

POLICY RELATED TO POLITICAL AND LOBBYING EXPENDITURES

March 10, 2020

DaVita Inc. (the “Company”) engages in the political process to support issues of central importance to our business by taking action, as permitted by law, to ensure federal and state officials understand the needs of our patients and the mission of our Company. Our public policy priorities and advocacy efforts, including related expenditures, are focused on advancing the interests of our patients and the Company, align with the public policy goals of the Company, and are made without regard for the private political preferences of Company executives.

Our Government Affairs team has established written internal policies and procedures regarding our corporate political giving, advocacy and lobbying expenses and the operation of the Company’s political action committee (“DaPAC”). Our political spending generally includes corporate expenses related to federal and state regulatory and legislative efforts, including policy development, lobbying, corporate political donations to state candidates for office, political donations to federal candidates from DaPAC, and advocacy related to state ballot initiatives or referendums. Key management members of our Government Affairs team are involved in developing the annual funding goals for corporate advocacy efforts, including our Group Vice President, Government Affairs, Vice President, Federal Government Affairs, and Vice President, State Government Affairs. The DaPAC board of directors, along with the Company’s senior management team, are also asked to review and provide their concurrence with these annual funding goals.

Board Oversight

The Company’s majority independent Board of Directors (the “Board”) oversees our Government Affairs activity and political spending, and receives reports, no less than annually, from senior management on these matters. The Government Affairs team regularly reports to the Board regarding the status of the Company’s public policy and legislative priorities. Such reports typically include a review of actions taken by the state and federal Government Affairs teams, status of legislation of interest to us, primarily because of its potential impact on our business and operations, teammates and/or patients, and an update on lobbying and political spending by the Company and DaPAC.

Lobbying Activities

Our lobbying activities in the United States are strictly regulated by federal, state and local lobbying laws. Each governing jurisdiction determines its own regulation regarding lobbying compliance and also establishes the policies and guidelines associated with reporting and disclosure. We are committed to compliance with the letter and spirit of each of these laws. We file publicly available lobbying disclosure forms and campaign finance reports on a regular basis, as required by law, for spending by our Company and DaPAC, as described further below.

Federal Lobbying Activities

Federal lobbying activities are governed by the Lobbying Disclosure Act of 1995, as amended (“LDA”), which requires that organizations that employ federal lobbyists (within the meaning of the LDA), file a registration statement and periodic lobbying activity reports. The Company is also required to file quarterly and semi-annual disclosure reports detailing certain political contributions, and other specified payments relating to “covered officials” as defined within the LDA. These Company reports include contributions made by DaPAC and certain other contributions required to be reported.

The Company files federal lobbying reports with the Office of the Clerk of the U.S. House of Representatives and the Secretary of the U.S. Senate. These reports are publicly available at <http://lobbyingdisclosure.house.gov/> and disclose corporate expenditures related to lobbying and issues lobbied. The Company is also required to observe Federal laws that regulate the relationships between the Company and public officials to avoid conflicts of interest and to limit or prohibit certain gifts to public officials.

State Lobbying Activities

The Company's Government Affairs team has lobbying representation, including teammates and hired lobbyists, across the U.S., and their primary objective is to monitor state-level legislative and regulatory developments that could potentially impact our Company, teammates and/or patients.

The state laws governing lobbying activity and related disclosures vary from state to state, but nearly all states require that lobbyists, and those that hire lobbyists, submit periodic disclosures reporting related spending. These reports generally include disclosures relating to lobbying expenditures, legislative issues are being lobbied, and for which officials' benefit the expenditures are made. The Company is also required to observe state laws that regulate the relationships between the Company and public officials to avoid conflicts of interest and to limit or prohibit certain gifts to public officials.

The Company files state-level lobbying reports, and such reports generally are publicly available on the website of the state-regulatory body that governs such disclosures.

DaVita Political Action Committee

As permitted by the federal election laws, DaVita also sponsors the DaPAC that provides contributions to federal candidates, political parties, committees or entities in federal elections. Generally, the DaPAC contributes to candidates who support and protect the legislative interests of the Company, our teammates and/or our patients. Contributions by DaPAC are made without regard for the private political preferences of DaVita's Board, executives or officers.

The DaPAC is funded solely by voluntary donations from eligible DaVita teammates. DaVita does not pressure or coerce employees to make personal political expenditures or take any retaliatory action against employees who do not.

All DaPAC disbursements are publicly available on the Federal Election Commission's website at www.fec.gov.

Trade Associations

The Company participates in a very limited number of trade associations and membership organizations with which our Government Affairs team is involved. For example, the Company has memberships with two kidney care coalitions, Kidney Care Council and Kidney Care Partners, which engage on legislative and regulatory issues at the federal and state levels to advocate for patient access, quality care, and education programs, among other things. Members of our Government Affairs team serve on committees that set policies on political activities for these organizations, which generally operate by unanimous consent of the members. Additionally, the Company holds a seat on the board of each of these two organizations. The Government Affairs team is directly involved in other organizations where it holds memberships, and in some cases, serves in leadership or policy making functions with those organizations. The Company includes in its reported Federal lobbying expenses, the portion of our dues paid to these trade associations that the trade associations use for lobbying expenses.