

# VITAL SIGNS

## Code of Business Conduct and Ethics



# TABLE OF CONTENTS

<b>Letter from the Chief Executive Officer .....</b>	<b>3</b>
<b>A Message from the Ethics &amp; Compliance Department .....</b>	<b>4</b>
<b>We Act Responsibly Toward Each Other and Our Patients/Customers .....</b>	<b>5</b>
Following and Using the Code	
Reporting Suspected Violations	
Fostering a Compliant Workforce	
Investigating Suspected Violations and Prohibiting Retaliatory Behavior	
Providing Quality Services	
Respecting Patient Rights and Privacy	
Maintaining Appropriate Workplace Environment	
<b>We Strive to Comply with Laws and Regulations .....</b>	<b>7</b>
Abiding by EMTALA	
Submitting Accurate Claims for Services	
Maintaining Appropriate Financial Relationships with Referral Sources	
Interacting with Government Employees and Cooperating with Government Investigations	
Maintaining Eligibility to Participate in Government Healthcare Programs	
Dealing Fairly with Others and Engaging in Appropriate Marketing Activities	
<b>We Avoid Conflicts of Interest .....</b>	<b>10</b>
Limiting Acceptance of Inappropriate Gifts or Other Benefits and	
Maintaining Appropriate Outside Financial Interests	
Keeping Personal Political Activities Separate from Company Activities	
<b>We Protect Company Property .....</b>	<b>11</b>
Using Company Property	
Safeguarding Confidential and Proprietary Information and Trade Secrets	
Keeping Accurate Books, Records and Reports about the Company or Patients	
Restricting Use of Inside Information	
<b>Acknowledgment and Conflicts of Interest Disclosure Form .....</b>	<b>14</b>



## LETTER FROM THE CHIEF EXECUTIVE OFFICER

Envision Healthcare's mission is to improve life in our communities one moment at a time. We carry out this commitment by being the leader in innovating, integrating and optimizing the continuum of care to benefit patients everywhere. Envision Healthcare and its subsidiaries (collectively "Envision Healthcare"), has embraced the following Code of Business Conduct and Ethics, titled Vital Signs, as the foundation for conducting business both legally and ethically.

Vital Signs provides policy statements that address work place activities vital to the health of the Company's operations. Each policy within describes what is expected and gives guidance to help meet both legal requirements and our internal ethical expectations. Vital Signs applies to all of us. We must all adhere to the specific policies. While Vital Signs does not cover every situation, or set forth every applicable rule, it does describe corporate and regional policies, practices, and procedures, as well as common-sense standards and our personal commitment to ethical responsibility.

You are required to be familiar with and understand the Code of Business Conduct and Ethics policies, as violation of these principles may subject you to corrective action and/or termination of your employment or engagement. Therefore, we encourage you to use Vital Signs as a reference resource whenever necessary. Your supervisor can assist you with any questions or concerns. If you do not feel comfortable approaching your supervisor, you may contact the Ethics & Compliance Department or if you prefer to report an issue anonymously, call the Ethics & Integrity Compliance Helpline number at (877) 835-5267. We are committed to working diligently to ensure that questions and issues brought to the attention of the Ethics & Compliance Department directly or through the Helpline will be kept confidential to the degree possible and that there will be no retaliation for asking questions or raising good faith concerns regarding possible improper conduct.

Because it is important that our words reflect our actions, it is essential that we all read, understand and follow the ethical guidelines communicated within Vital Signs. While no formal guidance can replace an individual's sense of good judgment, Vital Signs should help you evaluate and address most issues in order to maintain honest and ethical conduct. Our continuing success is dependent upon maintaining our commitment to compliance with all applicable federal, state, and local laws and regulations governing appropriate delivery of high quality health care services.

Thank you for your support and your commitment to continually choosing to do the right thing...the right way.

Sincerely,

A handwritten signature in black ink that reads "Chris Holden". The signature is stylized and includes a long horizontal flourish extending to the right.

