	Ethics & Compliance Department		
envision	**Policy No.: 17**	**Created:**	08/2019
		Reviewed:	06/2025
		Revised:	

POLICY AND PROCEDURE DEVELOPMENT

SCOPE:

Applies to all Envision Healthcare teammates. For purposes of this policy, all references to "teammate" or "teammates" include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

Envision Healthcare and its subsidiaries and affiliates ("Envision" or "the Company") has adopted this Policy and Procedure Development policy to establish protocols for the development, implementation, review, and revision of Envision Code of Business Conduct and Ethics (the "Code") as well as 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.

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.

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 presented to, reviewed, and approved by the Executive Compliance Committee and the Compliance and Quality Committee of the Board.

Implementation of Policies and Procedures

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

Annual Review

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

Revision of the Code of Business Conduct and Ethics or Policies and Procedures

If it is determined the Code or a policy should be revised, the Ethics & Compliance Department will revise the Code or policy and present the revised Code or 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.

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.

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POLICY TITLE

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 principal tasks required for the functionality of the policy.

POLICY REVIEW

Include language regarding the review process and cadence.