



# ▶ VITAL SIGNS

Code of Business Conduct and Ethics

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# LETTER FROM THE CHIEF EXECUTIVE OFFICER



As a national medical group caring for more than 30 million patients each year, every Envision teammate — whether they provide direct patient care or support those who do — has a significant role in reflecting who we are and how we work. We are all responsible for demonstrating a commitment to the highest standards of integrity, honesty and compliance with the law.

Our code of conduct is an important part of this commitment. More than a set of legal requirements, the Code of Conduct is a translation of our values. The standards, policies and rules that make up the Code are at the core of Instilling Trust, our value that calls on us to do the right thing for our patients and each other.

When we dedicate ourselves to upholding these responsibilities, we build trust within our organization, our communities and with those who place their lives in our hands.

Thank you for conducting yourself in a way that will help keep millions of people and hundreds of communities across the country healthy and safe. And thank you for helping us fulfill our vision to be America's leading medical group.

Sincerely,

**Jason Owen**

President and Chief Executive Officer

# A MESSAGE FROM THE ETHICS & COMPLIANCE DEPARTMENT

This Code of Business Conduct, Vital Signs, is an important component of Envision Healthcare's Ethics and Compliance Program. By adhering to the Code, you are helping us act on one of our greatest company values: Instill Trust, which strengthens our commitment to do the right thing for each other, our partners, and our patients, who place their trust in us every day. Our objective is for all Envision teammates to act with the utmost integrity and do the right thing, even when nobody is watching. Our intent in developing the Code was not only to document the Company's legal and ethical compliance requirements but also to encourage each one of us to think regularly about our actions and the consequences of our behavior in the workplace. This will help promote and develop strong business leaders that will continue to uphold the Company's commitment to ethics and legal compliance.

Vital Signs provides information about our business standards and the laws and regulations that apply to our Company's activities. Each one of us is responsible for following the policies in this Code and for seeking guidance and direction when unsure of the propriety of any course of action. Compliance with these business standards and the laws and regulations that apply to our Company's activities is not optional — it is mandatory.

While it is impossible to include the full body of applicable law in this document, Vital Signs provides guidance for expected ethical behavior. As many issues included in this Code are broad and complex, we will attempt to provide additional guidance through a variety of means, including training and education, policies and procedures, and direction from managers, supervisors and legal counsel.

Be alert and sensitive to situations that could result in improper, unethical or illegal conduct. If you have any questions about the information in Vital Signs or if you have any questions about any compliance-related issue, you should:

- **Consult Vital Signs**
- **Speak to Your Supervisor**
- **Contact the Ethics & Compliance Department** at 615.787.2160
- **Call the Ethics & Integrity Compliance Helpline** at 877.835.5267, which is available 24 hours a day, seven days a week

Compliance is a shared activity by everyone, regardless of position or work location. Envision Healthcare expects all teammates to observe high standards of business and personal ethics in performing their work. Whatever your role is, your behavior communicates your standards to others and your expectations for them to observe the same high standards.

Thank you for your commitment to the ethical values critical to the Company's reputation and success.

## The Ethics & Compliance Department



### CODE OF BUSINESS CONDUCT AND ETHICS

**Q:** I already reviewed a Code of Business Conduct and Ethics upon hire and completed the related training course. Why do I have to read this again and complete another training course?

**A:** Compliance with the Code of Business Conduct and Ethics is a condition of employment at the time of hire and throughout your employment with the Company. The Code is reviewed and revised by the executive management team on a periodic basis. Therefore, these refresher training sessions are conducted to serve as a reminder that we all understand our responsibility to do the right thing the right way.

### NOTES:

- (1) Vital Signs is not, and may not be construed as, a contract of employment or any other type of contract or an assurance of continued employment.
- (2) In order to make reading the Code a little easier, we have used the term teammate(s) to refer to temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors and the term Company to refer to Envision Healthcare Corporation and any of its subsidiaries, or companies managed by them.

# WE ACT RESPONSIBLY TOWARD EACH OTHER AND OUR PATIENTS/CUSTOMERS

## FOLLOWING AND USING THE CODE

This Code has been named Vital Signs as a reminder to continually monitor and check our own workplace behavior against the standards set by the Code. Vital Signs has been approved by the Board of Directors and is considered a vital part of our Company's integrity. Everyone — all members of our workforce, including temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors of the Company and its subsidiaries and managed entities, as well as consultants and contractors providing services for these entities — must support the Company's efforts to comply with laws and maintain ethical standards.

