company's policy to follow Regulation FD guidelines with communication to these individuals/groups as well.
 - 7) Selective Disclosure. It is against the law and Company policy to selectively disclose material nonpublic information to people or groups outside of the Company at any time, unless those people or groups are covered by confidentiality or nondisclosure agreements.
 - 8) Tone, Gestures, Code Words. Authorized Spokespersons (as defined below) should be cognizant of the fact that the disclosure of material information is not limited to express, spoken language. Material information may also be disclosed through tone, emphasis, or demeanor. Furthermore, Regulation FD also covers the use of "code words" or "winks" and "nods" that are used to convey material information.
 - 9) If a director, officer, or employee of the Company learns of information that causes him or her to believe that a disclosure may have been misleading or inaccurate when made or may no longer be true, including forward-looking statements (i.e., one that has a forward intent and connotation upon which parties are expected to rely), such person should report that information immediately to the General Counsel.
 - 10) Any question of what to disclose and with whom to disclose it to should be approved by the General Counsel.

Company's Disclosure Committee

- 1) The Company has established a disclosure committee (the "Disclosure Committee") to oversee and implement the Company's disclosure policy, procedures, and internal controls for the disclosure of material nonpublic information. The Disclosure Committee should be apprised of all material Company developments in order to determine the appropriateness and timing for public release of material nonpublic information or whether, or to what extent, the information should remain confidential.
 - a) The members of the Disclosure Committee are as follows:

- i. Executive Vice President, General Counsel & Secretary (Disclosure Monitor)
- ii. Vice President & Assistant General Counsel
- iii. Chief Compliance Officer
- iv. Chief Accounting Officer
- v. Vice President, Reimbursement
- vi. Chief of Enterprise Services
- vii. Chief Communications Officer
- viii. Treasurer
- ix. Vice President, Tax
- x. Chief Human Resources Officer
- xi. Chief Nursing Officer
- xii. Vice President, Real Estate
- xiii. Operations Chief Financial Officer
- xiv. Vice President, Internal Audit
- xv. Chief Financial Officer
- xvi. Chief Risk Officer
- xvii. Chief Information Security Officer

Designated Authorized Spokespersons

- 2) The following individuals (“Authorized Spokespersons”) are the only persons authorized by this policy to speak on behalf of the Company to Covered Persons:
- a) Chief Executive Officer;
 - b) Chief Financial Officer;
 - c) President of Hospital Operations;
 - d) Executive Vice President, General Counsel & Secretary; and
 - e) Vice President of Investor Relations.

Additionally, the Chief Communications Officer is an Authorized Spokesperson for Company communications other than items related to material nonpublic information, financial information or other items potentially requiring a Form 8-K filing.

- 3) Other employees of the Company may be designated by the Disclosure Committee as Authorized Spokespersons from time to time to speak on behalf of the Company (e.g., at investor meetings) or to respond to specific inquiries from Covered Persons.
- 4) No person other than an Authorized Spokesperson is authorized to respond to inquiries from Covered Persons. Persons who are not Authorized Spokespersons who receive either direct or indirect inquiries from Covered Persons must refer all such inquiries to an Authorized Spokesperson. This will help to ensure consistent disclosure and avoidance of selective disclosure. Individuals who receive such inquiries either directly or indirectly must refer the inquirer to the Company’s Vice President of Investor Relations, or the Company’s Investor Relations number at 615-296-3016 or Investor.Relations@ardenthealth.com. It is the Company’s policy that every effort is made to have more than one Authorized Spokesperson be in attendance for meetings or discussions with the news media, investment community,

industry analyst or other outside interested party to ensure consistency in and appropriateness of disclosure, and to document/record each discussion/communication.

- 5) To the extent practicable, Authorized Spokespersons should contact the General Counsel before having conversations regarding material information with any Covered Persons in order to review as much of the substance of the intended communication as possible, including scripts, slides and other prepared materials.

