

Compliance Documentation Governance

1. Purpose

- 1.1. The purpose of this governance document is to set forth the governing principles for documents that impact the Bioventus Global Compliance Program.

2. Scope

- 2.1. This Policy applies to all Bioventus employees engaged in creating, revising, reviewing, approving, implementing training on, and archiving Bioventus Compliance-related documents including but not limited to Governance documents, program documents, policies, procedures and work instructions.

3. Governance

- 3.1. **Structure:** Bioventus will ensure the requirements of this Policy are implemented consistent with the following definitions:
 - 3.1.1. **Governance Documents** are documents that provide guidance on Bioventus governing standards for conducting Bioventus business or executing activities impacting the Bioventus Compliance Program. Examples of these documents include the Code of Compliance and Ethics and this Compliance Documentation Governance.
 - 3.1.2. **Program Documents** provide more detailed guidance about complex regulated activities. An example of this type of document includes the Bioventus Global Privacy and Data Protection Policy.
 - 3.1.3. **Policies** provide high level principles to guide activity in alignment with Bioventus values and standards. Policy documents outline what is expected of employees and those who work on behalf of Bioventus. The principles of a policy remain consistent even if a process changes.
 - 3.1.4. **Procedures** provide the details for how to perform job tasks including roles and responsibilities and the execution steps of an activity.
 - 3.1.5. **Work instructions** provide the guidelines for performing a specific task.
- 3.2. **Document Management:** Policies are expected to be sequentially numbered and available to all employees on a shared drive or the intranet. All such documents will be housed by the Compliance department.

4. Requirements

- 4.1. **Document templates:** Bioventus Compliance policies and procedures will be documented using the template approved by the Chief Compliance Officer.
- 4.2. **Review and Feedback:** All new and revised documents will be reviewed by relevant subject matter experts and stakeholders prior to approval in accordance with this governance. All feedback will be considered but final content is determined by the designated approvers.
- 4.3. **Approval:** The compliance-related documents listed below require approval of the Chief Compliance Officer (at a minimum):

Compliance Documentation Governance

- 4.3.1. Governance Documents
- 4.3.2. Program Documents
- 4.3.3. Policies
- 4.3.4. Procedures
- 4.3.5. Work Instructions

In addition, all Compliance Policies shall be approved by the internal Compliance Committee.

- 4.4. **Timing:** Policies and procedures should be reviewed and updated every two years, at a minimum, or as needed.
- 4.5. **Training:** All Bioventus employees are required to train on Program Documents and Policies that support the Bioventus Compliance program, in alignment with their Biolearn curriculum. At a minimum, training includes that the employee read and acknowledge the document.
- 4.6. **Document access:** Approved documents supporting the Bioventus Global Compliance Program will be available on Bionet and/or in Biolearn.

5. References

6. Revision History

Effective Date	Revision #	Description of Change
07/01/2023	1	Updated document to reflect current practices.