The Code is made up of the key compliance policies that apply to all of us. We have tried to include as much compliance guidance as possible to assist you when faced with potential compliance questions. However, no one document can possibly cover every issue. Many of the policies set forth in this Code are further addressed in operational policies and procedures. In addition, please remember that the Ethics & Compliance Department and management are available to help you.

Compliance with the Code is mandatory. Any violation of the Code may result in corrective action, up to and including termination. Teammates who are aware of Code violations and fail to report the violations to the Company may also be subject to corrective action.

## REPORTING SUSPECTED VIOLATIONS

If you believe or suspect a violation has been committed, it is your duty to report your concern. The first person you may want to talk with is your supervisor. If, however, you are uncomfortable going to your supervisor, you should contact the Ethics & Compliance Department by calling 615.787.2160.

We have also established the Ethics & Integrity Compliance Helpline at 877.835.5267, which is available 24 hours a day, seven days a week, where you may report potential issues anonymously. Confidentiality will be maintained to the extent it is possible to do so. There will be no retaliation for raising good faith concerns regarding possible improper conduct.

## FOSTERING A COMPLIANT WORKFORCE

Envision Healthcare's supervisors and managers have a responsibility to ensure a commitment to compliance with our policies, this Code and federal and state laws and regulations. Supervisors and managers are expected to maintain an open line of communication with teammates in which concerns can be reported and addressed without fear of retaliation.

## INVESTIGATING SUSPECTED VIOLATIONS AND PROHIBITING RETALIATORY BEHAVIOR

We are committed to making sure that compliance issues receive sufficient and appropriate attention. Every call, question, or concern is taken seriously. It is the Company's policy to review, investigate and address reported concerns so that we can ensure that our conduct is compliant with relevant laws and so that we can promptly correct any problem. The Company prohibits retaliation against anyone who raises a good faith legal or ethical issue or participates in a compliance investigation. "Getting even" behavior will never be tolerated.



## COMPLAINT RESOLUTION

**Q:** What if I am not satisfied with the resolution of a complaint I placed to the Helpline?

**A:** There may be times that an investigation and resolution to a situation does not result in an action you would have expected because the Company may have determined the issue raised is not contrary to Company policy. Additionally, there are times when resolution to a concern is confidential in nature and the specific details of the investigation are not shared. If you continue to have concerns after a resolution has been provided, please report your continued or additional concerns back to the Helpline for additional review.

# WE ACT RESPONSIBLY TOWARD EACH OTHER AND OUR PATIENTS/CUSTOMERS (CONT.)

## PROVIDING QUALITY SERVICES

Envision Healthcare and its subsidiaries are committed to providing quality healthcare services through exceptional leadership backed by comprehensive back-office support that allows our caregivers to focus on patient care. Anyone who has a concern regarding the safety or quality of care provided to patients may report these concerns to a Supervisor, a Medical Director or Risk Management.

## RESPECTING PATIENT RIGHTS AND PRIVACY

We respect the confidential nature of our patients' personal information. Therefore, we must comply with all confidentiality and privacy policies, procedures and federal and state privacy laws, such as the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Generally, unless otherwise permitted or required by law, we must not use or disclose patient health information without the patient's authorization. The laws concerning the privacy and security of health information are very broad and cover many of our business activities. We have adopted a number of policies and procedures directly related to these issues and have also developed a separate training program to address the specific privacy and security requirements adopted as part of HIPAA.

Patient issues should not be discussed in public areas or with non-authorized personnel. Do not speak to a patient in front of family or friends regarding their past medical

history, diagnoses or conditions, or medications without the patient granting permission, unless the patient is unable to provide such information due to his/her medical condition. In addition, patient information should never be left in unattended areas. Always consider how you would like others to handle your personal information.

Social media sites should be used responsibly. When posting comments to social media websites, teammates should be respectful, honest and accurate. Teammates should not post information that is related to confidential business transactions or in violation of HIPAA. Posting patient information or proprietary information is prohibited.

## MAINTAINING AN APPROPRIATE WORKPLACE ENVIRONMENT

The Company strives to comply with all laws, regulations and policies related to employment-related activities and expects its teammates to abide by these laws and regulations. The Company has a comprehensive set of Policies related to employment practices and compliance with employment-related laws and regulations that address issues such as diversity, harassment, workplace violence, substance abuse and health and safety. Please consult the Employee Handbook for applicable Company policies.



