

	Ethics & Compliance Department	
	Policy No.: 49	Created: 01/2018
		Reviewed: 09/2024
	Revised: 05/2023	

HIPAA: WHISTLEBLOWER PROTECTIONS

SCOPE:

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 Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Whistleblower Protections policy in order to encourage compliance and enforcement by all Company teammates and mandates that the Company will refrain from retaliatory acts against individuals who file complaints or report a violation as a Whistleblower or as a crime victim.

POLICY:

The Company does not condone and will not allow any retaliatory acts toward any individual including but not limited to patients and teammates for reporting any violation of the Company’s privacy policies or a breach of the Company’s security infrastructure.

The Company will not intimidate, threaten, coerce, discriminate against, or take other retaliatory action against any individual(s) for:

- A) Exercising any right under, or for participating in any process established by, HIPAA’s privacy rules (Title II, Part 164 Subpart E), including the filing of a complaint with the Company or the Secretary of U.S. Department of Health and Human Services;
- B) Testifying, assisting, or participating in an investigation, compliance review, proceeding, or hearing under Part C of Title XI of the Social Security Act; or
- C) Opposing any act or practice made unlawful by HIPAA’s privacy rules (Title II, Part 164 Subpart E), provided the individual has a good faith belief that the practice opposed is unlawful and the manner of the opposition is reasonable and does not involve an improper disclosure of PHI.
- D) Filing a complaint or reporting a violation related to the Company’s privacy and security policies and procedures.

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The Company has provided a method for workers to report violations and breaches anonymously. Company employees may use the compliance “Helpline” for reporting incidents (toll-free 877-835-5267).

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.