	Policy No.: 17		
	Created: 8/2019	Reviewed:	Revised:

## **POLICY AND PROCEDURE DEVELOPMENT**

### 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:**

To establish protocols for the development, implementation, review and revision of Envision Healthcare and its subsidiaries and affiliates (the “Company”) policies and procedures for areas that: (1) pose risk for non-compliance with laws and regulations, (2) promote compliance with applicable Federal health care program requirements and (3) promote compliance with the Code of Business Conduct and Ethics.

#### **POLICY:**


It is the Company’s policy to rely on the Ethics & Compliance Department to identify areas of compliance concern which should be documented as formal policies and procedures.

All compliance policies and procedures must adhere to the format in the template provided as Attachment A to this policy and must identify the following:

#### **PROCEDURE:**

##### ***Development of Policies and Procedures***

For areas of potential compliance risk, the Ethics & Compliance Department will determine if it is necessary to have corporate written guidance regarding a potential compliance risk. If corporate written guidance is required to prevent non-compliance, the Ethics & Compliance Department will identify whether there is an existing policy which addresses the potential compliance risk in question. If a policy does not exist, the Ethics & Compliance Department will proceed with developing a new policy to provide corporate guidance for the potential compliance risk.

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### ***Approval***

All policies and procedures must be reviewed and approved by the Chief Compliance Officer. Once approved by the Chief Compliance Officer, policies will be reviewed and approved as follows:

- A. Business segment policies will be presented to, reviewed and approved by the appropriate Compliance & Integrity Committee, Executive Compliance Committee and Compliance & Quality Committee of the Board.
- B. Enterprise policies will be presented to, reviewed and approved by the Executive Compliance Committee and the Compliance & Quality Committee of the Board.

### ***Implementation of Policies and Procedures***

The Ethics & Compliance Department will communicate information regarding new and/or revised policies to all affected individuals within 30 days of the approval date for the new and/or revised policies by posting to the appropriate business segment and/or enterprise website within 30 days of the approval date or otherwise emailing or communicating to affected individuals.

### ***Annual Review***

The Ethics & Compliance Department will review and update all policies when necessary in the normal course of its review of the Corporate Ethics & Compliance Program. At minimum, all policies and procedures will be reviewed on an annual basis.


### ***Revision of Policies and Procedures***

If it is determined a policy should be revised, the Ethics & Compliance Department will revise the policy and present the revised policy to the appropriate compliance committees as described under the Approval section of this policy.

### ***Retiring an Existing Policy***

From time to time, the Ethics & Compliance Department may determine that a policy is no longer needed. Upon making the determination that a policy should be retired, the Chief Compliance Officer will make a written request to the appropriate compliance committees, as outlined under the Approval section of this policy, before retiring the policy.

## ATTACHMENT A

 <b>Envision</b> HEALTHCARE — PIONEERING THE DELIVERY OF CARE —	Policy No.: X		
	Created: XX/XXXX	Reviewed: XX/XXXX	Revised: XX/XXXX

### **POLICY TITLE**

ETHICS & COMPLIANCE DEPARTMENT

### **SCOPE:**

List a description of the affected facilities, departments and functions.

### **PURPOSE:**

Provide a general statement describing the intent of the policy and procedure.

### **POLICY:**

Provide a description of the policy.

### **PROCEDURE:**

Provide a description of the principle tasks required for the functionality of the policy.