## WORKPLACE CONCERNS

**Q:** If I have concerns related to my workplace environment, can I call the Ethics & Integrity Compliance Helpline?

**A:** While all teammates are encouraged to work with his/her local management team and the People & Culture Department, a teammate can call the Helpline at any time. The Ethics & Compliance Department works in conjunction with other departments when issues are raised to the Helpline, as appropriate.

## PATIENT PRIVACY

**Q:** If a friend is treated by co-workers and I have access to the medical records, am I permitted to look at his/her medical records?

**A:** Access to ANY medical record should be done only if permitted by your job responsibilities. Accessing medical records out of curiosity is NOT permitted and could lead to disciplinary action.

# WE STRIVE TO COMPLY WITH LAWS AND REGULATIONS

The healthcare industry is highly regulated. All individuals must abide by the laws and regulations impacting the healthcare industry or be subject to disciplinary action up to and including employment and/ or contract termination. While the Company does not expect any single individual to understand all details of these very technical and complex healthcare laws, rules and regulations, you are expected to be knowledgeable about and comply with the laws and regulations that apply to your job responsibilities and to seek guidance when questions arise.

## ABIDING BY EMTALA

The Emergency Medical Treatment and Active Labor Act (“EMTALA”) and its state law equivalents regulate patient assessment and treatment at a hospital when the patient comes to the hospital with the belief that he or she has an emergency medical condition. EMTALA also includes specific rules regarding patient discharge and/or transfer. Many hospitals have specific rules and guidelines with respect to their EMTALA obligations. In addition to complying with the hospital policies, all hospital-based physicians must follow EMTALA by providing medical screening examinations and necessary stabilization to all patients, regardless of their ability to pay. All necessary financial information should be obtained after the patient has been stabilized. This information may also be obtained during care as long as no delay in care occurs. If you suspect an EMTALA violation might have occurred or receive notification of a possible violation, please contact your supervisor or the Ethics & Compliance Department.

## SUBMITTING ACCURATE CLAIMS FOR SERVICES

We must submit appropriate and accurate claims to all patients and third-party payors for medical services provided. The documentation and submission of thorough and accurate information regarding the patient encounter is imperative to ensure we seek reimbursement only for those services that are medically necessary and actually performed, and we may not submit claims for services that are excessive or otherwise not legally reimbursable. We also must not submit false, fraudulent or misleading claims to any payor. If you suspect improper billing — whether intentional or unintentional — you have an obligation to report your concern to your supervisor or the Ethics & Compliance Department.



## CLAIMS SUBMISSION

**Q:** If a medical record is incomplete and I think a service was provided but the documentation is not clear, can I bill based on my assumption?

**A:** The documentation of each patient encounter must be thorough and accurate. If you believe services were provided but they are not clearly documented, you may seek clarification but cannot bill based on an assumption that services were provided.

## MAINTAINING APPROPRIATE FINANCIAL RELATIONSHIPS WITH REFERRAL SOURCES

There are various state and federal laws governing patient referrals. Anti-kickback laws regulate offers, payments, solicitations and receipt of anything of value in exchange for referring, furnishing or recommending federally funded business. There are also state and federal laws governing patient referrals by physicians, such as the Stark Law. The Stark Law, when applicable, prohibits physicians from referring patients, reimbursable by federal funds, to an entity providing “designated health services” if the physician or a member of the physician’s immediate family has a financial relationship with the entity, unless an exception applies.

We may not offer, solicit or receive any type of compensation (including kickbacks, bribes or rebates) in return for referring, furnishing or recommending services to patients that are reimbursable by the federal government. Any questions should be directed to the Legal Department or Ethics & Compliance Department to determine whether the referral arrangement violates applicable law.

## INTERACTING WITH GOVERNMENT EMPLOYEES AND COOPERATING WITH GOVERNMENT INVESTIGATIONS

It is illegal to offer or give anything to a government official or employee in order to influence that government official or employee to use his/her government position and power to help the Company. Not only must we refrain from this activity, but we must also avoid the appearance of inappropriate influence. Teammates may not buy lunches, give gifts or do anything that directly or indirectly benefits government officials or employees for the purpose of influencing the government official or employee to use his or her position to help the Company. Any questions should be directed to the Legal Department or Ethics & Compliance Department.

It is Company policy to cooperate with government investigations. Both the Company and its teammates have the right to be represented by legal counsel during any government investigation or inquiry. This means that you have the right to have a company representative or an attorney present during questioning whether that questioning occurs during business hours or away from Company property. If you are contacted by a third party in connection with a government investigation, immediately contact the Legal Department or the Ethics & Compliance Department.

