

	Ethics & Compliance Department	
	Policy No.: 114	Created: 05/2018
		Reviewed: 06/2025
		Revised:

FACILITY CONTRACTS REVIEW AND APPROVAL PROCESS

SCOPE:

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

PURPOSE:

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Facility contracts policy to outline a written review and approval process for all Facility contracts to ensure that all new and existing or renewed Facility contracts do not violate the Anti-Kickback Statute.

POLICY:

A legal review of all Facility contracts by counsel with expertise in the Anti-Kickback Statute will occur for all new, existing, and renewing Facility contracts to ensure their compliance with the Anti-Kickback Statute.

PROCEDURES:

Legal Review

Any new, existing, or renewing Facility Contract will be sent to legal counsel for review. The legal review will take place before any further action is taken on the new, existing, or renewed Facility Contract. No Facility Contract shall be instituted until the final legal review has been performed and written approval is provided. The review will include identification of the business need or rationale for all Facility contracts. The review will also ensure that each existing, new, or renewal Facility Contract does not violate Anti-Kickback Statute, or the regulations, directives, and guidance related to this statute. A process will be in place to determine and document the fair market value of the remuneration specified in the Facility Contract (if applicable). All Facility contracts will be tracked in the centralized Facility contracts tracking system to include any modifications or updates to the Facility contracts.

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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.