

# Bioventus Employee Handbook Canada

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# 1 Introduction

## Dear Bioventus Colleagues,

The vision of Bioventus is to be a global leader in Orthobiologics and a key component of achieving this success is having and developing talented employees. To support our vision and your success, we are continuing to invest in developing tools and processes to facilitate your growth and development as well as the success of Bioventus.

The purpose of the Employee Handbook is to provide a useful source of information, providing guidelines about the rules, regulations and conditions of employment with Bioventus. It is not exhaustive and does not cover every aspect of working life within Bioventus. In order to retain the necessary flexibility in the administration of policies and procedures, the Company reserves the right to add new policies, modify, or revoke any of the policies, procedures, or practices described in this handbook at any time, with or without advance notice.

The intention of the Company is to clearly outline the general terms and conditions of employment for all employees. For certain staff members, the specific terms and conditions of their employment are detailed in their respective Employment Agreements. In those instances where an Employment Agreement is silent on a specific policy issue, the material in this manual will apply. While this Employee Handbook will apply to your employment with Bioventus, your actual terms and conditions of employment are as outlined in your Employment Agreement. Where there is an inconsistency between your Employment Agreement and this Employee Handbook, your Employment Agreement will apply.

The Employee Handbook includes those rules and regulations which are necessary to ensure the efficient conduct of the Bioventus business and help you be more successful.

**NOTE: THE COMPANY INTENDS TO COMPLY WITH THE LAWS OF ANY JURISDICTION IN WHICH IT HAS EMPLOYEES. TO THE EXTENT THAT THE LAW OF ANY APPLICABLE JURISDICTION DIFFERS FROM ANY OF THE POLICIES OR PROCEDURES SET FORTH HEREIN, THE LAWS OF THE APPLICABLE JURISDICTION SHALL APPLY.**

## Vision and Mission

**Our vision** is to be the global leader in Orthobiologics.

**Our mission** is to partner with the health care community to help people resume and enjoy active lives.

## Culture Principles – We operate with Integrity in all that we do as we:

### Impact Patients:

Patient needs are the priority in the choices we make and actions we take

### Develop Ourselves:

Promote continuous learning and development of ourselves to be our best versions. Focus on two tenets to drive success: **Professional** and **Personal** development to maximize our impact on our company and society

**Achieve Goals:**

Communicate and collaborate across functions to understand, align, and own our actions towards achieving business goals

**Value Others:**

Building success by appreciating differences in thought, opinion, background, skill, and perspective. Acting with integrity in all interactions with peers, leaders, and customers. Bioventus will continue Valuing Others and build on that foundation by increasing visibility and incorporating feedback

**Definitions**

**Bioventus** means Bioventus Canada ULC

**Employee** means an employee of Bioventus working in Canada;

**Employee Handbook** means this Employee Handbook;

**Employer** means Bioventus Canada ULC

**Employment Agreement** employee's employment contract with employer stating terms and conditions of employment;

**Personal Data** means data relating to a living individual who can be identified either from that data alone, or from that data and other information, which is held or likely to come into possession of the data controller;

**Bionet** is the Bioventus intranet to be accessed via the [www.bioventusglobal.com/bionet](http://www.bioventusglobal.com/bionet) with the same log on details as for the company computer;

**Homeworking** means employees home as the main place of work.

## 2 Working Hours, Performance and Compensation

### 2.1 Working Hours and Overtime

#### Working Hours

In order to offer excellent service and in view of the international nature of Bioventus, optimal availability is very important. This means that a flexible attitude is required from all Employees in the organisation with regard to start/end times, working additional hours and the timing of lunch breaks.

However upon approval by the immediate supervisor, any Employee may benefit from a personalized flexible time schedule. Through the company, flexible authorization depends on department workload and staffing requirements. This applies only to office staff. However, all Employees are required to be present between 9:30 and 11:30 and between 13:30 and 15:30.

The standard working hours for a full time position amount to 37.5 hours per week. Your lunch break and any other rest breaks are additional to your 37.5 hour working week. Any alternatives to this normal work week must be approved by the Manager.

#### Overtime

Any overtime owing will be paid in accordance with the Employee's employment contract, or in the absence of a contract, in accordance with applicable employment standards legislation. At no time will an Employee receive less than statutory minimums prescribed by law.

### 2.2 Performance Review

Performance standards provide the basis for achieving quality results. Employees and their managers share responsibility for establishing and agreeing to objectives, and working towards them throughout the year. Bioventus measures performance against agreed personal/functional objectives ('What') as well as the way in which Employees behave ('How') aligned to the values set out above. Reviews are held at mid-year and the end of each year.

### 2.3 Compensation

Salaries are reviewed on an annual basis and are influenced by the performance review process, by the external market and other data. This review process does not necessarily mean an adjustment will be made. Any increase to salary is effective on or about 1 April.

Sales Employees are eligible to participate in the Sales Bonus Scheme. Full details are provided in the Plan roles. Office based Employees are eligible to participate in a discretionary bonus scheme, details are communicated under separate cover.

The Sales Bonus Scheme and the discretionary bonus scheme are entirely at the discretion of Bioventus and may be withdrawn, with or without replacement, amended or varied at any time.

Participation in either bonus scheme or receipt of a discretionary bonus payment in one year creates neither the right nor expectation of any bonus in any subsequent year, even if such bonuses are paid consistently over a period of years. Bonus monies, if any, will be determined based on Bioventus' bonus scheme rules.

As a condition of entitlement to and payment of any bonus, Employees must be employed on the date that the bonus is paid, failing which the Employee will not qualify for the bonus payment. If the Employee's employment ceases for any reason prior to the date upon which the bonus is paid, then the Employee is

not eligible for the bonus payment. Neither any period of notice, if any, nor payment in lieu thereof, or combination thereof upon termination of employment shall be considered as extending the period of employment except to the extent otherwise required by provincial employment standards legislation in your province of employment.

Participation in the year of the employment commencing will be pro-rata based on completed months of service.

## **2.4 Company Benefits**

Employees are eligible to participate in the Company benefit plan in accordance with the plan guidelines. Bioventus reserves the right in its absolute discretion to withdraw with or without replacement, amend or vary any of these benefits with or without prior notice, at any time. See for more information the Canadian benefits guide.

Furthermore there is an Employee Stock Purchase Plan. If you would like to know more about this plan you can ask your HR Representative for details.

## **3 Workplace Health and Safety Policy and Program**

### **3.1 Workplace Health and Safety Policy Statement**

Bioventus is committed to the health and safety of the workplace and to complying with all legal obligations, including taking every precaution reasonable in the circumstances to protect Employees. This philosophy is second to none and it is everyone's responsibility to conduct their daily work in a manner so as to ensure the avoidance of accidents. It is expected that all levels of management and staff will understand, promote and cooperate fully with all aspects of the safety program.

We consider our Employees to be our most valuable resources and when their contribution is lost because of a disabling injury, everyone suffers. With the full support and cooperation of everyone, we can maintain safe working conditions for all staff. All staff and management must support, maintain and adhere to all of the safety policies and programs and help ensure that our compliance with the applicable health and safety legislation is transformed into action.