Sometimes, the Company receives a subpoena or other type of legal request for certain information. The Company has developed specific procedures for releasing information in response to subpoenas and legal inquiries. For legal reasons, it is very important that these procedures be followed. Any requests for information under these circumstances should be immediately directed to the Legal Department at [Legal@EnvisionHealth.com](mailto:Legal@EnvisionHealth.com).

## ALWAYS ACT WITH INTEGRITY BEFORE, DURING AND AFTER ANY INVESTIGATION

- Do not destroy documents or information in anticipation of a request for those documents from a government agency or court.
- Do not alter Company documents or records.
- Do not lie or make misleading statements to government investigators during any investigation.
- Do not pressure anyone to hide information or provide false or misleading information to government investigators.

### NOTES:

Documents and information include both paper and electronic forms of storage, such as computer files, e-mails, voicemails, etc.



### GOVERNMENT INVESTIGATIONS

**Q:** If I am approached by someone who is conducting a government investigation, does this mean I have done something wrong?

**A:** No. Government investigations can be routine and part of the government's auditing requirements or may be due to allegations of potential regulatory violations. It is important to be forthright and honest during any interview or other aspect of the investigation and remember that you have the right to have a company representative or an attorney present during any interview. Remember to immediately notify the Legal Department or the Ethics & Compliance Department of any government investigation or audit.



## PURCHASING GIFTS

**Q:** Can I expense gift cards bought for individuals who are not teammates of the Company?

**A:** Gift cards are considered cash equivalents and are inappropriate to provide to potential referral sources. Any questions related to appropriate gifts should be communicated to the Ethics & Compliance Department or the Legal Department prior to the purchase of said gifts.

## MAINTAINING ELIGIBILITY TO PARTICIPATE IN GOVERNMENT HEALTHCARE PROGRAMS

The federal government and many state and local agencies pay for some of the services that our Company provides to patients. Individuals and/or entities may be debarred or suspended from participating in federal or state programs for various reasons, including inappropriate use of federal or state funds. These individuals and/or entities are published on the “System for Award Management,” the Office of the Inspector General’s “List of Excluded Individuals/Entities” and/or individual State websites. The Company will not knowingly permit any individual or business, who is on the federal or state government’s excluded lists as debarred, suspended or otherwise ineligible, to provide services for the company.

We take proactive steps to check the government’s list of excluded and debarred providers to ensure that no teammates have been placed on any exclusions list during employment. Teammates have a duty to inform the Company of any change in their eligibility to participate in government programs. Consultants and contractors must also be eligible to contract with the Company and must operate in accordance with our Code of Business Conduct that governs ethical corporate behavior and that prevents the hiring of, or contracting with, excluded, debarred, or ineligible persons or entities.

It is the responsibility of our caregivers to maintain all required credentials, licenses and certifications. We do not allow caregivers with lapsed or revoked credentials to provide care to patients.

## DEALING FAIRLY WITH OTHERS AND ENGAGING IN APPROPRIATE MARKETING ACTIVITIES

The Company is committed to fair competition and to honest dealing with customers, suppliers, competitors and teammates. Teammates shall not engage in unethical business practices as a means to win business, such as stealing trade secrets or proprietary information from competitors, offering bribes or kickbacks, or harassing a competitor’s employees. Teammates must be cognizant of applicable United States laws, including the Foreign Corrupt Practices Act, and host-country laws that have an impact upon how we conduct business. We prohibit the payment of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector. We will market our services honestly and adhere to antitrust and trade regulations that encourage competition.

# WE AVOID CONFLICTS OF INTEREST

## LIMITING ACCEPTANCE OF INAPPROPRIATE GIFTS OR OTHER BENEFITS AND MAINTAINING APPROPRIATE OUTSIDE FINANCIAL INTERESTS

Business decisions must always be made in the best interests of the Company and not motivated by personal interest or gain. Teammates should not participate in any activities or enter into relationships that conflict or appear to conflict with their Company responsibilities. It is a conflict of interest for a teammate to make any profit or personal gain as a result of his or her position with the Company, apart from the Company's compensation and benefits programs. Company teammates shall not be used to help with personal business during business hours. Teammates must avoid, and promptly disclose, potential conflicts of interest. Waivers or exceptions to any conflict of interest must be approved in writing by the Ethics & Compliance Department.

