

Misconduct, Investigation, and Discipline Policy

1. Purpose

- 1.1. The purpose of this Policy is to establish minimum standards for managing and remediating violations of the Bioventus Code of Compliance and Ethics and Bioventus policies and procedures.

2. Scope

- 2.1. This Policy applies to all Bioventus employees. Bioventus may investigate violations of the law, Bioventus' Code of Compliance and Ethics, and all Bioventus policies and procedures.

3. Definitions

- 3.1. **Corrective Action:** An action or actions taken to restore a situation from that of non-compliance to improved and compliant. Corrective actions can include, policy or procedure revision, training or re-training, or improving any part of company operations. Corrective Actions can also include disciplinary actions up to and including termination of employment.
- 3.2. **Disciplinary Action:** An action taken with an employee to eliminate non-compliant behavior. Disciplinary action may include employee training or re-training, verbal coaching, coaching letters, warning letters, and employment termination.
- 3.3. **Ethics and Advice Line:** The mechanism by which employees can report concerns whether anonymously or self-identified with resources available in employee's native languages.
- 3.4. **Investigation:** Technique for responding to allegations of misconduct by an employee at any level, which may involve contacting people with relevant information, reviewing documents and records, and other methods of inquiry to uncover facts and circumstances surrounding a reported concern.
- 3.5. **Misconduct:** Any behavior, statement, or action deviating from or resulting in non-compliance or non-conformance with company policies and procedures, Code of Compliance and Ethics, or applicable laws or regulations.
- 3.6. **Violation:** Any conduct or activity that does not conform to company policies and procedures, applicable laws, or regulations.

4. Process Description

4.1. Expectations

- 4.1.1. Bioventus expects lawful, appropriate, and acceptable standards of work and behavior while conducting company business, either on or off its premises. All Bioventus employees must abide by applicable laws, rules, regulations, the Bioventus Code of Compliance and Ethics, internal policies, and procedures, and industry codes of conduct. Failure to abide

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by standards, policies and laws may result in a charge of misconduct leading to appropriate corrective action.

4.2. Reporting Suspected Conduct

- 4.2.1. All Bioventus employees and those working on our behalf have a duty and are required to report any actual or suspected violation of this policy to your manager, or to Human Resources, Legal or Compliance, or via our Ethics and Advice Line available at standup.bioventus.com.
- 4.2.2. An employee reporting actual or perceived misconduct must act in good faith and have reasonable grounds for the belief that misconduct has occurred. Any employee who makes a report that proves to be made with knowledge that such report is false or is made with malicious intent will be subject to corrective action.
- 4.2.3. All reports received through the Ethics and Advice Line shall initially be screened by Compliance. If a report is deemed a matter of personnel management and not compliance, it shall be referred to Human Resources for follow-up. If a report is deemed a potential matter of compliance misconduct, Human Resources will be notified, and the matter shall be fully investigated by Compliance. When the investigation is complete, Corrective and Disciplinary Action will be taken, as appropriate.

4.3. Investigations

- 4.3.1. Bioventus will investigate any reports of misconduct made in good faith. Subject to subsection 4.2.3 above, all investigations will be conducted by the Compliance department.
- 4.3.2. Bioventus will attempt to gather and consider all relevant information that is reasonably available.
- 4.3.3. If necessary, Bioventus will interview the employee(s) involved in the alleged misconduct (i.e., accused party, witnesses, management, etc.). Interviews should be conducted by members of Legal, Compliance, and/or Human Resources.
- 4.3.4. Bioventus employees are required, upon request, to cooperate fully with all inquiries and investigations regarding alleged misconduct. Withholding information or providing false or misleading information during an investigation will be treated as a serious violation of Bioventus policy.
- 4.3.5. Bioventus shall conduct investigations of alleged violations in a manner that protects the confidentiality or anonymity of the individuals who participate in an investigation. These efforts to maintain confidentiality or anonymity, however, may be subject to local laws and limited by Bioventus' need to conduct a thorough investigation.
- 4.3.6. An employee under investigation may be suspended, with or without pay, pending the outcome of an alleged incident.

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4.4. Disciplinary Action

- 4.4.1. Depending on the nature of the alleged incident and the outcome of the investigation, Compliance, in conjunction with Human Resources, will determine if disciplinary action is warranted.
- 4.4.2. Bioventus will follow a progressive system of disciplinary actions that are appropriate to the nature, circumstances, and severity of the misconduct. Any employee who has been found to have violated Bioventus' policies, procedures, guidelines, or our compliance principles is subject to appropriate disciplinary action up to and including:
 - 4.4.2.1. Initial coaching: For minor offenses, an employee will generally receive an initial coaching by his or her manager. The coaching will set out the nature of the offense and outline the consequences for any further offenses, and the discussion should be memorialized in writing.
 - 4.4.2.2. Coaching letter: For offenses more serious, or for employees who have committed further offenses after receiving coaching by his or her manager, the employee may be given a coaching letter. Coaching letters will typically come from Compliance with a copy provided to the employee's manager.
 - 4.4.2.3. Written warning: For more serious offenses, or if an employee has committed a further offense after receiving a coaching letter, the employee may be given a formal written warning. Written warnings will be recorded in an employee's employment file along with details of specific corrective actions and any follow-up review.
 - 4.4.2.4. Final written warning: For very serious offenses, or for employees who have committed further offenses after receiving a previous warning, the employee may be given a final written warning. The final written warning will set out the nature of the offense and the likely consequences of any further offenses. An employee who fails to take the corrective action specified in the final written warning is likely to face termination.
 - 4.4.2.5. Required training: Bioventus may require an employee to undergo required training to address areas highlighted in the disciplinary process. It is an offense not to participate in required training.
 - 4.4.2.6. Termination: Employees may be terminated for very serious misconduct involving serious breaches of the law or Bioventus policy. Employees may also be terminated for further offenses committed after receipt of a final written warning. Termination in cases of very serious misconduct will generally be without notice or pay.

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5. Revision History

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