This policy may be reviewed and revised as needed or where deficiencies are identified. Notwithstanding the foregoing, this policy will be reviewed no less frequently than once per year. It is Bioventus policy to have a health and safety procedure available at every front desk in a Bioventus office. Upon visiting a Bioventus office contact your host to provide you with the relevant health and safety documents.

The general office representative for Bioventus in Canada is Gianna Tortorici.

### **3.2 Rights and Responsibilities to Health and Safety**

#### **Bioventus**

It is the responsibility of Bioventus to:

1. provide a safe and healthy workplace;
2. instruct and train Employees in safe work practices;
3. designate a health and safety representative (or a Joint Health and Safety Committee ("JHSC") if applicable) and assist with:
  - a. providing any information required to the health and safety representative (or JHSC);
  - b. responding to recommendations in writing within 21-days of receiving the recommendation or the period prescribed by the applicable occupational health and safety legislation, if later;
  - c. providing copies of all orders and reports issued by Ministry of Labour inspectors; and
  - d. report any workplace deaths, injuries and illnesses.
4. take every precaution reasonable for the health and safety of all Employees in and at the workplace;
5. provide medical and first aid facilities at the workplace;
6. assess the potential for workplace violence and implement appropriate controls to prevent and manage such risk;
7. comply with the occupational health and safety legislation;

8. evaluate all Employees regarding health and safety compliance;
9. enforce health and safety violations by progressive discipline;
10. ensure compliance with this Policy by all outside suppliers, service providers and independent contractors;
11. prepare a written occupational health and safety policy, review that policy at least once a year and set up a program to implement it;
12. post, in the workplace, the names of the health and safety representative (or individuals on the JHSC) as well as meeting minutes;
13. post, in the workplace, a copy of the occupational health and safety policy;
14. post, in the workplace, a copy of the relevant occupational health and safety legislation and any explanatory material prepared by the government, outlining the rights, responsibilities and duties of the Employee; and
15. provide the health and safety representative (or individuals on the JHSC) with the results of any occupational health and safety report that the Company has, and advise Workers of the results of such a report.

#### Supervisors/Managers

It is the responsibility of Supervisors/Managers to:

1. ensure Employees comply with this Policy;
2. ensure Employees use all safety equipment, devices and clothing as directed;
3. advise Employees of all known hazards in the workplace;
4. participate in the investigation of all unsafe work refusals;
5. review reported unsafe and unhealthy hazards or conditions of the workplace;
6. review and comply with all legal duties of supervisors under relevant occupational health and safety legislation;
7. ensure compliance with this Policy by all outside suppliers, service providers, and independent contractors;
8. take every precaution reasonable for the health and safety of Employees at and in the workplace;
9. report all workplace accidents and injuries to the health and safety representative (or individuals on the JHSC);
10. report all workplace violence, harassment and sexual harassment to Human Resource (see the Harassment, Discrimination and Workplace Violence section below for details); and
11. comply with this Policy as an ongoing condition of employment.

## Employees

It is the responsibility of Employees to:

1. co-operate with Managers/Supervisors and Management in the compliance and implementation of this Policy;
2. review and comply with all legal duties of Employees under applicable occupational health and safety legislation;
3. properly use the safety equipment, devices and clothing as provided;
4. refrain from ever making any safety equipment, device or clothing ineffective;
5. refrain from using any dangerous equipment or machinery without proper authorization and training;
6. immediately report any unsafe and unhealthy hazard or condition of the workplace to the Supervisor/Manager, or the most available Management representative, or Human Resources, or, if the matter is not resolved satisfactorily, to the health and safety representative (or individuals on the JHSC). This includes, but is not limited to:
  - fire risks e.g. accumulation of combustible waste, obstruction (or locking) of fire doors, corridors or escape staircases, smoking in no smoking areas;
  - electrical problems, e.g. worn cables, loose connections, multiple connections to power sockets, faulty wiring or trailing cables;
  - defective furniture or equipment, e.g. jagged edges, splintering or unstable/unsuitable positioning;
  - defective flooring, e.g. worn or frayed carpets, or uneven or slippery surfaces;
  - unsuitable loading and stacking;
  - broken glass; and
  - carelessness by an Employee/other person on the premises e.g. trying to repair equipment without proper training;
7. review the Harassment, Discrimination and Workplace Violence Policy and follow the process as outlined in that policy in cases of suspected harassment, sexual harassment, discrimination or workplace violence;
8. exercise the right to refuse to do work that the Worker believes is unsafe in accordance with the procedure set out in applicable Occupational Health and Safety Legislation
9. immediately report any accident or injury, no matter how minor, which occurred in the workplace to the Supervisor/Manager, or the most available Management representative, or Human Resources and
10. comply with this Policy as an ongoing condition of employment.

Employees will receive information, training and competent supervision in their specific work tasks to protect their health and safety. No reprisals or retaliations will be taken against Employees where such concerns are raised.

A failure to follow health and safety rules may result in discipline up to including termination of employment. The severity of any disciplinary measure will be proportionate to the severity of the health and safety violation committed by the Employee.

### **JHSC**

If a JHSC is established in accordance with Occupational Health and Safety legislation, the JHSC is responsible for:

- understanding and complying with the requirements of the applicable health and safety legislation and this policy at all times;
- participating in appropriate training as required by the applicable health and safety legislation and its regulations;
- diligently carrying out all duties/responsibilities assigned to the JHSC;
- understand and promote effective health and safety practices in the workplace;
- represent the health and safety interests of all workers by making recommendations to Bioventus and its Managers/Supervisors; and
- perform ongoing health and safety legislation compliance and workplace health and safety inspections.

### **3.3 No Reprisal**

Workplace health and safety is a serious matter. This policy prohibits reprisals against workers who have made good faith complaints or reports under this policy. Workers who engage in reprisals or threats of reprisals may be disciplined up to and including termination of employment.

Notwithstanding the forgoing, any worker who makes a false complaint or report, or who otherwise abuses this policy, may be disciplined up to and including termination of employment. Such discipline is not a reprisal or breach of this policy.

### **3.4 Hazard and Safety Risks Home Based**

For Employees who are not based in a Bioventus office, it is important that the necessary and appropriate steps are taken if a need arises for immediate care in response to sudden illness or injury whilst at work or performing work activities. Employees must alert HR and their line manager if a situation like this arises.

It is the Employee's responsibility to ensure that all work related accidents, no matter how minor, must be reported to HR.

### **3.5 No Smoking Policy**

In an effort to provide a comfortable working environment for all Employees and in line with anti-smoking laws, there is a no smoking policy throughout the Bioventus office and the office complex where Bioventus is located. Employees may smoke outside the buildings in designated areas, which are

determined by the managing agents of the Bioventus office. Smoking breaks form part of the Employee's unpaid daily break.

### **3.6 Drug Free Policy**

All Employees must report to work in a physical and mental condition which will enable them to perform their duties in a safe and efficient manner completely free of the negative effects of drug/alcohol use.

