

Diversity, Inclusion and Respectful Workplace Policy

Purpose

As a team, we work together sharing our knowledge and data free from any form of harassment, discrimination, bullying or abusive treatment. We believe that all our employees have a right to work in a workplace that respects and encourages a culture characterized by inclusive practices and behaviors. A respectful workplace ensures that our employees are given an opportunity to reach their full potential and Saluda may in turn reach its full potential as an enterprise.

We strive to achieve a diverse and skilled workforce, leading to continuous improvement in service delivery and the achievement of corporate goals; a workplace culture characterized by inclusive practices and behaviors for the benefit of all staff; employment and career development opportunities for all employees, including participation in senior management and at board level; and awareness of workplace rights and responsibilities for all employees.

Scope

This policy applies to all employees, officers, directors, and contractors of Saluda Medical, Inc and its majority-owned subsidiaries (the “Company” or “Saluda”). It supplements and does not supersede any country, site, or legal entity specific policy addressing harassment, discrimination, or other inappropriate workplace behaviors.

Policy

Saluda embraces diversity and equal opportunity. We are committed to building a team representative of a variety of backgrounds, perspectives, and skills. We believe people are the source of our inspiration and innovation. We believe that diversity contributes to the achievement of its corporate objectives and recognize the benefits arising from diversity at all levels of the business, which include being able to attract people with the best skills and attributes, improving employee retention rates and accessing different perspectives and ideas.

Nondiscrimination and Harassment

Saluda will not discriminate in hiring, promotion, compensation or in any other term or condition of employment, nor will it tolerate any form of harassment on grounds of race, color, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity, legal or preferred name, political views, marital status, pregnancy, family structure, medical condition, political affiliation, disability or veteran status or any other classification protected by law (these are called “protected characteristics” in this policy).

Workplace Harassment Defined

Workplace harassment is unwelcome verbal, visual or physical conduct based on a protected characteristic, which creates an intimidating, offensive or hostile work environment that interferes with work performance. Harassment can take many forms, including but not limited to:

- Verbal conduct such as slurs, jokes, insults, epithets, gestures, or teasing;
- Visual or graphic conduct such as offensive posters, symbols, cartoons, drawings, computer displays, emails, texts, or other communications;
- Physical conduct such as purposeful unwelcome touching, physically threatening another person or blocking someone’s way;
- Stereotyping or attributing specific behavior or descriptions to any protected characteristic; or

- Conduct that has the purpose or effect of unreasonably interfering with a person's work; performance by creating an intimidating, hostile, humiliating or offensive work environment because of a person's protected characteristic

Sexual Harassment Defined

Sexual harassment is a specific form of harassment that is based on a person's gender and that is sexually based behavior. Sexual harassment could include the following examples of unwelcome conduct, including but not limited to:

- Unwelcome or unsolicited sexual advances, flirtations, leering, whistling, touching, pinching, or blocking normal movement;
- Requests for sexual favors or demands for sexual favors in exchange for favorable treatment
- Sexual jokes or comments;
- Sexual propositions or suggestive or insulting comments of a sexual nature;
- Sexually explicit emails, texts, voicemails, instant messages, or other communications;
- Conversations about one's own or someone else's sex life;
- Conduct or comments consistently targeted at only one gender, even if the content is not sexual; or
- A reprisal or threat of reprisal in response to the rejection of a sexual solicitation or advance.

Any sexual harassment referenced above violates this policy even if it is not illegal. Keep in mind that it does not matter if you don't intend to harass someone; it is how the other person perceives your behavior that matters.

Bullying and Abusive Treatment

We believe our employees should feel safe at work. Bullying and abuse have no part in our workplace – it often leads to a breakdown in communication and can have a serious impact on our employees' morale, sense of safety, and productivity.

What is bullying/abuse?

Bullying or abuse can take the form of repeated mistreatment targeting one or more people using verbal abuse, offensive conduct, or interference. It can involve the use of force, threats, or coercion to abuse, intimidate or humiliate another individual. Here are a few examples, although bullying or abusive treatment can take other forms not listed here:

- Threatening, humiliating, or intimidating behavior;
- Work interference/sabotage that prevents work from getting done;
- Verbal abuse;
- Cyberbullying;
- Generally dismissive, rude, or contemptuous treatment of others;
- Singling out a particular colleague or group of colleagues for dismissive, rude, or contemptuous treatment;
- Singling out a co-worker by ignoring or excluding them from group meetings or activities;
- Spreading rude or false rumours about someone;
- Ganging up on a co-worker; or
- Teasing or joking at a co-worker's expense.