Issuance of Press Releases

- 1) A press release will be issued on new material developments, unless the General Counsel determines that such developments should remain confidential for the time being and appropriate control of that insider information is instituted along with ensuring that insider trading on such information is prohibited. All press releases issued by or on behalf of the Company in any form/medium must be approved in advance by one of the following:
 - a) the General Counsel; or
 - b) the Audit Committee or full board of directors.
- 2) Any release containing financial information must be reviewed and approved in advance by the Audit Committee. Any material information that is to be intentionally discussed or presented in any meeting or conversation with analysts or investors will be preceded by the issuance of a broadly disseminated press release (for example, via Dow Business Wire, PR Newswire or Thomson Reuters) or, if approved by the General Counsel, by posting to the Company's website: www.ardenthealth.com on the Investor Relations page.
 - a) As an NYSE-listed company, the Company may disclose new material information during a conference call that is properly announced and is fully accessible to all in the investing community through means of a webcast or teleconference, provided the Company informs the NYSE compliance team, during trading hours at least 15 minutes in advance of the presentation, of the nature of the information. All press releases should be distributed to the NYSE in advance of their release, in accordance with NYSE requirements.

Earnings Releases and Conduct of Conference Calls

- 1) The Company holds open, publicly accessible conference calls to discuss quarterly financial results and other significant events that arise in the course of its business. The Company's quarterly earnings information shall be disclosed as set forth herein.
- 2) First, a press/earnings release containing a discussion of the Company's quarterly earnings results shall be submitted to the appropriate newswire services for dissemination to the public. All such press releases shall be approved as outlined above. Such press releases shall also be sent in advance to the Company's board of directors as well as to the independent auditors and the Company's General Counsel and, if appropriate, outside legal counsel for review and approval.
- 3) Second, advance notice of the date, time and connection instructions for the quarterly

earnings conference call will be included in a press release disseminated at least 48 hours prior to the time of such call.

- 4) Third, the quarterly earnings calls shall be broadcast live (and may include pre-recorded material) on a medium that will allow the public, without charge, to listen to the call. In addition, a replay of the call will be publicly available, via phone for a period of not less than 24 hours after the live event, and via the Internet for a period of not less than one year after the live event.
 - a) Assuming that the foregoing provisions have been complied with, the contents of the quarterly press release may be freely discussed on the quarterly earnings call. No individual may discuss earnings or other financial information with anyone outside of the Company except in accordance with this policy.
 - b) In compliance with Regulation G and Section 409 of the Sarbanes-Oxley Act of 2002, an earnings release will be furnished on a Form 8-K within four business days from its release. However, under normal circumstances, the Company will attempt to furnish its earnings release on Form 8-K prior to the earnings conference call to avoid, under the 48-hour exemption rule, having to furnish a transcript of the conference call on Form 8-K should new material and/or non-GAAP information be discussed during the call. The Company, however, will post that information promptly on its website.
 - c) The Company will reconcile non-GAAP information to GAAP equivalent information in the earnings release and will promptly post that information on its website, in accordance with Regulation G requirements. Since the Company normally discusses non-GAAP information in the associated conference call, the release will also provide the location on the Company's website where the required reconciled information will be available.
 - d) The Company may allow only analysts to ask questions on the conference call and/or webcast and will attempt to respond to as many questions as possible as time may allow. All others may listen to the call via the Internet on the Company's website.
 - e) As a general matter, questions raised by analysts or other securities industry participants in conference calls should be resolved on the call. Under Regulation FD, as a general matter it is not acceptable to defer responding to such questions with the statement that they will be addressed "offline" or "in a smaller group," unless the matter is clearly nonmaterial or involves retrieving public information for the convenience of the questioner.