The Company explicitly prohibits:

- The manufacture, possession, use, sale, distribution, dispensation, receipt, or transportation of any controlled substance or illegal drug, cannabis (excluding prescription cannabis) or alcohol;
- The possession and/or consumption of alcoholic beverages, except at Company-sponsored events, where such consumption is authorized in advance. Excessive consumption rendering one under the influence of alcohol is expressly prohibited under any circumstances;
- Being impaired from the use of alcohol, controlled and/or illegal drugs, cannabis or other substances in any manner while on duty, whether or not consumed on Company premises, and whether or not consumed outside of or during working hours; this includes being impaired by lawfully prescribed drugs that have been misused; and
- Performing duties while impaired by the use of alcohol, controlled and/or illegal drugs, cannabis or other substances regardless of whether the Employee is on or off the premises of the Company.

For the purposes of this policy, the term "Company premises" shall include all land, buildings, structures, parking lots, and means of transportation owned by or leased to the Company.

In addition to the above, the Company reserves the right to consider any other actions or Employee conduct involving alcohol, cannabis, controlled and/or illegal drugs, or lawfully prescribed drugs or substances that, in the opinion of management, endanger the Company's reputation for honesty, integrity, and safety and take any performance management or disciplinary steps it deems appropriate, including termination of employment.

If an Employee is required to take prescription or over-the-counter medications which could impair his or her ability to safely perform his or her job (i.e. coordination, judgment, fitness for duty, safety, or job performance), the Employee is required to report this situation to his/her manager immediately. The approved use of prescription or over-the-counter medications in the workplace will not result in disciplinary action, but may require modified duties or reassignment for safety reasons.

### **3.7 Dress Code**

Bioventus requires all Employees to present themselves in a professional manner, with regard to personal hygiene, attire and appearance. Employees are expected to dress appropriately for their role and are expected to be aware that during working hours they are a representative of the Company and therefore are expected to look professional at all times. It is the responsibility of line managers and Employees to insure that appropriate standards are maintained, examples of inappropriate business dress includes but is not limited to ripped jeans, flip flops, and trainers.

Exceptions may also be permitted on an individual basis when specific requirements are identified to accommodate the needs of an Employee under the relevant provincial human rights legislation.

## **4 Employee Relations and Standards of Conduct**

### **4.1 Equal Opportunities Policy**

Bioventus is committed to promoting equality of opportunity for all Employees and job applicants. Bioventus aims to create a working environment in which all Employees are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit.

Bioventus does not discriminate against Employees on the basis of any protected characteristic in human rights legislation in the province in which the Employee works (the “Protected Characteristics”).

The principles of non-discrimination and equality of opportunity also apply to the way in which Employees treat visitors, clients, customers, suppliers and former Employees.

All Employees have a duty to act in accordance with the Equal Opportunities Policy and treat colleagues with dignity at all times, and not to discriminate against or harass other members of staff, regardless of their status.

### **4.2 Scope and Purpose of the Equal Opportunities Policy**

The Equal Opportunities Policy applies to all aspects of the relationship between Bioventus and the Employees and also relations between all levels of Employees. This includes job advertisements, recruitment and selection, training and development, opportunities for promotion, conditions of service, pay and benefits, conduct at work, disciplinary procedures, and termination of employment.

Bioventus will work to achieve a workplace free from barriers by providing accommodation for the needs of those individuals covered by human rights legislation, up to the point of undue hardship, consistent with the human rights legislation applicable in the province the Employee works. Individuals requesting accommodation must make any needs for accommodation known to management and work with Bioventus in addressing the issue(s).

Harassment related to any of the Protected Characteristics is prohibited. Harassment is dealt with further in chapter 5 Anti-harassment and Bullying Policy.

### **4.3 Breaches of the Equal Opportunities Policy**

If an Employee believes that they may have been discriminated against, that Employee is encouraged to raise the matter with Human Resources. If the Employee believes that they may have been subject to harassment, the Employee is encouraged to raise the matter through the Anti-harassment and Bullying Policy under chapter 5.

Allegations regarding potential breaches of the Equal Opportunities Policy will be treated in confidence, to the extent possible, and investigated in accordance with the relevant procedure. Employees who make such allegations in good faith will not be subject to any reprisal or treated less favourably as a result. False allegations which are found to have been made in bad faith will, however, be dealt with under chapter 12 Disciplinary Procedure.

Any Employee who is found to have committed an act of discrimination or harassment may be subject to disciplinary action, up to and including termination of employment.

# 5 Policy Against Workplace Violence, Harassment and Discrimination

## 5.1 Workplace Violence, Harassment and Discrimination Policy Statement

Bioventus has zero tolerance for workplace violence, harassment and discrimination. It is committed to:

- promoting a healthy and safe workplace where all Employees can be as productive as possible;
- providing a work environment that is safe, respectful and free from workplace violence, harassment and discrimination; and
- preventing, identifying and correcting conduct that would result or has resulted in workplace violence, harassment or discrimination.

This Policy applies to all Employees, workers, subcontractors, supervisors and persons who may come into any workplace, including visitors. In this policy, workplace includes all places where Bioventus business occurs. This includes all Bioventus buildings and job sites and surrounding perimeter including parking lots, sidewalks, and driveways, Bioventus vehicles, company-sponsored functions and recreational or social events, whether taking place on company property or elsewhere and travel for Bioventus business. Employment related incidents that occur beyond the normal workplace, on social media or outside of working hours may also be captured by this policy.

## 5.2 Workplace Violence

“Workplace violence” is defined in this policy as follows:

- the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; or
- a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against a worker, in the workplace, that could cause physical injury to the worker.

Violent behaviour in the workplace is unacceptable from anyone and is an occupational health and safety concern that Bioventus is committed to preventing and remedying. Bioventus will take all reasonable steps to protect its workers from workplace violence from all sources. All Employees are required to uphold this policy and to work together to prevent workplace violence.

Bioventus is required to take all reasonable precautions to protect any worker if a domestic violence situation is likely to expose a worker or workers to physical injury in the workplace, and the employer is aware or ought reasonably to be aware of the situation. Reasonable precautions will be determined on a case by case basis and may include the development of an individual safety plan for the affected worker. Domestic violence is considered violence between two persons who currently have, or have in the past, a personal intimate relationship, such as a spouse, domestic partner.

## Assessment of Workplace Violence

Bioventus will assess the risks of workplace violence, which will include the consideration of circumstances that would be common to similar workplaces and circumstances specific to the workplace, and any other prescribed element required by law. The results of the assessment will be shared with workers. Bioventus will reassess the risks of workplace violence as often as is necessary and at least annually.

Bioventus will implement measures to control the risks identified in the risk assessment.

## 5.3 Workplace Harassment

“Workplace Harassment” is defined in this policy as follows:

engaging in a course of vexatious comments or conduct against a worker in a workplace that is known, or ought reasonably to be known, to be unwelcome or hostile

Workplace harassment may or may not be based on a prohibited ground set out in applicable human rights legislation. Harassment typically involves a pattern of comment or conduct that occurs over time. However, a single incident of a serious nature may be sufficient to constitute harassment.

