

	Ethics & Compliance Department	
	Policy No.: 114	Created: 05/2018
		Reviewed: 05/2023
	Revised:	

FOCUS ARRANGEMENTS REVIEW AND APPROVAL PROCESS

SCOPE:

Applies to all Envision Medical Group (“EMG”) 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 and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Focus Arrangements policy to outline a written review and approval process for all Focus Arrangements to ensure that all new and existing or renewed Focus Arrangements do not violate the Anti-Kickback Statute.

POLICY:

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

PROCEDURES:

Legal Review

Any new, existing, or renewing Focus Arrangement 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 Focus Arrangement. No Focus Arrangement 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 Focus Arrangements. The review will also ensure that each existing, new, or renewal Focus Arrangement 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 Focus Arrangement (if applicable). All Focus Arrangements will be tracked in the centralized Focus Arrangements tracking system to include any modifications or updates to the Focus Arrangements.

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.