ARTIVION, INC.
FOREIGN CORRUPT PRACTICES ACT POLICY

KEY POLICY POINTS

The Foreign Corrupt Practices Act ("FCPA") criminalizes bribery of foreign officials by prohibiting:

- any payment or promise of anything of value;
- given to wrongfully influence any business decision; and
- delivered, directly or indirectly, to any Foreign Official, which includes all representatives and employees of foreign governments (which often includes foreign doctors).
- There is one exception and two limited legal defenses.
- The FCPA also requires publicly traded companies, including Artivion, to maintain books and records that accurately reflect transactions and dispositions of assets and to maintain an adequate system of internal accounting controls.

You must contact a member of the legal department before offering or providing anything of value to a foreign individual.

POLICY

The FCPA prohibits the bribery of foreign officials and requires publicly traded companies, including Artivion, to maintain internal accounting controls and keep books and records that accurately reflect all of their transactions and dispositions of assets and to maintain an adequate system of internal accounting controls.

In general, *the FCPA prohibits any payments, defined broadly, as anything of value, given to wrongly influence a business decision if any part of that payment will be offered, given, or promised, directly or indirectly, to a Foreign Official*. This is a broad statute, and it captures almost any effort to provide a benefit to a person who is associated with a foreign government in order to gain a business advantage. Local anti-corruption laws in other countries may be even more restrictive.

All Company officers, directors, employees, and agents (including our distributors, consultants, representatives, and brokers), including those of our subsidiaries, must comply with the FCPA, as well as with all local anti-bribery and anti-corruption laws. It is not permissible to use personal funds to do what is otherwise prohibited by the FCPA.

Every officer, director, employee, and agent of the Company whose duties are likely to lead to exposure to international business activities is required to read, understand, and comply with this FCPA Policy (this "Policy").

Sanctions for violations of the FCPA can be quite severe and such sanctions are not covered by the Company's Directors and Officers Insurance, and officers, directors, employees, and agents typically will not be indemnified by the Company for such violations.

The Company takes its obligations to comply with the FCPA seriously. Accordingly, employees and agents (including our distributors, consultants, representatives, and brokers) who fail to follow the Company's Policy and FCPA procedures, whether expressly stated in this Policy or otherwise, may be subject to adverse action, including additional training, and where warranted, termination.

The operative prohibition of the FCPA is to prohibit the corrupt offer or payment of money or "anything of value" "directly or indirectly" to a "foreign official" in order to "obtain or retain business."

Given the breadth and complexities of the FCPA, you must contact a member of the legal department before offering or providing anything of value to a foreign individual or if you have any FCPA-related questions or concerns about a situation.

In applying the FCPA, the following terms mean:

- **"payments, including things of value"** – paying, offering or promising to pay, or authorizing the payment of money or anything of value. For example, giving cash in an envelope, a contribution to a customer's charity, a modest meal, event tickets, or reimbursement of travel expenses can all constitute a violation. The FCPA applies to payments of any size and things of any value.
- **"for a business purpose"** – the payment is intended to help the Company in its business pursuits – to help make a sale, obtain a discount, or win a new account, for example.
- **"if you know that any part of the payment will be offered, given, or promised"** – the mere offer or promise of a payment can constitute a violation of the FCPA.
- **"directly or indirectly"** – to the benefit of a Foreign Official (as defined below) indirectly, such as a donation to a charity of which the Foreign Official is connected or a gift to a member of the family of a Foreign Official. Importantly, it also means that the Company may be held liable under the FCPA for the actions of distributors acting on the Company's behalf when it knows, consciously disregards, or deliberately ignores a high probability that a third party will offer or provide something of value improperly.
- **"Foreign Official" –** officers, employees, and representatives of government departments or agencies or of any business that - is government-owned or government-controlled, *including many hospitals*. Many of the Company's customers are hospitals that are either government-owned or government-managed; therefore, their doctors, nurses, procurement officers, lab technicians, and other employees and agents are all Foreign Officials for the purposes of the FCPA. Foreign Official also includes any person acting in any official capacity for a foreign political party, foreign political candidate, or a public international agency. It can also include consultants for any of the above-listed entities.

There is one very specific exception to the FCPA under which a Company may not be held liable under the FCPA for a payment to a Foreign Official and two limited legal defenses.

1. Exception. Facilitating and Expediting Payments – payments to Foreign Officials to expedite or obtain routine government service that the officials already perform in the normal course of their duties – the Company does not allow facilitation payments;

2. Limited Legal Defense. Payments that are expressly and affirmatively stated by law to be legal in that country, although they must be properly recorded in financial records; and
3. Limited Legal Defense. Payment of bona fide and reasonable expenditures, such as travel and lodging, incurred by or on behalf of a foreign official and directly related to the promotion, demonstration, or explanation of products or services, or the execution or performance of a contract with a foreign government or agency.

The FCPA is very complex. In every instance in which you want to offer or provide anything of value to a Foreign Official, you must pre-clear that activity with the Company's Chief Compliance Officer at compliance@artivion.com.

You should also know that:

- The FCPA is enforceable for violations committed anywhere in the world;
- The Company can be held liable for the behavior of its agents (including employees, distributors, service providers, etc.) if they violate the FCPA; and
- Violations of the FCPA can result in civil and criminal penalties for both the individual and the Company.

Employees who have knowledge or a good faith suspicion of a violation of this Policy are required to report that information to the Company's Chief Compliance Officer at compliance@artivion.com, someone in the Company's Legal Department, or through the Company's compliance hotline (855.845.3467 and https://artivion.ethicspoint.com). Reporting in good faith means that you believe there may be a suspected violation of this Policy or law and you fully share with the Company information you believe to be true about the situation.

Failure to report your knowledge or good faith suspicion of an FCPA violation is a violation of the Company's Code of Conduct. The Company will not retaliate against a person for reporting in good faith an actual or suspected FCPA violation, even if the report cannot be substantiated or turns out to be wrong. Any person who retaliates against an employee who makes a good faith report may be subject to adverse employment action, up to and including, where warranted, termination. Only allegations made maliciously or in bad faith can subject a reporter to disciplinary action.

Compliance with the FCPA is both complex and not intuitive. Please review this Policy carefully, and, if you have any questions after doing so, contact the Chief Compliance Officer or a member of the legal department for further guidance.

August 2026