“Workplace sexual harassment” is defined in this policy as follows:

- engaging in a course of vexatious comments or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or hostile, or
- making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.
- Sexual solicitation is an invitation or advance to participate in some form of sexual activity by a person in a position who has power to confer, grant or deny a benefit or advancement to the person being solicited, where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome.

Examples of harassment include but are not limited to:

- unwelcome remarks, jokes, name-calling or insults whether made verbally or in writing that are demeaning, degrading, embarrassing, or humiliating;
- the displaying of racist, sexist or otherwise offensive pictures, gestures or material;
- advances that are unwelcome or ought reasonably to be known to be unwelcome, including unwanted touching, flirtation, propositions, requests for sexual favour or other verbal or physical conduct of a sexual nature;
- a refusal to converse or work with an Employee because of the person’s racial or ethnic background, gender, sexual orientation or other personal characteristics;
- behaviour designed to intimidate, insult or berate;
- offensive or intimidating comments or jokes;
- bullying or aggressive behaviour;

- displaying or circulating offensive pictures or materials;
- inappropriate staring;
- workplace sexual harassment;
- isolating or making fun of a worker because of gender identity; or
- using the submission to or refusal to accept harassment as a basis for any employment decision including, but not limited to, matters of promotion, career progression, the type of work given, salary/wage increases, job security and benefits.

Differences of opinion, minor disagreements between co-workers or a reasonable action taken by an employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

## 5.4 Discrimination

Bioventus provides a workplace that respects and welcomes diversity, and strives to eliminate barriers that may restrict or exclude persons on the basis of their membership or identification with any protected grounds as defined under applicable human rights legislation. These namely include, but are not limited to:

- race;
- ancestry;
- place of origin;
- colour;
- ethnic origin;
- citizenship;
- creed;
- sex;
- pregnancy;
- sexual orientation;
- gender identity;
- gender expression;
- age;
- record of offences (conviction for a federal offence for which a pardon has been granted and not revoked; or a conviction for a provincial offence);
- marital status;
- family status;

- religion; and
- disability (physical and mental, work related and non-work related).

All Employees and everyone in the workplace share responsibility for creating and maintaining a work environment free from discrimination. Any action or failure to act that results in discrimination on any of the grounds enumerated under applicable human rights legislation will not be tolerated and may result in discipline, up to and including termination of employment.

## 5.5 Roles of the Workplace Parties

Everyone in the workplace must be dedicated to preventing workplace violence, harassment and discrimination. All Employees, subcontractors, supervisors and workers are expected to uphold this policy, and will be held accountable by Bioventus.

## 5.6 Incidents, Complain and Investigations

### Informal Steps

If an Employee feels that he or she is able to do so, they should initially consider communicating with the person behaving inappropriately. The Employee should explain clearly to them that their behavior is not welcome or makes the Employee uncomfortable.

If informal steps have not been successful or are not possible or appropriate, the Employee should follow the formal procedure set out below.

### Raising a Formal Complaint

Bioventus is committed to an ethical work environment and maintaining the highest standards of integrity in our dealings with our customers, Employees, suppliers, distributors, and our communities. Our Code of Conduct contains general guidelines for conducting business with the highest standards of ethics.

Formal complaints must be submitted in writing to HR, whose role is to investigate and achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns that person, the Employee should refer it to their line manager.

The written complaint must include the following information:

1. Name(s) of the complainant(s) and contact information;
2. Name of the alleged wrongdoer(s), position and contact information (if known);
3. Names of the witness(es) (if any) or other person(s) with relevant information to provide about the incident (if any) and contact information (if known)
4. Details of what happened including date(s), frequency and location(s) of the alleged incident(s)
5. Any supporting documents the worker who complains of may have in his/her possession that are relevant to the complaint

Bioventus has a duty to protect all Employees and will investigate all matters of of workplace violence, discrimination and/or harassment or alleged violence, discrimination and/or harassment presented to them, as appropriate in the circumstances.

### Formal Investigations

Bioventus will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone impartial with appropriate experience . The investigation will be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned.

A meeting will be arranged with the Employee within a reasonable period of receiving a complaint so that the Employee can give their account of events. The investigator will arrange further meetings with the Employee as appropriate throughout the investigation.

Where the complaint is about an Employee, Bioventus may consider suspending them on full pay or making other temporary changes to working arrangements pending the outcome of the investigation, if circumstances require. The investigator will also meet with the respondent(s) to hear their account of events. Respondents have a right to be informed of the allegations against them, so that they can respond.

Where a complaint is about someone other than an Employee, such as a contractor, customer, service user or supplier, Bioventus will consider what action may be appropriate to protect the Employee and anyone involved pending the outcome of the investigation, bearing in mind the reasonable needs of the business and the rights of that person. Where appropriate, Bioventus will attempt to discuss the matter with the third party.

It may be necessary to interview witnesses to any of the incidents mentioned in a complaint. If so, the importance of confidentiality will be emphasized to them.

At the end of the investigation, the investigator will submit a report to a senior manager nominated to consider the complaint. The senior manager will arrange a meeting with the relevant Employee within a reasonable period following receipt of the report in order to discuss the outcome and what action, if any, should be taken.

### Violations of this Policy

Bioventus will not tolerate incidents of violence and harassment perpetrated against or by any Employee, visitor or any other person at the workplace or involved in Bioventus business.

Disciplinary action for violations of this policy with respect to acts of workplace violence, discrimination and/or harassment will take into consideration the nature and impact of the violation, and may include legal action, if law enforcement is required at the onset of the violation, a verbal or written reprimand, suspension (with or without pay), or termination of employment for cause/serious reason.

## 5.7 Confidentiality

Bioventus recognizes that individuals may find it difficult to come forward with a complaint under this Policy because of concerns of confidentiality. Therefore, all complaints concerning workplace violence, discrimination, and/or harassment as well as the names of parties involved, shall be treated as confidential, subject to the requirements of a fair investigation and resolution process and except as required by law.

## **5.8 No Reprisals**

This Policy prohibits reprisals against individuals, acting in good faith, who report or provide information about incidents of discrimination, workplace violence or harassment. Bioventus will take reasonable and practical measures to prevent and respond to reprisals.

## **5.9 Other Recourse**

The provisions of this policy in no way affect the right of any person to exercise his or her rights under the applicable occupational health and safety, employment standards or human rights legislation, within the time limits specified by the applicable legislation.

## **5.10 Training**

All Employees will be provided with information and instruction on the application of this Policy.

## **5.11 Annual Review**

This Policy will be reviewed at least annually.

# **6 Non-Disclosure**

## **6.1 Confidentiality**

At all times whether during the course of or following the termination of their employment with Bioventus, Employees are required to treat confidentially and shall not use or disclose any written and oral information concerning Bioventus, affiliated companies, the business, clients and business relations, including but not limited to; trade processes, operational procedures and technology, marketing strategy, financing, accounting policies and business contacts regardless of whether such information includes any references to its being of a confidential nature or to its ownership and regardless of how the Employee became aware of the information, and Employees shall not use this information for any purpose other than in connection with the proper performance of their duties in relation to their employment with Bioventus.