Conduct of Investor Meetings and Conferences

- 1) The Company makes a practice of responding to analyst and investor inquiries in the form of phone conversations or meetings with the Vice President of Investor Relations and other members of the senior management team and meetings with groups of analysts and investors. The purpose of these meetings is for investors to gain a better understanding of the

strategies and fundamentals of the Company, as well as to give analysts and investors the opportunity to personally meet and assess management. The Company also participates in a number of both Company-hosted and analyst-hosted conferences, presentations, and other meetings, as schedules permit. Prohibited selective disclosure of material nonpublic information by the Company is not permitted in these meetings. However, if the General Counsel has made a determination that material nonpublic information may have been disclosed unintentionally, the Company shall issue a press release, file or “furnish” a report on Form 8-K, or through another Regulation FD compliant method, and publicly disclose the information as soon as possible but not later than 24 hours after the determination that the information is material (or prior to the next day’s trading on the NYSE, if later). The Company shall, when reasonably practicable, announce publicly that such conference, presentation, or meeting will be held.

- a) The Vice President of Investor Relations or his or her authorized designee or another Authorized Spokesperson will accompany senior management in any meetings or discussions with the investment community in order to, at a minimum, monitor the conversation for any unintentional disclosure of new material information and to facilitate getting that information released promptly.
- b) To mitigate the risk of selective disclosure of material nonpublic information at investor meetings and presentations, the Company has implemented “Rules of the Road” that apply to investor meetings. The Rules of the Road are attached to this policy as Exhibit A.

One-on-One Meetings

- 1) Planned conversations and one-on-one meetings, to the extent possible, should be outlined in advance. The Vice President of Investor Relations or her authorized designee or another Authorized Spokesperson should attend all such one-on-one meetings. It should be determined in advance whether it is intended that any material nonpublic information be disclosed. If so, the material nonpublic information should be disclosed prior to or simultaneously with the planned conversation by the issuance of a press release, the filing or “furnishing” of a report on Form 8-K or through another Regulation FD-compliant method.
 - a) Inquiries from analysts, stockholders, or any other interested party to any director or employee other than an Authorized Spokesperson must be forwarded to the Vice President of Investor Relations, or in his or her absence, the General Counsel. Under no circumstances should any attempt be made to handle these inquiries without prior authorization from an Authorized Spokesperson.
 - b) The Vice President of Investor Relations or his or her authorized designee or another Authorized Spokesperson will maintain a written record of all one-on-one communications.

Responding to Market Rumors

- 1) The Company's Authorized Spokespersons shall not comment on any market rumors, leaks, speculation, or other similar information without first consulting with the Company's General Counsel. This approach is used to avoid providing any implied confirmation or denial of the rumor or speculation. Exceptions to this policy should be reviewed and approved in advance by the General Counsel. Should the NYSE request the Company to make a definitive public statement in response to a market rumor that is causing significant volatility in the stock, the General Counsel will consider the matter and make a recommendation to the Chief Executive Officer on whether to make an exception to this policy. Rumors about the Company that are posted in Internet chat rooms are covered by this policy. Individuals should not respond to such rumors found in Internet chat rooms, and all rumors should be referred to the designated Authorized Spokesperson for appropriate action.
 - a) The General Counsel should be notified of any rumor or unusual trading activity as soon as possible.

Handling Forward-Looking Information: The Company may, from time to time, provide forward-looking information (on a consolidated or "same-facility" basis or both), including revenue, earnings per share, net income, operating profit, profit margin, hospitals operated, patient admissions, tax rate, and information about significant new developments. The decision whether to provide forward-looking information is the responsibility of the Disclosure Committee in consultation with the executive leadership of the Company. A forward-looking statement made in the Company's written disclosures must be accompanied with meaningful cautionary language warning investors that the Company's actual performance could differ materially from what was included in the forward-looking statement. In the case of disclosures including oral forward-looking statements (*e.g.*, conference calls or investor meetings), the Company will refer to such cautionary language and the risk factors enumerated in other readily available written documents at the beginning of the disclosure.

