

Exclusions Screening Policy

1. Purpose

1.1. The purpose of this Policy is to provide guidelines for Bioventus to meet its obligations to ensure that employees, contractors, and third parties working with, or on behalf of, Bioventus are in good standing to participate in U.S. federal healthcare programs or government contracts. Bioventus is committed to maintaining high standards of integrity in its financial and business operations and reserves the right to screen Bioventus employees and those who work on our behalf for exclusion, debarment, or any other factors that may potentially impact an individual's or an entity's eligibility.

2. Scope

2.1. The requirements outlined in this Policy apply to all Bioventus employees.

3. Definitions

3.1. **Excluded/Debarred:** Being listed on the United States General Services Administration List of Parties Excluded from Federal Programs, the United States Department of Health and Human Services Office of Inspector General List of Excluded Individuals/Entities, or any other list Bioventus determines is relevant to our business.

4. Process Description

4.1. Bioventus is committed to comply with requirements to screen employees, contractors, and third parties who conduct business with, or on behalf of, Bioventus to ensure that they are not excluded, debarred, or otherwise ineligible to conduct business with or on behalf of Bioventus.

4.2. **Employees and Contractors:** New employees and contractors at Bioventus shall be screened upon hire. All employees and contractors are required to self-disclose any information that might preclude their involvement in Bioventus business operations at the time of hire and during the term of their employment. This includes restrictions, including restrictions that might prevent their involvement in U.S. federal government programs or U.S. government contracts, and any debarments, sanctions, suspensions, or any other event that makes the individual potentially in violation of this Policy.

4.2.1. If an exclusion check of an applicant for employment indicates the candidate has been excluded from federal healthcare programs, the candidate will not be offered employment.

4.3. **Third parties conducting business with, or on behalf of, Bioventus:** Bioventus exercises care when entering into arrangements with business partners, including distributors, vendors, and others who are operating on our behalf. We are committed to never doing anything through a business partner that we are not permitted to do ourselves. As such, anyone engaging or

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selecting third parties to act on Bioventus' behalf or to provide assistance to Bioventus should:

- 4.3.1. Comply with all requirements set forth in the *Vendor Management Global Policy*.
- 4.3.2. Ensure that exclusions checks are conducted before any written agreement for services is entered into.
- 4.3.3. Remain vigilant and alert to any potential "red flags" or warning signs that the third party may be engaged in corrupt business practices.
- 4.3.4. Ensure that exclusions screenings on third parties are conducted annually or at the time of contract renewal.
- 4.3.5. Report any actual or suspected violation of this Policy to your manager or to Human Resources, Legal, or Compliance via our Ethics and Advice Line available at standup@bioventus.com.

5. References

- 5.1. POL-000076 Vendor Management Global Policy

6. Revision History

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