Employees are required to take reasonable precautions to safeguard the confidentiality of documents, correspondence or their copies that he/she has in their possession in connection with the work for Bioventus and/or affiliated companies and/or for clients and business connections outside the offices.

## 7 Illness

### 7.1 Procedure

In the event of absence due to illness, it is important that you call, email or SMS your line manager by the time of the start of your workday (in general 9:00 AM) of your first day of illness to advise that you will not be attending work. The manager will let HR know that the Employee is sick. In case the manager is not reachable, the Employee reports the sickness to HR.. If the Employee's manager and HR are both unavailable initially, the Employee must continue to attempt to contact both HR and the Employee's manager so that the absence is reported before 10:00 AM.

Employees must continue to notify their Manager or Team Lead on each subsequent day of absence, unless the Employee has provided the Manager or HR with an expected date of return and the manager or HR has indicated the Employee is not required to notify of each subsequent day of absence. When reporting sick, the Employee should at least inform the employer about the following:

- Estimated date of return to work
- Telephone number and (nursing) address
- The tasks with high priority that have to be finished while the Employee is on sick leave.
- Whether the sickness is work related
- Whether it is related to an occupational injury

The notification to the Manger or HR must be made by the absent Employee personally unless there are extenuating circumstances.

Line managers are required to inform HR of any illness immediately and on-going.

The Employee is required to make an office note on their email with a forwarding point of contact.

Line managers will discuss the illness with the Employee, seek to understand the expected date of recovery, and ascertain the consequences of the illness to the Employee's work.

Bioventus reserves the right to require medical certification of illness or injury after 3 days of illness, and information relevant to the Employee's ability to attend and perform work either from the Employee's physician and/or from a medical examination by a Health Care Professional identified by Bioventus in cases where frequency of taking sick time increases beyond minimum entitlement or, whenever Bioventus considers such action necessary. Bioventus may require medical notes to be updated regularly throughout the period of absence.

If an Employee is unable to work due to illness the Employee may be entitled to sick pay from Bioventus. All payment of sick pay is discretionary.

Sick pay entitlements are as follows and are accumulated on an annual basis, based on the calendar year. Any sick pay entitlement accrued but unused cannot be transferred over to the following calendar year:

<b>Period of employment</b>	<b>First 2 months</b>	<b>3rd &amp; 4th month</b>	<b>5th &amp; 6th month</b>
6 months but less than 2 years	100% of salary	75% of salary	50% of salary
2 – 5 years	100% of salary	100% of salary	75% of salary
5 years and more	100% of salary	100% of salary	100% of salary

The Employee must have worked at least 6 consecutive months to qualify for paid sick leave. The first 4 months of sickness Bioventus will continue to pay for the car allowance.

If the absence is prolonged beyond 6 months, the employee will be eligible to apply for benefits under the Company's group insurance plan. Any issue with respect to eligibility, entitlement, level of benefits or other related questions are as between the employee and the insurance carriers, subject to the provisions of the specific insurance contract.

No paid sick leave days are retained at the end of any calendar year and no payment of unused days will be made upon termination of employment.

## **7.2 Accrued Vacation during Illness**

If an Employee is absent from work due to illness but wishes to use some of their holiday entitlement, they should ask permission from their line manager and HR. If permission is granted, these days will be counted as holidays.

Vacation entitlement continues to accrue during the period of paid sick leave.

## 8 Vacations, Holiday and Leave

### 8.1 Vacation

Upon commencing employment with Bioventus, Employees are entitled to 15 days' paid vacation per year, excluding banked vacation days. Vacation entitlement for Employees joining part way through a year will be pro-rata from the date of joining.

The vacation year runs from 1 January until 31 December. Vacation is accrued on a monthly basis. In the respective vacation years in which an Employee's employment commences or terminates, entitlement to vacation shall accrue on a pro-rata basis for each complete month of service during the relevant vacation year. If the Employee does not work on a full-time basis, vacation rights shall be awarded pro-rata to the amount of days worked.

Vacation eligibility credits shall be accrued in accordance with the schedule noted below:

<b>Years of service outlined during current calendar year</b>	<b>Vacation Entitlement</b>
0 – 4 years	15 days
5 – 15 years	20 days
16 or more years	25 days

The start and end dates of vacation will be decided in joint consultation with, and after formal approval of, the Employee's line manager. Both line managers and Employees will ensure that vacations in accordance with applicable employment standards are taken in the year in which they are accrued.

Employees shall be entitled to statutory holidays as described in the relevant employment standards legislation in the province in which the Employee works.

In order to qualify for statutory holiday pay, an Employee must meet the qualifications and requirements set out in the applicable employment standards legislation.

Compensation for statutory holidays will also be as described in the relevant provincial employment standards legislation, as amended from time to time.

### 8.2 Personal Days

Each Employee may take up to 3 days of paid time off anytime throughout the calendar year with management approval. Personal days are inclusive of and not in addition to an Employee's entitlement to statutory sick leave, family leave or other paid leaves under the applicable labour standards legislation. Personal days do not carry over to subsequent calendar years. Any unused personal days are forfeited at the end of the calendar year and are not paid out.

### 8.3 Vacation Duration

Employees are able to take vacation at any time during the year, subject to the prior approval of their line manager. In some positions, it may be appropriate to avoid taking vacation at busy times such as quarter end. The duration of vacation is decided in joint consultation with the Employee's line manager.

The maximum number of vacation days that can be taken at any one time is ten working days (i.e. two weeks). This duration can be extended with the prior approval of the Employee's line manager after full consideration of workload and timing. Quebec employees are entitled to take up to fifteen vacations days at one time.

## 8.4 Illness during Vacation

If an Employee becomes ill during a period of vacation, the Employee should notify their line manager and should obtain an illness certificate from their doctor, as prescribed by applicable employment standards legislation, and forward this to HR as soon as possible. Once this has been received, the line manager will re-allocate this time as sick leave and adjust the Employee's holiday balance accordingly.

## 8.5 Statutory Leave of Absence

An Employee may be eligible for statutory leaves of absence in certain circumstances. Eligibility and conditions for the leaves of absence will be governed by the applicable provincial employment standards legislation. For more information about the statutory leaves (detailed below or otherwise) pursuant to applicable provincial employment standards legislation, please see the overview on Bionet.

Unless otherwise noted, or provided by the applicable provincial employment standards legislation, statutory leaves of absence are unpaid.

Statutory leave of absence entitlements pursuant to applicable employment standards legislations are published on Bionet. Further entitlements to Bereavement Leave and Maternity and Parental Leaves are outlined in sections 8.9 and 9 below.

### Eligibility

All Employees seeking a statutory leave must inform their line manager in writing as soon as possible that they will be taking the leave. Leave provisions, eligibility and entitlement vary from province to province. Please refer to the specific provincial legislation and contact Human Resources.

### Benefits During Statutory Leave

Employees on Leave without Pay are not eligible to accrue paid time off including vacation pay, unless prescribed by employment standards legislation in the province the Employee works.

