 Envision HEALTHCARE — PIONEERING THE DELIVERY OF CARE —	Policy No.: 6		
	Created: 10/2012	Reviewed: 9/2020	Revised: 9/2020

NON-RETALIATION POLICY

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all Envision Healthcare colleagues. For purposes of this policy, all references to “colleague” or “colleagues” 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 Non-Retaliation Policy to reinforce its commitment to prevent and protect colleagues from retaliation for reporting, in good faith, suspected wrongdoings and/or for assisting in an investigation.

POLICY AND PROCEDURE:


I. INTRODUCTION

As outlined in Envision’s Code of Business Conduct and Ethics, *Vital Signs*, it is Company policy to foster an environment of open communication so that all colleagues understand their obligations to report compliance concerns and understand that the Company will not tolerate retaliation against those who do so. In addition, reported concerns will be maintained confidentially, to the extent it is possible to do so.

“Getting even” behavior is not tolerated, and all reported allegations of retaliation are fully investigated by the Ethics & Compliance Department with the assistance of other departments, as appropriate. All supervisors are responsible for enforcing this policy. Individuals who violate this policy will be subject to the appropriate and applicable disciplinary process, up to and including termination or dismissal.

II. INVESTIGATION OF RETALIATION CLAIMS

Employees who believe they have been retaliated against for reporting, in good faith, suspected wrongdoings and/or assisting with an investigation, should report the issue by contacting the Company’s Ethics and Integrity Compliance Helpline at 877-835-5267 or by calling the Ethics & Compliance Department directly at 615-922-6125. It is important to

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file the report of retaliation as soon as possible after the occurrence as a delay can impact the effectiveness of the investigation.

After a report of retaliation has been received, the Ethics & Compliance Department will begin an investigation. The investigation involves interviewing all appropriate individuals and reviewing relevant documentation to determine the validity of the report of retaliation. Corrective action may be warranted pending the outcome of the investigation.

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.