Providing Earnings Guidance

- 1) The Company may, in accordance with this policy, provide a reasonable range of earnings estimates and underlying assumptions for the forthcoming year in its earnings release and may provide such guidance for the forthcoming quarter. The Company may, but is not required to, update the range of estimates should it become likely that the range will change materially. The Company may also, but is not required to, confirm its earlier guidance during the quarter if it has not changed materially. Any such update will be done in a widely disseminated press release. Updates to previous earnings guidance must only be made pursuant to this policy.
 - a) The Company will not comment on an analyst's estimate(s) in relation to the Company's range of estimates except to refer the analyst to what the Company has stated publicly.
 - b) In response to any questions about the Company's earnings projections, if provided,

the Authorized Spokesperson should state that it is the Company's policy not to comment on projections during the quarter. No Authorized Spokesperson shall provide "comfort" with respect to an earnings estimate, earnings model, or a consensus number or otherwise "walk the Street" up or down (i.e., suggest adjustments to an analyst's estimates). If an inquiry is received as to the reliability of a previously publicly disseminated projection, the Authorized Spokesperson should follow the "no comment" approach, however an Authorized Spokesperson may remind the individual of the date and forum in which the Company last disclosed such information, stating that he or she is not reaffirming guidance by referencing the historical guidance given.

Quiet Period: The Company will observe a quiet period (each, a "Quiet Period") commencing as soon as quarterly or year-end earnings may be known (generally 21 days prior to an earnings release) and continuing until the earnings are publicly released. During a Quiet Period, the Authorized Spokespersons will not comment on the Company's previous earnings guidance or other aspects of its financial performance without prior approval of the General Counsel. Though it is preferable to avoid investor meetings during any Quiet Period, the Company may choose to participate in investor phone calls, meetings, or conferences, but will not discuss current operations or results of the business. If circumstances are such that the members of the Disclosure Committee feel it is desirable to comment on such matters during this period, the Company will do so only by way of a press release.

Reviewing Analysts' Draft Models or Reports

- 1) Upon an analyst's request and approval by the Disclosure Committee in consultation with the executive leadership of the Company, draft analyst earnings models or reports may be reviewed and commented upon by one or more Authorized Spokespersons. Comments on drafts shall be limited to review for, and correction of, factual accuracy of information that is in the public domain. In no event shall an Authorized Spokesperson comment on, confirm, deny, or guide any forward-looking statements or financial projections contained in such models or reports.
 - a) The Company shall not provide such analyst reports or models through any means to any person outside of the Company. Instead, the Company will post on the investor relations section of its website the names and firms of analysts who are currently covering the Company.

Analyst and Investor Access to Information and Company Officials

- 1) The Company will provide fair access to Company information and senior management within the limits of its time and resources. All members of the investment community will at least have access to the Company's Investor Relations department. Requests for meetings with senior management may be met as schedules permit and may be determined by such criteria as the number of shares an investor holds in the Company's securities, an analyst's or

investor's knowledge of the Company and the industry or industries in which the Company operates, and how often the analyst or investor has met with senior officials in the Company. Under no circumstances will access be denied to senior management on the basis of a negative recommendation on the Company's stock or a decision to sell the Company's stock.

- 2) Planned conversations must include at least one Authorized Spokesperson and should, if practicable, include a second person. It should be determined in advance whether any material nonpublic information will be disclosed. If so, such information should be disclosed prior to or simultaneously with the planned conversation by the issuance of a press release or the filing or "furnishing" of a report on a Form 8-K or both.

Providing Material Information to the Media: While disclosures to news media are not covered under Regulation FD, material information should not be disclosed to the media unless it is simultaneously disclosed to the investment community and the public. Therefore, the Company will not provide exclusive stories to the media of upcoming material events that have not been publicly announced without prior approval by the General Counsel.

Use of Social Media: The Company's policy is that social media such as corporate blogs, employee blogs, chat rooms, Facebook, X (formerly Twitter), LinkedIn, YouTube, or similar electronic media should not be used to disclose material nonpublic information. Any disclosure on social media regarding Company performance or material nonpublic information should be approved in advance by the General Counsel.