Employees on Leave without Pay for more than four (4) weeks prior to the statutory Holiday are not eligible for paid statutory Holidays falling within the leave period.

During the Employee's absence, he/she is entitled to continued participation in Bioventus' group benefits plans. Bioventus will fund the Employee's health insurance premiums while the Employee is out on leave. However, the Employee is required to pay any benefit premiums normally deducted from payroll to the Company on a monthly basis. Post-dated cheques for any premiums otherwise paid by the Employee for such benefits are required prior to the start of the leave and must be dated in accordance with the payment schedule in order to continue eligibility under the plan.

### Employee Obligations While On Statutory Leave

During a period of statutory Leave, an Employee is required to keep his or her manager and the appropriate Human Resources Business Partner informed of current circumstances which might prevent him or her from returning to work as scheduled.

If an Employee is able to return to work before the scheduled end of the Leave period, he or she must notify their manager and appropriate Human Resources contact in accordance with the statutory requirements.

## 8.6 Employment Insurance

Employees may request Leave without Pay. Upon approval of such a leave, Bioventus will issue a Record of Employment to the Employee to enable the Employee to apply for Employment Insurance benefits. Service Canada is responsible for administering Employment Insurance benefits in all provinces (with the exception of the Québec Parental Insurance Plan under which maternity, paternity, parental, and adoption benefits are paid in Québec). As a result, the following policy may change from time to time due to changes in criteria implemented by Service Canada (or Revenue Quebec).

For a full overview of the leaves, please refer to the leave policy on Bionet.

Employment Insurance Benefits are available to eligible Employees, such as:

- Maternity and parental benefits
- Sickness Benefits - people whose illness prevents them from working
- Compassionate care benefits
- Benefits for parents of Critically Ill Children
- Federal Income Support for Parents of Murdered or Missing Children

To be eligible for the above Employment Insurance benefits an Employee must meet the requirements.

- Must apply for benefits
- Must have worked the required number of hours

## 8.7 Other Company Leaves Without Pay

### Personal Leave Without Pay

Employees may request, and be granted under certain instances, a Personal Leave without Pay for compelling personal reasons. Employees should work with their Human Resources Business Partner to determine the options that may be available.

Personal Leave without Pay is not a protected status, therefore, a return to work request will be reviewed with HR and managers on a case by case basis.

Employees not eligible for a statutory leave or who have exhausted their statutory leave may be granted an unpaid leave, under certain circumstances, if they are unable to work as a result of illness or injury.

### Benefit Status While On Personal Leave Without Pay

Employees on Leave without Pay are not eligible to accrue paid time off including vacation pay.

Employees on Leave without Pay for more than four (4) weeks prior to the statutory Holiday are not eligible for paid Holidays falling within the leave period.

### Employee Obligations While On Personal Leave Without Pay

During a period of Personal Leave without Pay, an Employee is required to keep his or her manager and the appropriate Human Resources Business Partner informed of current circumstances which might prevent him or her from returning to work as scheduled.

If an Employee is able to return to work before the scheduled end of the Leave without Pay period, he or she must notify their manager and appropriate Human Resources Business Partner immediately.

#### **Return To Work From Personal Leave Without Pay**

If an Employee returns to work within thirty (30) calendar days of the effective date of leave, it is the practice of the Company to reinstate the Employee to his or her previous position if it is available.

Unless otherwise required by law, the Company cannot guarantee that an Employee will be reinstated to the previous position when an Employee is on a Personal Leave without Pay for more than thirty (30) calendar days. Continued employment in such circumstances is subject to the availability of a position for which the Employee is qualified when the Leave without Pay is scheduled to end. If an Employee fails to return to work on the scheduled date, he or she will be considered to have voluntarily resigned effective the scheduled return date.

### **8.8 Bereavement Leave**

The loss of a family member can be very distressing and Bioventus appreciates that Employees may wish to spend time with their family at such time. The policy on paid bereavement leave is as follows:

- a) for immediate family, i.e. parents, spouse or partner, children (including step children, adoptive or foster children), brothers and sisters – 5 paid days
- b) for extended family, in-laws (father, mother, brother, sister, son, daughter), grandchild, “step” or “half” family members – 3 paid days
- c) for grandparents of Employee or spouse - 1 paid day.

An additional day will be paid if the funeral service is more than 250 kilometers from the residence of the Employee.

A death certificate may be requested by Human Resources.

All such leave is subject to the prior approval of the Employee’s line manager. If an Employee requires additional unpaid leave, they should speak to their line manager.

This Bereavement Leave entitlement is inclusive and exhaustive of minimum Bereavement Leave entitlements pursuant to applicable employment standards legislation.

## 9 Pregnancy and Parental Leave Top Up

### Pregnancy Leave

During the entire pregnancy leave you will be entitled to your benefits.

Usually, the earliest a pregnancy leave can begin is 16 weeks before the Employee's due date. However, when an Employee has a live birth more than 16 weeks before the due date, she will be able to begin her pregnancy leave on the date of the birth.

Ordinarily, the latest a pregnancy leave can begin is on the baby's due date. However, if the baby is born earlier than the due date, the latest the leave can begin is the day the baby is born.

Within these restrictions, an Employee can start her pregnancy leave any time within the 16 weeks up to and including her due date. Bioventus cannot decide when the Employee will begin her leave even if the Employee is off sick or if her pregnancy limits the type of work she can do. An Employee may decide to take a shorter leave if she wishes.

However, once an Employee has started her pregnancy leave, she must take it all at once. She cannot use up part of the 18 weeks, return to work and then go back on pregnancy leave for the unused portion. If she returns to work for the employer from whom she took the leave, even if it is only part-time, then she gives up the right to take the rest of her leave.

The employee is entitled to her car allowance the first 4 months of her leave.

### Parental Leave

Parental leave in Canada is unpaid. However depending on where you live you might be eligible for Employment Insurance benefits, therefore you can inform yourself with the Government of Canada or provincial governments.

In general, parental leave must be taken immediately after pregnancy leave or after an adopted child comes in custody of the Employee.

Benefits continue unless Employee notifies employer that it does not intend to pay Employees contribution.

The regulations are different per province but generally Bioventus would like to be informed in writing at least 6 weeks before the start of any parental leave.

## 10 Flexible Working

Bioventus is committed to providing flexible working arrangements, where required under applicable employment standards and/or human rights legislation. Requests for flexible working arrangements should be made to immediate manager and HR department.

## 11 Termination of Employment

All terms related to the termination of an Employee's employment, whether it be done by the Employee or by Bioventus, are governed by the terms of the Employee's employment agreement.

## 12 Privacy Policy

### 12.1 Privacy Policy Statement

Bioventus undertakes to respect the privacy of the individual and has implemented strict procedures to protect the rights of the individual under any applicable privacy legislation. Bioventus processes personal data (both manually and electronically), including sensitive personal data, for a number of employment purposes, including but not limited to:

- recruitment, appraisals, promotions, career planning, training and the provision of references;
- payment of salary and benefits, payroll, taxation, national insurance (and other statutory or contractual deductions from salary), reimbursement of expenses and business travel;
- health and safety matters;
- review and management of Company policies and procedures;
- disciplinary and performance management; and
- other purposes required by law, regulation or as deemed necessary by Bioventus for the management of Employees and the business.

