

	Ethics & Compliance Department	
	Policy No.: 4	Created: 06/2006
		Reviewed: 04/2023
	Revised: 09/2020	

EXECUTIVE COMPLIANCE COMMITTEE

SCOPE:

Applies to all members of the Envision Healthcare Executive Compliance Committee (the “ECC”). 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:

Although it is the responsibility of all teammates and subsidiaries and affiliates within the Envision Healthcare (“Envision” or “the Company”) network to comply with the Company’s Ethics & Compliance Program, the Company has adopted this Executive Compliance Committee Policy in order to establish a committee of executive management personnel to have primary oversight of the Ethics & Compliance Program. Day-to-day administrative responsibilities are assigned to the Company’s Chief Compliance Officer (“CCO”).

POLICY AND PROCEDURE:

Establishment of the Envision Healthcare Executive Compliance Committee

The Executive Compliance Committee’s responsibilities include:

- Confirming the proper evaluation and response to ethical and regulatory issues and concerns.
- Reviewing proposed revisions to the Company’s Code of Business Conduct & Ethics manual and compliance policies to confirm the standards are reasonably capable of reducing improper conduct.
- Recommending and monitoring educational and teaching activities to ensure the Company’s standards and procedures are communicated effectively to all teammates.
- Assessing results of internal/external reviews to achieve compliance with the Company’s standards.
- Analyzing reports of misconduct and recommending and monitoring appropriate corrective action.
- Confirming proper enforcement with the Company’s standards and procedures through appropriate case-specific disciplinary measures.
- Oversee the development and publication of a confidential reporting system that enables teammates and contractors to report improper conduct without fear of retaliation.

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Members of the ECC include, but are not limited to, the Chief Executive Officer, Chief Financial Officer, Chief People & Culture Officer (leader of Human Resources), Chief Audit Officer, General Counsel, and the Company’s Chief Compliance Officer. The CCO is responsible for developing meeting agendas and distributing pertinent review information to members.

Compliance Officer Responsibilities

The Company’s CCO has the responsibility for the day-to-day management and directing of the Company’s Ethics & Compliance Program. The CCO reports directly to the Company’s Chief Executive Officer for administrative purposes with a “dotted” reporting line to the Company’s Compliance Committee of the Board of Directors. The CCO has a working relationship with senior management, legal counsel, and departmental managers and is available to all teammates and clients.

The CCO performs the following responsibilities:

- Oversee and monitor the implementation of the Ethics & Compliance Program.
- Review and revision of Company Compliance policies, procedures, and practices.
- Development, approval, and monitoring of educational and training materials and activities.
- Review and investigation of all reports of potential non-compliance, with establishment of corrective action plans where necessary.
- Implementation and oversight of both internal audits and audits performed by outside professional firms.
- Preparation and submission of any requisite annual reports (or more frequently, if circumstances require) to the ECC and other entities as required.
- Development of policies and programs that encourage teammates to report suspected misconduct and violations of policies, laws and regulations.

Reporting Relationships

The CCO interacts closely with each department to ensure an understanding of overall Envision Healthcare initiatives and establishment of quality monitoring initiatives that address any specific areas. Additionally, the CCO, or designee, works closely with the department heads to review results of audits and direct revision/updates in departmental processes based on quality reviews. The results of quality monitoring initiatives and any compliance issues raised by teammates or contractors through voluntary reporting mechanisms are submitted on a quarterly

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basis to the Envision Healthcare ECC for review and input on further educational efforts, policy changes, or other corrective action measures which are needed to assure compliance. Recommendations resulting from the ECC are reported to the Envision Healthcare Compliance Committee of the Board of Directors.

POLICY REVIEW

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