Communication with Proxy Advisory Firms: The Company shall make public disclosure of material nonpublic information at or before the time that an Authorized Spokesperson presents such information to a proxy advisory firm for purposes of advocating for a favorable recommendation or other purpose. Distribution of written materials to proxy advisory firms shall also be filed with the SEC where required by applicable law and regulations.

Inadvertent or Unintentional Disclosure of Material Nonpublic Information: Disclosure issues generally, and in particular with Regulation FD, comprise a highly technical area of law with important consequences for the Company and its employees. If a director, employee, or independent contractor believes that there may have been an inadvertent or unintentional disclosure of material nonpublic information, the director, employee, or independent contractor must immediately notify the General Counsel. The Company may have a very short period of time (in some cases only 24 hours) to determine whether Regulation FD requires disclosing such information to the public. If the General Counsel determines that material nonpublic information has been disclosed, the Company will promptly file a Form 8-K with the SEC and/or issue a press release (no later than 24 hours after discovering the unintentional disclosure or at the opening of trading on the NYSE, whichever is later) containing that information and will post that information on the Company's website: www.ardenthealth.com.

Violations: Violations of Regulation FD are subject to SEC enforcement action and could result in significant liability for the Company or an individual. Any violation of this policy should be immediately reported to the General Counsel or another Authorized Spokesperson and may constitute grounds for termination of employment or service. Any questions regarding this policy should be directed to the General Counsel or his or her designee.

Review and Approval: The Office of the General Counsel of the Company will have primary responsibility for maintaining, reviewing, and revising this policy.

Exhibit A

Investor Meetings “Rules of the Road”

- Comments should only be comprised of publicly available information or non-material elaborations on publicly available information. Prior to investor meetings, the most recent Company earnings release, earnings guidance, and/or annual investor presentation should be reviewed for reference.
- Company policy for disclosure of certain relationships and performance items:
 - The Company may NOT:
 - disclose quarterly revenue or profit performance;
 - comment on current Company business trends (since the most recent, prior earnings release);
 - comment on the status of impending acquisitions, divestitures, or joint ventures; or
 - deviate from current guidance as to financial performance or operating information.
- During communications with analysts and investors, communications should be guarded. Specifically:
 - employees should not feel compelled to answer questions;
 - when answering questions, employees should not speculate or answer hypothetical questions;
 - answers to all questions must remain in the employee’s area of expertise, although real examples or stories about the employee’s business may be discussed so long as they are consistent with publicly available information; and
 - it is not acceptable to defer responding to questions with the statement that they will be addressed “offline,” “in a smaller group” or “off-the-record” discussions unless the matter is clearly nonmaterial or involves retrieving public information for the convenience of the speaker.
- Be aware of goals of the analyst. Specifically:
 - Sell-side analysts write investment reports and publish their views, while buy-side analysts work for the benefit of their firms.
- Be cautious with nonverbal communications. Analysts will draw conclusions from body language and tone of voice. Remember, nonverbal disclosures are reviewed by the SEC when determining whether a Regulation FD violation has occurred.
- Comments should not be made about other companies. If pressed, take the high road.

- Do not give out business cards. Direct all investor questions to the Investor Relations department.

ACKNOWLEDGEMENT AND AGREEMENT

Ardent Health Partners, Inc.
(“Ardent Health Partners” or “the Company”)
Corporate Disclosure Policy

All Ardent Health Partners, Inc. personnel shall file annually a signed, written certificate, affirming that they have read, understood, and complied with this Corporate Disclosure Policy as follows:

I ACKNOWLEDGE that I have read, considered, and understand the Corporate Disclosure Policy of the Company and I agree to conduct myself in accordance with the Corporate Disclosure Policy as it applies to me and my responsibilities at Ardent Health Partners. I undertake to affirm in writing, at least annually during the term of my employment, that I have read, understood, and complied with the most recent version of the Corporate Disclosure Policy.

Dated this _____ day of _____, 20_____.

(Signature)

(Print name)