

 Envision HEALTHCARE — PIONEERING THE DELIVERY OF CARE —	Policy No.: 4		
	Created: 6/2006	Reviewed: 8/2019	Revised: 8/2019

EXECUTIVE COMPLIANCE COMMITTEE POLICY

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all members of the Envision Healthcare Executive Compliance Committee (the “ECC”). 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:

Although it is the responsibility of all colleagues and companies within the Envision Healthcare (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 management personnel to have primary responsibility 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 Healthcare Executive Compliance Committee

The Executive Compliance Committee’s responsibilities include:

- Confirming the proper evaluation and response to ethical and regulatory issues and concerns.
- Reviewing and revising 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 colleagues.
- 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.
- Developing and publicizing a confidential reporting system that enables colleagues and contractors to report improper conduct without fear of retaliation.

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Members of the ECC include, but are not limited to, the Chief Executive Officer, Chief Financial Officer, General Counsel and the Company’s 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 & Quality Committee of the Board of Directors. The CCO has a working relationship with senior management, legal counsel, and departmental managers and is available to all colleagues and clients.

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 colleagues 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 Healthcare initiatives and establishment of quality monitoring initiatives that address any specific areas. Additionally, the CCO, or designee, works closely with the department heads to review results of audits and direct revision/updates in departmental processes based on quality reviews. The results of quality monitoring initiatives and any compliance issues raised by colleagues or

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contractors through voluntary reporting mechanisms are submitted on a quarterly basis to the Envision Healthcare 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 Healthcare Compliance & Quality Committee of the Board of Directors.

POLICY REVIEW

The Ethics & Compliance Department will review and update this policy in the normal course of its review of the Company’s Ethics & Compliance Program.