

**CHEMED CORPORATION**  
**POLICIES ON POLITICAL ACTIVITIES**

**Overview:**

Our patients, their families, community groups, trade associations, political organizations and others regularly approach Chemed Corporation (the “Company”) and its subsidiaries (collectively, “Chemed”) to support civic, charitable and political activities.

Local, state and federal laws govern involvement by Chemed in political, campaign, and public policy related activities. These statutes contain numerous prohibitions and detailed reporting and record-keeping requirements. They also contain enforcement provisions that carry penalties for noncompliance. Employees of Chemed and its subsidiaries may be asked to participate in activities that are governed by one or more of these statutes.

These policies are intended to help ensure compliance by Chemed with these laws and regulations. They do not apply to personal activities employees engage in at their own cost and on their own time.

**Federal Political Campaign Contributions:**

Federal laws govern the giving or use of corporate funds for candidates campaigning for federal office, such as the United States Senate, U.S. House of Representatives or the President. These laws apply to candidate campaigns and to solicitations from third parties, such as external political action committees (“PACs”), whose purpose is to help elect candidates for federal office. Chemed does not contribute corporate funds to federal candidates or to PACs that support federal candidates.

**State & Local Political Campaign Contributions:**

Individual state and local laws govern contributions to candidates running for election to state and local offices. In determining which candidates (or PACs whose purpose is to elect state and local candidates) to support with a contribution, consistent with these laws, Chemed considers a number of criteria, such as:

- The integrity and character of the candidate;
- The candidate’s demonstrated support, position and/or voting record on end-of-life issues, the plumbing regulatory environment, and other issues relevant to Chemed;
- The candidate’s holding of a leadership or policy position in his or her party or on a legislative committee, or the likelihood of attaining one;
- The candidate’s holding of a position of influence over Chemed’s issues;
- The nature and strength of the candidate’s opposition in primary or general elections; or

- Other sources and the amount of financial support available to the candidate.

All such contributions must comply with applicable law. In consultation with the Executive Vice President of Development and Public Affairs at Vitas, its Chief Executive Officer must approve all requests for state and local political contributions from Vitas Healthcare Corporation corporate funds up to a maximum of \$75,000 per year. Amounts above \$75,000 must be approved by the Chemed's Chief Executive Officer.

### **Candidate Fund Raising Events and Other Politically-Related Contribution Requests:**

Candidates and their supporters may hold social activities as political fundraisers. Because federal and many state laws impose restrictions on the use of corporate funds for these activities, prior approval is required from the Chief Executive Officer or Vitas' Chief Executive Officer.

Chemed may consider contributing to ballot initiatives, get out the vote activities and partisan organizations such as the Democratic and Republican governors associations. These types of activities also require review and approval by the Chief Executive Officer.

### **Lobbying-related Activities / Government Contacts:**

Federal, state and local statutes govern corporate lobbying activities. These statutes require specific reporting of activities and expenses associated with advocating on legislative and regulatory issues. Contacts with officials and other efforts to influence government action may constitute lobbying activities under various state and local laws.

While the Federal Lobbying Disclosure Act exempts infrequent contacts with federal lawmakers and their staffs, advance consultation with the Vitas Executive Vice President of Development and Public Affairs is required to confirm the ground rules for these discussions and ensure proper reporting. Employees must also consult with the Executive Vice President of Development and Public Affairs before contacting state and local officials. This is especially important given the wide variation in rules from state to state and locality to locality.

### **Independent Expenditures:**

“Independent expenditures” are defined for the purpose of this policy as those funds given or expended to directly support or defeat a candidate, without collaboration of the candidate. Chemed's policy is to not make any independent expenditures even if lawful.

### **Contributions to Political Parties:**

Contributions to national and state political parties by a corporation are strictly governed by Federal and state law. Any such requests should be forwarded to the Vitas Executive Vice President for Development and Public Affairs and shall not be made unless (i) lawful, and (ii) with the prior approval of Vitas' Chief Executive Officer.

**Party Conventions:**

Chemed may decide to participate in or contribute to state or federal political party conventions. Any such participation or contribution requires the review and prior approval of the Chief Executive Officer.

**Nominating Committee Review:**

The Company's Nominating Committee annually reviews a report of political contributions made with Chemed funds.