

	Ethics & Compliance Department		
	Policy No.: 4	Created:	06/2006
		Reviewed:	06/2026
		Revised:	09/2020

EXECUTIVE COMPLIANCE COMMITTEE

SCOPE

Applies to all members of the Envision Executive Compliance Committee (the "ECC"). For purposes of this policy, all references to "clinician" or "teammate" include temporary, part-time and full-time employees, independent contractors, officers and directors.

PURPOSE

Although it is the responsibility of all clinicians, teammates, subsidiaries and affiliates within the Envision Healthcare Operating, Inc. ("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 leadership 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 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 clinicians and 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

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- Oversee the development and publication of a confidential reporting system that enables clinicians and teammates to report improper conduct without fear of retaliation

Members of the ECC include, but are not limited to, the Company's Chief Executive Officer, Chief Financial Officer, Chief People & Culture Officer (leader of Human Resources), Vice President of Internal Audit, Chief Legal Officer and 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 leadership, legal counsel and departmental managers and is available to all clinicians, teammates, hospital partners and vendors.

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 clinicians and 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 initiatives and establishment of quality monitoring initiatives that address any

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specific areas. Additionally, the CCO, or designee, works closely with the department heads to review results of audits and direct revisions/updates in departmental processes based on quality reviews. The results of quality monitoring initiatives and any compliance issues raised by clinicians or teammates through voluntary reporting mechanisms are submitted on a quarterly basis to the Envision 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 Compliance and Quality Committee of the Board of Directors.

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.