Global Whistleblower Policy

Purpose

We are committed to acting and conducting business honestly, fairly, with integrity, and in line with the law. We expect all employees to maintain high standards consistent with the Code of Business Conduct.

A culture of openness and accountability is essential for the us to detect wrongdoing and address it quickly if it does occur. Usually, employees are the best sources of information about whether we are living up to our company values. Speaking up about concerns helps us identify wrongdoing that may not otherwise be uncovered. The purpose of this policy is to encourage the reporting of concerns as soon as possible.

Scope

This policy applies to all whistleblowing concerns raised by:

- Any current or former directors, officers, employees, contractors, consultants, agency workers, volunteers, interns, and any other person engaged by Saluda Medical and its majority-owned subsidiaries (the "Company" or "Saluda"); and
- Any current or former suppliers of goods or services (paid or unpaid) to the Company.

This policy supplements and does not supersede any country, site, or legal entity specific policy addressing whistleblowing concerns.

Whistleblowing Defined

Whistleblowing is the disclosure of information where you have reasonable grounds to suspect that it concerns misconduct, serious wrongdoing, or improper circumstances in relation to the Company ("whistleblowing concerns")

A whistleblowing concern does not have to involve a breach of law. It might involve a systemic issue that the Company needs to know about and fix or it might relate to behavior that is prohibited by the Code of Business Conduct.

Examples of whistleblowing concerns could include situations where you have reasonable grounds to suspect that the Company or any employee have engaged in conduct involving:

- Criminal activity
- Failure to comply with any legal or regulatory requirements
- Danger to health and safety or to the environment
- Bribery or corruption
- Tax evasion
- Breach of confidentiality or privacy
- Behavior that harms or is likely to harm the Company's reputation or financial well-being
- Bullying, sexual, or other harassment or any other breach of the Code of Business Conduct
- Breach of the Company's other internal policies and procedures
- Retaliation against a whistleblower
- Deliberate concealment of any of these matters

This policy does not apply to grievances related to current or former employment with the Company that don't relate to any of the above.

Policy

Saluda encourages all employees to report whistleblowing concerns as soon as they are known. You may report anonymously through the Speak Up! third-party provider and be protected under this policy and applicable law. To facilitate the Company's ability to properly investigate, remember to check back with the third-party service regularly to address any questions posed.

If you do not wish to be anonymous, you may report directly to the Compliance Officer or the Chief Legal Officer. We will take reasonable steps to protect your identity unless you consent to disclosure or disclosure is needed as part of the investigation, legal advice, or legal proceedings.

The Company will carry out an initial assessment of the whistleblowing concern according to the Global Investigations Policy and Investigations Guidelines. The Company will contact the whistleblower (including through the third-party Speak Up! Program) to gain more information as needed.

Any investigation and its outcome will be reported to the Compliance Committee and if material, to the Board of Directors.

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 employee who submits a report in good faith.

Document Change History

Rev. No.	Effective Date	Owner	Description of Change
1	November 5, 2025	Trish Kerr, Compliance Officer	Initial Release