

	Ethics & Compliance Department	
	Policy No.: 18	Created: 06/2015
		Reviewed: 06/2025
		Revised: 10/2022

BUSINESS COURTESIES TO POTENTIAL REFERRAL SOURCES

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 Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Business Courtesies to Potential Referral Sources policy to assist teammates of the Company in complying with applicable laws and regulations relating to sales and marketing practices at the Company and to establish parameters for any extension of any business courtesies.

This Policy governs interactions with applicable consumers, existing Company sources of patient referrals as well as those sources of referrals with whom the Company is not currently doing business, but who may become Company sources of referrals. As this Policy cannot address all situations that may arise, this Policy also is intended to educate teammates so they can recognize practices that are permissible, practices that are prohibited, and practices for which teammates should seek additional guidance from their supervisor and/or the Company’s Legal Department or Ethics & Compliance Department before proceeding.

POLICY:

It is unlawful to offer anything of value to a consumer, referral source, or potential referral source, in order to influence that consumer, referral source, or potential referral source to select the Company’s products or services for their patients. For more information, see the Company’s *Overview of Relevant Laws* policy.

PROCEDURE:

A teammate may extend or accept a business courtesy to or from a customer or potential referral source only if the business courtesy:

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- i. Falls within the guidelines of this Policy;
- ii. Is not a cash or cash equivalent, such as gift certificates/cards, vouchers, or checks;
- iii. Is not determined in any manner that takes into account the volume or value of referrals or other business generated by the referral source; and
- iv. Is not solicited by the potential referral source.

Business Courtesy Request and Approval Process

Any business courtesy requests that are not Authorized Business Courtesies as described below, and exceed nominal amounts, must be reviewed and approved on a case-by-case basis by the Chief Compliance Officer, or designee, prior to purchase and distribution.

Authorized Business Courtesies

The following are considered acceptable business courtesies:

- Greeting cards;
- Refreshments (coffee, tea, or snacks)
- Small items with the Company’s logo such as coffee mugs, pens, notepads, key chains, calendars, and kitchen magnets; and
- Other items specifically approved in writing by the Ethics & Compliance Department.

Marketing

- Marketing and Business Development personnel must explain accurately what Company services may be covered depending upon key facts and circumstances and should not market the Company’s services as being “medically necessary”.
- Marketing personnel shall only use marketing and training materials which have been approved by the Company’s Legal Department and/or Ethics & Compliance Department.

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.