

	Ethics & Compliance Department		
	Policy No.: 19	Created:	06/2025
		Reviewed:	06/2026
		Revised:	

CONFLICTS OF INTEREST

SCOPE

Applies to all Envision clinicians and teammates. 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

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Conflicts of Interest Policy to provide guidance to clinicians and teammates on the identification and disclosure of potential or perceived conflicts of interest.

POLICY

Pursuant to the Company’s Code of Business Conduct and Ethics (the “Code”), clinicians and teammates should not participate in any activities or enter into relationships that conflict or appear to conflict with their Company responsibilities. A conflict of interest, or COI, exists when your judgment, decision or actions in the workplace are compromised because of your personal interests, which can come from family, friendships, financial or social factors.

PROCEDURE

Clinicians and teammates must avoid, and promptly disclose, perceived or potential conflicts of interest. Treatment decisions must always be made in the best interests of our patients and business decisions must always be made in the best interests of the Company. Disclosing your conflict allows them to be reviewed, managed and documented, as appropriate.

Specifically, clinicians and teammates who have an ownership interest in, hold a Director or Officer position, are employed by or are contracted with another entity that provides services within the healthcare industry or to healthcare companies or practices, including to any healthcare or non-healthcare entity which provides or may provide services to the Company, must disclose such relationship to the Ethics & Compliance Department. Waivers or exceptions to any conflict of interest must be approved in writing by the Ethics & Compliance Department.

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Clinicians do not need to disclose outside clinical services that are permitted under their Envision employment or independent contractor agreement.

To disclose a potential conflict of interest, or request assistance in determining if a potential conflict of interest exists, call the Ethics & Integrity Helpline number at 877-835-5267 or complete the online compliance form at www.envisionhealth.com/compliance. You may also disclose a potential conflict of interest through the attestation process when completing new hire or annual compliance training.

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.