

	Ethics & Compliance Department		
	Policy No.: 11	Created:	07/2015
		Reviewed:	06/2026
		Revised:	06/2026

DATA AND DOCUMENT RETENTION AND DESTRUCTION

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.

This Policy applies to records and data in all formats and locations, including paper records, electronic files, email, messaging and collaboration platforms, databases, applications, cloud-based repositories, archives, backups, removable media, and records maintained by vendors or service providers on behalf of Envision.

PURPOSE

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Data and Document Retention and Destruction Policy to establish requirements for the retention, deletion, and destruction of records in accordance with the Data and Document Retention Schedule (“Schedule”), and applicable legal and regulatory requirements.

DEFINITIONS

For purposes of this Policy:

“Record” or “Records” means information, regardless of format or medium, created, received, or maintained in connection with Envision business, legal, regulatory, clinical, financial, operational, compliance, or administrative activities.

“Legal Hold” means a written or documented instruction from the Legal Department requiring preservation of specified Records or data because of litigation, reasonably anticipated litigation, subpoena, government inquiry, audit, investigation, or other legal or regulatory matter.

“Deletion” means removal of electronic information from an active user-facing location or system interface. Teammates should use caution when deleting; deletion does not necessarily mean the Records have been destroyed.

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"Destruction" means physical or logical destruction of Records or media so that the information cannot reasonably be read, reconstructed, or recovered.

"Record Owner" means the business function, department, or designated leader responsible for the Record and its destruction.

"Deletion/Destruction Log" means the Company-approved log or equivalent auditable record documenting deletion, purge, destruction, sanitization, or other disposition of Records.

POLICY

It is the Company's policy to manage Records effectively. Records that are no longer needed for business or legal reasons should be regularly deleted and/or destroyed in accordance with this policy.

All Records must be maintained and retained in accordance with the Schedule which is subject to applicable legal and regulatory requirements. In the event a Record is not expressly addressed in the Schedule, the Record should be retained for a period of seven (7) years.

Deletion or Destruction of Records

Prior to the Deletion or Destruction of Records, a Record Owner must:

- Confirm the retention period has ended
- Obtain written approval from a teammate at the level of Vice President or above
- Document pertinent information in Deletion/Destruction Log ("Log"), as detailed below

Records subject to Legal Hold shall not be deleted or destroyed until the Legal Hold has been lifted.

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Documentation of Deletion or Destruction

Deletion or Destruction of Records should be documented in the Log (see attached form). The Log should include:

- Date of Records
- Type of Records
- Date of destruction
- Method used
- VP level or above approval

All questions related to the process to delete or destroy Records should be directed to the Ethics & Compliance Department at complianceconcerns@envisionhealth.com.

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. The Schedule may be updated or modified to address business and legal requirements without seeking formal approvals from the Company's compliance committees.



DATA AND DOCUMENT DELETION/DESTRUCTION LOG

This form documents the destruction of Records in accordance with the Envision Compliance Program Policy # 11 - Data and Document Retention and Destruction.

1. DEPARTMENT	2. PERSON COMPLETING THE FORM (Name, Title)
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3. RECORDS TO BE DESTROYED					
Data/Document Description	Date Range		Location	Destruction Method	Disposal Date
	Start (mm/yyyy)	End (mm/yyyy)			

4. APPROVING LEADER (Print Name)	SIGNATURE	DATE (mm/dd/yyyy)
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Retention Schedule Access & Internal Use Notice

Envision maintains an internal [Data & Document Retention Schedule](#) that outlines required retention periods for all document categories governed by this policy. Because the schedule contains internal operational details, it is designated Internal Use Only and is not distributed broadly.

Clinicians and teammates who need access to the current retention schedule for operational, compliance, audit, or record-management purposes should contact the Ethics & Compliance Department directly at complianceconcerns@envisionhealth.com.

The Ethics & Compliance Department will provide the appropriate schedule version and any related guidance needed to support proper retention, storage, or destruction activities.