## SOME EXAMPLES OF POSSIBLE CONFLICTS OF INTEREST INCLUDE THE FOLLOWING:

- Awarding business to a consultant or entity owned or controlled by a family member
- Owning (or possessing a significant ownership interest in) an entity that is a competitor or supplier of the Company
- Providing company charitable contributions to entities where a teammate or family member has an interest
- Receiving loans or guarantees of an obligation from a customer or vendor
- Accepting a gift that influences a decision with respect to a specific vendor or customer
- Requesting a teammate to assist with personal business on company time

## KEEPING PERSONAL POLITICAL ACTIVITIES SEPARATE FROM COMPANY ACTIVITIES

It is important to keep your personal political activities separate from Company activities. The Company has specific procedures regarding all political contributions and those procedures must be strictly followed in order to comply with laws that restrict the use of Company funds, property and services in connection

with elections. Teammates must receive prior approval by the Government Affairs Department for any political activity or contributions that could be characterized as sponsored or supported by the Company. Examples can include using work time or Company resources on political campaigns.

No type of political contribution should ever be included on any expense account. For example, in general, the cost of fundraising and/or tickets for political functions is considered a political contribution and, therefore, may not be included on expense reports, even if business is discussed.

Under no circumstances are local petty cash funds, or other Company funds to be used for contributions to federal, state or local political campaigns.



### CONFLICTS OF INTEREST

**Q:** I am in a position to decide which vendor receives a contract from the Company. My spouse owns one of the businesses bidding for the contract. Is it a conflict of interest to participate in the decision-making process?

**A:** Yes, it is a conflict of interest for you to use your position within the Company to influence decisions that would directly or indirectly allow you or a family member to profit from those decisions. For example, if you, a family member or close personal friend own a business that either currently provides services to the Company or is bidding to provide services to the Company, it would be viewed as a potential conflict of interest for you to be involved in the decision-making process to hire them due to the possibility that your decision may also provide you with personal monetary gain.

# WE PROTECT COMPANY PROPERTY

## USING COMPANY PROPERTY

Company property, as a general rule, should only be used to further the Company's business, unless you receive prior approval for another use by your manager. When we refer to Company property, we mean all the resources we use to conduct our business, such as the physical spaces and facilities, materials, supplies, equipment, telephones, copying machines, computers, services that the Company pays for to support its activities and Company information that we use to do our jobs.

Company property should be used wisely and never needlessly wasted. We also need to take precautions to protect it from misuse or theft. In order to ensure that property is being used in compliance with our policies and the law, the Company retains the right to access Company property at any time, without notice. This means that we may take actions such as monitoring, opening, inspecting or copying any Company property, including accessing electronic communications transmitted or received through the Company's systems.

## SAFEGUARDING CONFIDENTIAL AND PROPRIETARY INFORMATION AND TRADE SECRETS

The Company continually makes modifications to its systems and technology and, in doing so, modifies and/or establishes new policies and procedures to ensure compliance with laws and regulations. Much of the information that teammates have access to and use in the course of business has been developed by or for the Company and is extremely valuable and necessary in helping the Company operate successfully. This information, including our trade secrets, is confidential and proprietary and generally is not available to others.

Examples of confidential or proprietary information are pricing structures, contract terms, proposals, business plans, processes, personnel information, customer or patient information, passwords and other information that either the Company has not released publicly or which is copyrighted and not available for use by other companies.



### PROPRIETARY INFORMATION

**Q:** I recently developed educational materials as part of my job responsibilities. Can I post them on a personal website for anyone to view?

**A:** All work product you create in the course of conducting Company business is the property of the Company. The Company hired and paid you for your knowledge, experience and creativity. Anything that you have created for the Company cannot be used elsewhere without the Company's prior permission. The information is proprietary, and any questions related to such information should be directed to the Ethics & Compliance Department or Legal Department.

This type of information should never be disclosed to other individuals or entities outside of the Company. If you have any questions regarding whether information is confidential or proprietary, you should contact your manager or the Legal Department prior to disclosing it.

By its very nature, confidential information is compromised if it is made public. Therefore, the requirement to safeguard this type of information remains an ongoing obligation, even if your employment with the Company ends.