Employees consent to Bioventus and their appointed agents, where reasonably necessary, holding and processing both electronically and manually, the data that it collects in relation to Employees and their employment.

This includes other personal data that is required for the purposes of employment, i.e. for the purposes of management and administration of Employees and business and/or for compliance with applicable procedures, laws and regulations and to the storage transfer and processing by Bioventus or its agents of such data. The records that the Company holds include but are not limited to:

- personal details held on Employee files, e.g., home address, contact details etc.;
- illness absence;
- sick pay;
- suitability and fitness for work;
- health and safety control;
- maternity, paternity, adoption leave and pay, parental leave and/or time off for family and dependents;
- absence control;
- any other personal information provided by the Employee; and
- those required by applicable laws and regulations.

## 12.2 Collection of Data

Bioventus collects and records personal data from various sources, including obtaining information from data subjects themselves.

In some circumstances, data may be collected indirectly from monitoring devices (including but not limited to: door access-control mechanisms, closed-circuit television and other security systems, telephone, e-mail and internet-access logs and recordings).

With the exception of data collected from the security systems, data collected indirectly from monitoring devices is not routinely accessed but access is possible and may occur for the purposes set out in this Privacy Policy. Data collected from monitoring devices is accessed and reviewed regularly. Such data may be processed in circumstances including, but not limited to, the investigation of security breaches, abuse of Bioventus Information Technology systems, or where the data is required for regulatory purposes.

## 12.3 Transferring Data

From time to time, the Company will transfer personal data out of Canada and in particular into the United States of America and to the Netherlands.

Personal data may also be transferred to third parties to process on Bioventus' instructions, subject to confidentiality and security arrangements approved by Bioventus.

## 12.4 Retaining Data

The Company endeavours to ensure that the personal data held is accurate and that inaccurate, irrelevant and excessive information is either deleted or rendered anonymous when reasonably practical. However, the Company may retain some personal data in order to comply with legal and regulatory obligations and for other legitimate business and employment reasons.

Bioventus reserves the right, at its absolute discretion, to retain personal data after the termination of employment, for purposes including, but not limited to, equal-opportunities monitoring, maintaining health and safety records and in relation to possible or actual legal claims, and where required or permitted by law.

## 12.5 Personal Data Changes

Should an Employee have any changes in their personal circumstances which could cause the Personal Data held by Bioventus to be incorrect, e.g. change of address, telephone number or emergency contact details, they are responsible for notifying HR via Workday.

Workday is the global Bioventus HR information system, all Employees can access Workday via Bionet and update any personal information. HR and payroll will follow up accordingly.

## 12.6 Access to Personal Data

Should an Employee wish to view any of their personal data, they should provide a formal written request to HR.

## 12.7 Requests to Verify Employment Information

Requests for information from third parties, such as mortgage providers, will be denied unless required or permitted by law. Where an Employee provides explicit consent by e-mail to the disclosure, HR will supply such information.

## 12.8 Secure Record Retention

If an Employee is in possession of personal data (including, but not limited to, data held in spread sheets, contained in CVs, contact lists or address books), they are obliged to ensure that such personal data is kept in a safe place and is not accessed by unauthorised persons. Employees are required to use physical, technical, and administrative safeguards to ensure that personal data is not accessed by unauthorized persons. Physical safeguards include the diligent use of secure filing cabinets and not leaving records containing personal data unattended. Technical safeguards include the use of secure passwords for systems containing personal data and using secure methods to transfer electronic records containing personal data. Administrative safeguards include the Employee's duty to only share personal data with Employees who need such access in the course of their employment duties.

## 12.9 Incident Response

If an Employee suspects that personal data may have been accessed without authorization they must immediately report their suspicion to their supervisor or to directly to Bioventus Compliance department. Supervisors who are notified of such a suspicion must notify the Compliance department. Unauthorized access to personal data includes misdirected communications to unintended recipients, an unauthorized or unknown third party accessing electronic systems containing personal data, and access by an Employee who does not require the personal data in the course of their employment duties. Any questions about what constitutes an unauthorized access of personal data should be directed to Bioventus Compliance department

## 13 Disciplinary Policy

Bioventus prides itself on providing a comfortable and positive environment in which to work and in return expects high standards in terms of both performance and behaviour. All Employees are expected to conduct themselves in a manner that reflects these high standards.

Occasionally, however, there may be times where problems occur. Where possible, the Company aims to resolve such issues informally, but recognizes that some circumstances may require more formal steps, which may vary from a meeting, informal or formal warning, suspension from work or even dismissal.

Please note that the procedure set out below is only a guideline and the Company reserves the right to amend this procedure to accommodate the circumstances of the particular case.

### 13.1 Application of the Procedure

This procedure applies where Bioventus is contemplating disciplinary action to address poor performance or misconduct.

### 13.2 Paid Leave of Absence during Procedure

At any stage of a disciplinary procedure or before it begins, the Employee may be placed on a leave of absence with full pay, if appropriate. Full pay means the basic rate of pay to which the Employee is contractually entitled immediately prior to the period of the paid leave of absence. An Employee's contractual benefits will continue during any such period. A paid leave of absence does not amount to disciplinary action.

### 13.3 Disciplinary Action

Disciplinary action may take a number of forms: (the list below is not exhaustive and does not constitute mandatory steps):

- first written warning (for example for more serious problems regarding behaviour or performance, where a previous offence has been repeated or where performance has not improved despite earlier warnings);
- Final written warning (for example for further repetition or minor offences, persistent failure to meet previously set performance standards or serious problems with performance or behaviour);
- Dismissal (with notice) (for example, further or more serious repetition of behaviour which has previously led to a warning or failure to improve performance standards outlined in previous warning);
- Summary dismissal (without notice) (for example, for gross misconduct - see below); or
- Alternatives to dismissal such as suspension for a period of up to three months (without pay or part pay or demotion).

## **14 Social Media**

### **14.1 Social Media**

The Company recognizes that Employees may engage in social media while off duty. For purposes of this policy, “social media” means posting information on one’s own or on someone else’s blog, web log, journal, or diary on the internet. Social media also includes any other form of posting information on the internet, such as postings on a personal web site, social networking or affinity web site, on a bulletin board, or in a chat room. Examples of such sites include Facebook, Twitter, Instagram, LinkedIn, etc.

Refer to GPP13 – Use of social media and networking tools by Employees on the company’s intranet (Bionet) to review the full policy.

### **14.2 Media Relations**

The Director of Communications serves as the official company spokesperson, and any requests from the media for comments or information related to the business, operational, financial, or strategic matters of the company are to be referred immediately to the Communications Department unless specifically directed otherwise in a news release, internal announcement, or other official company communication.

Employees must obtain prior approval from the Communications department before engaging in any conversation or correspondence with the media, whether written, oral, or by email.

