

Anti-Bribery Anti-Corruption Policy

I. Purpose

We strive to conduct our business in accordance with the highest ethical standards and in full compliance with the laws of the countries in which we operate, including the US Foreign Corruption Practices Act, the UK Bribery Act, Australia Commonwealth Crimes Act, and other anti-bribery, anti-corruption laws. These laws apply to conduct that occurs anywhere in the world. We do not bribe anyone, ever. We intend to do business only with those customers, distributors, suppliers, and other business partners who comply with the law and demonstrate high standards of responsible business.

II. Scope

This policy applies to all employees, officers, directors, and contractors of Saluda Medical, Inc. and its majority-owned subsidiaries (the “Company” or “Saluda”).

III. Policy

Saluda’s policy prohibits bribery of any kind. Do not offer, promise, provide, solicit, authorize, or accept “anything of value” in order to obtain or retain business, to secure an improper advantage, or to improperly influence anyone’s actions, whether they are a government official or not. Anything of value is broad and includes compensation beyond cash. It includes: cash equivalents (such as gift cards); securities; loans; travel, hospitality, gifts, or entertainment; offers of employment; political contributions; and charitable contributions or donations.

Special Considerations for Government Officials

We do not offer or promise anything of value to Government Officials, directly or through an intermediary, to induce action that would give Saluda an improper advantage or assist Saluda in obtaining or retaining business.

Facilitation Payments. Do not make facilitation payments, also known as “grease payments.” These payments are typically demanded by low-level officials in exchange for providing a service that is outside those ordinarily and commonly performed by the official.

Gifts. Only provide gifts for a legitimate business interest, and only when they are reasonable and customary, infrequent, given openly and transparently, and properly recorded in our

WHO IS A GOVERNMENT OFFICIAL?

Any officer or employee of a government entity or subdivision, including elected officials;

Any political party official;

Any private person acting on behalf of a government entity;

Any officer or employee of a company that is owned or controlled by the government, such as a state-owned hospital;

Any candidate for political office; and

Any officer or employee of public international organizations, such as the United Nations or World Bank.



books and records. Refer to our Global Policy on Interactions with Healthcare Professionals and Healthcare Organizations for additional guidance related to Healthcare Professionals and the limits around gifts.

Charitable and political contributions. Do not use Saluda funds to make any charitable contributions, charitable donations, or political contributions without prior written approval from the Legal Department.

Use of Third Parties. As a company, we are liable for the acts of the third parties that we engage. You cannot hire a third party to do something that you are prohibited from doing yourself under this policy. Do not engage third parties to do work on behalf of Saluda without a contract. Work with Legal to ensure you have appropriate contracts in place in advance of any services rendered or goods provided by a third party.

Accurate Books and Records. Ensure that Saluda records, specifically our financial accounting records, are true, accurate and complete. Books and records should accurately reflect the transaction. Do not create any off the book records. Follow Saluda policies and procedures around financial reporting controls.

IV. Corrective Action

Employees who violate this or any Saluda policy will be subject to appropriate corrective action, up to and including termination of employment.

V. Questions and Reports

Any questions about this policy or reports about violations of this policy should be sent to your manager, HR, the Compliance Officer, and/or Legal. If you wish to report anonymously, use [Speak Up!](#)

Saluda does not tolerate any form of retaliation or adverse action against anyone who submits a report of misconduct in good faith.

Document Change History

Rev. No.	Effective Date	Owner	Description of Change
1	September 23, 2024	Compliance Officer	Initial Release
2	February 13, 2025	Compliance Officer	1. Added policy statement "Saluda's policy prohibits bribery of any kind"



			<p>2. Removed from facilitation payment section “The payment of an expediting fee to a government entity, and not an individual, in an amount that is transparent and openly published is not typically considered a facilitation payment or bribe”</p>
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