# WE PROTECT COMPANY PROPERTY (CONT.)

## KEEPING ACCURATE BOOKS, RECORDS AND REPORTS ABOUT THE COMPANY OR PATIENTS

The Company's books, records and reports must be truthful and accurate and must be maintained in compliance with Company policy and federal, state and local laws. The failure to maintain accurate books, records and reports may expose the Company and its teammates to significant civil damages, substantial criminal fines and other penalties. We expect every teammate to take responsibility for the integrity of information that is included in business documents, whether that information is financial, operational, statistical or other business data. You must not intentionally enter, record or report false, misleading or inaccurate information. It is the responsibility of the clinician to ensure that our medical records are clear and complete and that they accurately reflect the care that was provided to a patient. Teammates must not exaggerate or lead others to document events in an inappropriate way.

Teammates are expected to cooperate fully with any compliance investigation and with both internal and outside auditors. Cooperation is defined as providing unrestricted access to the books and records, as well as source documents related to any review conducted at the direction of the Ethics & Compliance Department or the Internal Audit Department. Under no circumstance should any teammate, on his or her own or under the direction of a director, officer or other teammate, take any action to coerce, manipulate, mislead or fraudulently influence any member of the Ethics & Compliance Department, Legal Department, internal auditors or outside auditors.

All complaints regarding accounting, internal accounting controls, auditing and other financial matters from any source are received, retained and investigated by the Ethics & Compliance Department and Internal Audit Department and reported to the Board of Directors or a committee thereof.



### CONFIDENTIAL INFORMATION

**Q:** I generate a report on a routine basis. This report contains personal information such as name and Social Security number. I do not need to retain it. How should I discard it?

**A:** Unless management has instructed you to retain all documents (paper and electronic) as a result of a government/internal investigation or legal hold, the report should be retained or discarded in accordance with the Company's document retention policy. Hard copies of confidential documents that are discarded should be shredded or destroyed so that the information contained in the report cannot be reconstructed.



### RESTRICTING USE OF INSIDE INFORMATION

We shall comply with all applicable federal and state security laws relating to buying or selling stock in our Company. In the normal course of business, we may become aware of material, non-public information (Inside Information) regarding the Company, as well as other companies with which we do business. For questions regarding Inside Information, contact the Legal Department.

### INSIDER TRADING IS STRICTLY PROHIBITED

- A:** Insiders, members of their immediate families or any trusts over which the Insider has control may not buy or sell Envision Healthcare securities or securities of any publicly held company while in possession of Insider Information obtained during the course of employment. This prohibition applies even if the decision to buy or sell is not based on the Inside Information. “Insiders” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors of the Company as well as the Company’s outside advisors, agents, contractors and other third parties with access to Inside Information.
- B:** Insiders in possession of Inside Information may not (a) disclose the Inside Information to anyone other than those individuals associated with the Company who need to know the information to conduct their job duties or (b) offer tips, opinions or recommendations regarding Inside Information to any other individual, including family members, friends, vendors, suppliers or customers, who may trade Envision Healthcare securities or any publicly held company. Even outside of the trading context, Insiders are required to maintain the confidentiality of Company information.

# ACKNOWLEDGMENT AND CONFLICTS OF INTEREST DISCLOSURE FORMT

I certify that I have received a copy of Vital Signs – Envision Healthcare’s Code of Business Conduct and Ethics. I have read Vital Signs and I understand that it outlines my responsibilities as a temporary, part-time and/or full-time employee independent contractor, clinician, officer or director (as applicable) of the Company.

I agree to fully comply with the Company’s standards, policies and procedures.

I understand that I have an obligation to report any suspected violation of the Company’s standards, policies and procedures.

I understand that the Company has provided me with access to a toll-free Ethics & Integrity Compliance Helpline number to answer any questions I may have and/or allow me to report any suspected violations of this Code of Business Conduct and Ethics.

I will report any known or perceived violations of the Code to my supervisor or the Ethics & Compliance Department as soon as possible but without unreasonable delay.

I further certify that I have read and understand the Code of Business Conduct and Ethics section entitled CONFLICTS OF INTEREST and that ...

\_\_\_\_\_ I have no conflicts of interest.

\_\_\_\_\_ I request assistance in determining whether I have a conflict of interest.

If you checked the last option, please describe below.

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Please sign and return this form to your supervisor or manager. It will be sent to the Ethics & Compliance Department and a copy will be placed in your personnel file.

Name (Print): \_\_\_\_\_

Company: \_\_\_\_\_

Position Title: \_\_\_\_\_

Last four digits of SS#: \_\_\_\_\_

Employee ID#: \_\_\_\_\_

Location: \_\_\_\_\_

Signature: \_\_\_\_\_

Today’s Date: \_\_\_\_\_



877.835.5267 | [EnvisionHealth.com](https://www.EnvisionHealth.com)  
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