Negative Impacts of Harassment, Bullying and Abuse

Harassment, bullying and abuse can have many negative impacts, including but not limited to:

- Creating an intimidating, hostile or offensive working environment;

- Interfering with an employees' work performance; or
- Adversely impacting an employee's morale and sense of safety or well-being.

The conduct described in the examples above is unacceptable in the workplace and any work-related settings such as business trips and business-related social functions.

Workplace Conflict

Workplace conflict may occur when people's ideas, decisions or actions are in opposition, or when two people share different viewpoints of values. Conflict is a normal part of life and, if handled well, can lead to positive outcomes. It is worth noting that:

- Not all types of negative behavior at work will constitute bullying or harassment; the behavior may instead be an example of workplace conflict.
- Should workplace conflict detract from a positive work environment, please speak to your manager or member of the HR team for advice on conflict resolution strategies.

Reasonable Management Action

Reasonable management action taken by managers or supervisors to direct and control the way work is carried out is not considered to be workplace bullying or harassment if the action is taken in a reasonable and lawful way.

Examples of reasonable actions by management may include, but are not limited to:

- Setting reasonable performance goals, standards, and deadlines;
- Rostering and allocating working hours;
- Transferring an employee for operational or other business reasons;
- Deciding not to select an employee for promotion;
- Informing an employee about unsatisfactory work performance in an honest, fair and constructive way;
- Informing an employee about inappropriate behavior in an objective way;
- Implementing organizational changes or restructuring; and
- Taking disciplinary action, including warnings, suspensions or terminating employment.

Complaints Made in Bad Faith

Saluda expects that any reports of bullying, harassment or discrimination are made on a legitimate and genuine basis. In other words, the person making the report genuinely believes that they or another person is being bullied, harassed, or discriminated against and is bringing such a complaint on that basis, and for no other unrelated reasons.

For this reason, any reports of bullying, harassment or discrimination which are purposefully untrue, malicious, or made in bad faith may result in consequences of non-compliance as outlined in this policy.

Practical Guidelines

Here are some practical guidelines to follow to ensure that you are acting respectfully and professionally:

- Remember that your actions reflect on you and Saluda.
- Treat everyone with fairness, equity, and respect.
- Think before you speak. Language, jokes, stories, and written communications in the workplace should always be appropriate – when in doubt, do not engage in the contemplated behavior.
- Be aware of how your words and actions may be perceived regardless of your intent. If someone feels harassed, your intent does not matter.

- If someone offends or upsets you, it is generally best to let that person know so that it won't happen again.
- If you see someone who has been offended or upset by a co-worker or a third party, take action, which could include:
 - Stop, call out, or deflect the offensive behavior;
 - Check in with your offended colleague; or
 - Report the incident to your manager, HR or Legal.
- If you have offended someone, try to understand the other person's perspective. Apologize and don't let it happen again. We all make mistakes, but we expect you to be accountable for your behavior.

Special Responsibility of Managers

Any manager who learns of an employee's conduct in violation of this policy, whether informally or through a formal complaint, has a special responsibility and must immediately report the violation or complaint (as the case may be) to HR or Legal. In addition, managers who observe vendors, customers or other third parties acting in a way that is contrary to this policy towards a Saluda employee are expected to intervene or redirect the activity in a way that makes it clear to the third party and the Saluda employee that this behavior is not condoned by Saluda. Although Saluda cannot control the actions of third parties, as a leader, you have a responsibility to make it clear that you are not endorsing any behaviour that would violate this policy. Saluda expects its managers to lead by example in creating the conditions for a respectful workplace.

Corrective Action

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

Questions and Reports

Any questions about this policy or reports about violations of this policy should be sent to your manager, HR, Legal or complianceoffice@saludamedical.com.

Anyone who knows or suspects a violation of this policy, or any other Saluda policy, or the law must raise the issue immediately through the most appropriate reporting channel, such as your manager, Compliance, Legal, or HR, or by emailing Complianceoffice@saludamedical.com.

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

Review of this Policy

This policy will be reviewed annually by the Board of Directors to ensure it is operating effectively.

Document Change History

Rev. No.	Effective Date	Owner	Description of Change
1	DATE 2022	Kristin Caplice, Chief Legal Officer	Initial Release
2	November 5, 2025	David First, Chief People Officer	Included Diversity and Inclusion language