Chris Holden  
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. The Ethics & Compliance Department's mission is "to advance operational goals by promoting ethical leadership and providing compliance guidance." We achieve this mission by implementing ethical responsibility within the Envision Healthcare organization. Our objective is for all Envision colleagues 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 regularly think about our actions and the consequences of our behavior in the work place. We hope in so doing, that we can 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  
(615) 922-6125
- 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 colleagues 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

## Q & A: 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 colleague(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. Colleagues who are aware of Code violations and fail to report the violations to the Company may also be subject to corrective action.

A waiver of this Code for any executive officer or director may be made only by the Board of Directors or a committee of the Board of Directors.

## Q & A: 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.

## 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) 922-6125.

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 colleagues in which concerns can be reported and addressed without fear of retaliation.

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

### 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.

### Providing Quality Services

Envision Healthcare and its subsidiaries are committed to providing quality healthcare services through exceptional leadership backed by comprehensive back-office support which allows our caregivers to focus on patient care. Any caregiver who has a concern regarding the safety or quality of care provided to patients may report these concerns to a Supervisor, 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, colleagues should be respectful, honest and accurate. Colleagues should not post information that is related to confidential business transactions or in violation of HIPAA. Posting patient information or proprietary information is prohibited.

### Q & A: 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.

### Maintaining an Appropriate Workplace Environment

The Company strives to comply with all laws, regulations and policies related to employment-related activities and expects its colleagues 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.

### Q & A: WORKPLACE CONCERNS

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

**A:** While all colleagues are encouraged to work with his/her local management team and Human Resources Department, a colleague 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.

## 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.

### Q & A: 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 any 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 STRIVE TO COMPLY WITH LAWS AND REGULATIONS (CONT.)

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 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, we must also avoid the appearance of inappropriate influence. Colleagues 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 colleagues 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

#### NOTE:

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

### Q & A: 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.



## WE STRIVE TO COMPLY WITH LAWS AND REGULATIONS (CONT.)

### 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 colleagues have been placed on any exclusions list during employment. Colleagues 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 which precludes the hiring of 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 colleagues. Colleagues 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. Colleagues 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.

#### Q & A: PURCHASING GIFTS

**Q:** Can I expense gift cards bought for individuals who are not colleagues 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.

## 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. Colleagues 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 colleague 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 colleagues shall not be used to help with personal business during business hours. Colleagues must avoid, and promptly disclose, potential conflicts of interest. Waivers or exceptions to any conflict of interest must be approved in writing by the General Counsel.

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

- Awarding business to a consultant or entity owned or controlled by a family member
- Owning (or possessing a significant ownership interest in) an entity which is a competitor or supplier of the Company
- Providing company charitable contributions to entities where a colleague 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 coworker 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. Colleagues 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 fund-raising 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, draft accounts or other Company funds to be used for contributions to federal, state or local political campaigns.

### Q & A: 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, generally 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, vehicles, telephones, copying machines, computers, the services that the Company pays for to support its activities and the 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 enhance its electronic 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 colleagues 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.

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.

### Q & A: 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.

## 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 colleagues to significant civil damages, substantial criminal fines and other penalties. We expect every colleague 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 caregiver to ensure that our medical records are clear and complete and that they accurately reflect the care that was provided to a patient. Colleagues must not exaggerate or lead others to document events in an inappropriate way.

Colleagues 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 colleagues' 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 colleague, on his or her own, or under the direction of a director, officer or other colleague, 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.

### Q & A: 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.

## WE PROTECT COMPANY PROPERTY (CONT.)

### 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 the 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.



## A MESSAGE FROM THE ETHICS & COMPLIANCE DEPARTMENT

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 this box please describe below.

---



---



---



---

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 | [www.evhc.net](http://www.evhc.net)

540829\_EVHC\_CodeofConduct

© 2019 Envision Healthcare — All rights reserved.