

	Ethics & Compliance Department	
	Policy No.: 2	Created: 03/2006
		Reviewed: 05/2023
		Revised: 10/2022

CHARITABLE CONTRIBUTIONS

SCOPE:

Applies to all Envision Healthcare teammates. For purposes of this policy, all references to “teammate” or “teammates” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

Envision Healthcare and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Charitable Contribution Policy in order to set forth the guidelines to be followed by Envision Healthcare, its subsidiaries and affiliates, including the Envision Healthcare Charitable Fund, in providing charitable contributions to clients, affiliates, or suppliers of Envision Healthcare.

This policy does not apply to contributions made through the Envision Employee Relief Fund or political donations.

POLICY:

All teammates of Envision Healthcare or any of its affiliated or managed companies (collectively, the “Company”) shall comply with the following guidelines when providing charitable contributions:

- All charitable contributions must be approved in accordance with this Policy and the procedures described below.
- Recipients of charitable contributions may use such funds only in accordance with the charitable intent, as communicated at the time the contribution was approved.
- Company teammates must follow this Policy when responding to organizations seeking charitable contributions.
- No charitable contributions will be made to any organization if the Company becomes aware of any facts or circumstances suggesting that the contribution is compensation or remuneration for referring or recommending potential or existing patients to Envision Healthcare.

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NO FUNDS SHOULD BE EXPENDED AS CHARITABLE CONTRIBUTIONS ON BEHALF OF THE COMPANY OR THE ENVISION HEALTHCARE CHARITABLE FUND OUTSIDE THE CONTEXT OF THIS POLICY UNLESS SPECIFICALLY APPROVED BY THE CHIEF COMPLIANCE OFFICER (“CCO”).

PROCEDURE:

All charitable contributions will be made through the Envision Healthcare Charitable Fund (the “Charitable Fund”) or such other charitable contribution fund(s) as may be established from time to time (collectively, the “Additional Funds”) and, together with the Charitable Fund they are referred to as “Approved Funds”) by the Chief Executive Officer and Chief Financial Officer of Envision Healthcare Corporation.

The procedures and processes for review of a proposed contribution (the “Approved Procedures”) will be established from time to time by the Board of Directors of the Charitable Fund (the “Fund Board”) and/or the governing body/ies of the Additional Funds (collectively, together with the Fund Board, the “Governing Bodies”). The Company – on behalf of and in connection with the applicable Governing Bodies – will communicate the Approved Procedures to teammates from time to time.

All charitable contributions will be made through the Approved Funds, and no commitment to any charitable contribution should be implied or communicated until all approvals are received in accordance with the Approved Procedures.

All questions regarding this Policy shall be directed to the Ethics & Compliance Department.

Additional Requirements for Hospital-Affiliated Foundations

The Approved Procedures will include a requirement that Company teammates who submit a request for a charitable contribution provide information (in such form as required by the Approved Procedures) sufficient to verify whether the charitable organization constitutes a “Hospital-Affiliated Foundation.” “Hospital-Affiliated Foundations” are organizations in which:

- The organization (or its affiliate or parent organization) is licensed as a healthcare provider.
- The organization (or its affiliate or parent organization) directly bills federal healthcare programs, including but not limited to, the Medicare, Medicaid and CHAMPUS Programs.
- The organization has an effective patient choice of provider/supplier policy in effect.

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Company teammates who submit a request for a charitable contribution to a Hospital-Affiliated Foundation will be required, pursuant to the Approved Procedures, to submit additional documentation regarding the proposed charitable contribution and any contribution to a Hospital-Affiliated Foundation will be subject to a review by the Ethics & Compliance Department.

The Company will not consider or review a proposed charitable contribution if the Company is in active contract negotiations with the Hospital of the Hospital-Affiliated Foundation.

Obligations of Company Personnel

This Policy and the Approved Procedures apply to all charitable contributions, regardless of type of contribution. Accordingly, Company teammates shall not:

- Make any commitment on behalf of the Company or the Charitable Fund – whether express or implied – until all approvals are received.
- Attend any fundraising event on behalf of the Company or the Charitable Fund unless the related charitable contribution has received the required approvals.
- Make any connection whatsoever between any charitable contribution and the possibility that the potential recipient may promote the use of Company’s services.
- Direct the Applicant to use charitable funds for specific individuals.
- Absent approval from the applicable Governing Body/ies or as otherwise expressly provided in the Approved Procedures, advertise to the public as to the availability of any charitable contribution fund established under this Policy, for example, in any publication generally available to the public, on television or radio.
- Use the Company’s charitable giving as a marketing device.
- Advertise to the public as to the availability of any other charitable contribution fund that may benefit existing or prospective customers, whether or not the Company has provided such fund with a charitable contribution pursuant to this Policy, for example, in any publication generally available to the public, on television or radio.
- Represent that charitable contributions provided through this Policy are designated for particular individuals (regardless of whether they are patients of Company affiliates) or otherwise take credit for any charitable contribution made to a particular organization.

POLICY REVIEW

The Ethics & Compliance Department will review and update this policy, when necessary, in the normal course of its review of the Company’s Ethics & Compliance Program.