### 14.3 Employees Working from Home

Employees are responsible for ensuring the security of confidential information in their home. In particular, Employees undertake to:

- encrypt and/or protect by password any confidential information held on home computers;
- lock computer terminals whenever left unattended;
- ensure any wireless network used is secure;
- keep all papers in filing cabinets that are locked when not in use; and
- comply with the Bioventus' data protection policy from time to time in force regarding the retention of personal data.

For the avoidance of doubt, Bioventus property used at home shall remain the property of the Company and Employees shall not permit use of it by any other person (except for authorized representatives of Bioventus). Employees shall be responsible for any damage to Bioventus property which goes beyond ordinary wear and tear. Employees are required to report to Bioventus any such damage or malfunction of the property as soon as they become aware of it.

Employees who work from home shall be responsible for taking out and maintaining a valid policy of insurance covering the Bioventus property used at home against fire, theft, loss and damage throughout their employment. Employees shall not do, cause or permit any act or omission which will invalidate the insurance policy covering Bioventus property.

Subject to legal requirements, from time to time and on reasonable notice, Bioventus representatives may need to enter Employee's homes to:

- install, inspect, replace, repair, maintain or service the Bioventus property during employment;
- carry out health and safety risk assessments of the Bioventus property and the Employee's workstation during employment; and
- recover Bioventus property on or after termination of employment.

## 15 Whistleblowing

Bioventus is committed to ensuring that malpractice is prevented and, should it arise, immediately dealt with. Employees should be fully aware of to whom they can and should report public interest issues to. Bioventus encourages Employees to raise their concerns about any malpractice at the earliest possible stage and this procedure sets out the correct method for raising such concerns and the general principles of how matters should be dealt with.

This procedure applies to Employees, agency workers and contractors who have reasonable grounds to believe that malpractice has occurred, is occurring or is likely to occur within Bioventus. Employees are responsible for taking appropriate, reasonable and timely action wherever and whenever they become aware of any situation or matter that could lead to malpractice.

For the purposes of this procedure, Bioventus considers the following to be malpractice:

- the commission of a criminal offence;
- failure to comply with a legal obligation;
- the occurrence of a miscarriage of justice;

- the endangerment of an individual's or individuals' health and safety;
- the endangerment of the environment; and
- the concealment of any information pertaining to any of the above.

Wherever possible Employees must report public interest disclosure issues internally first.

Employees should initially discuss any concerns with their line manager, who will attempt to resolve the matter as soon as reasonably practicable.

If this is not appropriate or if an Employee reasonably considers that the line manager has not dealt with the concern sufficiently or at all, an Employee may then raise the concern with the next senior level of management. If an Employee is still dissatisfied with the decision or action taken, they should contact HR who will either deal with the matter or designate an appropriate management representative.

Any concerns will, so far as reasonably practicable, be dealt with in the strictest confidence at all times (bearing in mind the need to investigate allegations) and wherever possible the Employee's identity will not be disclosed, although it must be recognized that in certain circumstances it will be difficult for the complaint to be pursued or to tackle an alleged wrongdoer without the complainant's identity becoming known. This policy prohibits reprisals against workers who have made good faith reports under this policy. Workers who engage in reprisals or threats of reprisals may be disciplined up to and including termination of employment.

## 16. Attachment I IT acceptable Use Policy

### IT Policy and Procedure Information Technology Acceptable Use

#### **Purpose**

This policy establishes specific requirements for the use of all computing, data, and network resources at Bioventus. The information technology resources at Bioventus support the business activities of the company and the use of these resources is a privilege. As a user of these devices, services and facilities, you have access to valuable company resources, to sensitive personal data, and to internal and external networks. Consequently, it is important for you to behave in a responsible, ethical, and legal manner.

In general, acceptable use means respecting the rights of other computer users, the integrity of the physical facilities and managed services and all pertinent license and contractual agreements. If an individual is found to be in violation of this policy, Bioventus may take disciplinary action, including the restriction and possible loss of network privileges. Where local law is stricter or conflicts with this Policy, local law takes priority. In addition, this policy adheres to and supports the Bioventus Global Privacy Program.

#### **Scope**

The Acceptable Use Policy applies to:

- all Bioventus employees, contractors, third-parties and guests who use or have access to Bioventus Information via any means including but not limited to technology (IT) infrastructure, computer equipment, mobile devices and information including all third-party cloud computing IT solutions.
- any device, regardless of ownership and including equipment privately owned by employees, contractors and guests (i.e., laptops, tablets, smart phones, USB storage devices, etc.), but only with respect to ways in which they connect to or access Bioventus Information resources and activities they perform with those resources.
- all information that is owned by or entrusted to Bioventus.

#### **Responsibilities**

All Bioventus employees, contractors, third parties or guests are expected to:

- Understand and comply with the Acceptable Use policy;
- Be responsible for the information resources provided to you by Bioventus;
- Control unauthorized use of your information resources by preventing others from obtaining access to your computer and mobile device;
- Safeguard your Bioventus credentials and not use easy-to-guess passwords;
- Exercise good judgement in the use of Bioventus' technological and information resources;
- Acknowledge Acceptable Use Examples.

Manager: In addition to the above, each manager has a responsibility to:

- Ensure his/her employees understand and adhere to the Acceptable Use Policy
- Review and if appropriate, address adherence issues of his/her employees through additional training
- Report violations of this policy to IT security

## **Enforcement**

Any person who violates this Policy may be subject to appropriate disciplinary action or other remedial measures up to and including termination of employment if warranted under the circumstances and permissible under applicable law.

It is our expectation that all Bioventus employees and those working on our behalf will comply with the requirements of this Policy, our compliance policies and standard operating procedures. You are required to report any actual or suspected violation of Bioventus' policies related to this Policy to your manager or a Human Resources or Compliance partner.

Bioventus does not tolerate retaliation, including by threats, intimidation or harassment, against anyone who in good faith reports any concerns or possible violations regarding Bioventus' compliance with this Privacy Program.

## **Acceptable Use Examples**

### ***Passwords***

Acceptable:

- Use of a password manager application for storing *personal, non-Bioventus* passwords

Unacceptable:

- Giving your password to anyone – including Bioventus IT and the Service Desk.
- Storing your BV ID password in a password manager application
- Storing your BV ID password in a text file or Word document on your laptop
- Writing your BV ID password on anything in close proximity to your laptop or mobile device

## **EMail / *Electronic Communication***

Acceptable:

- Electronic communications are formal business communications, and users are expected to exercise the same care and professionalism in creating messages as they would when speaking on the phone or writing a letter or memo on behalf of the company.
- Electronic communications should be used when documentation of communication is needed or when it is deemed more efficient and effective than a telephone call or other written communication.
- General standards for electronic communications include:
  - Using only company-authorized electronic communications systems when messages contain confidential or proprietary company information
  - Using an access facility approved by Information Security when using company electronic communications systems with a remote connection

- Keeping messages as small in size as possible and limiting the distribution of messages that contain large attachments, graphics, or animation
- Using electronic communications in an ethical and lawful manner. Being accountable for the information sent over electronic communications systems by using electronic communications professionally and appropriately
- Using company electronic communications systems for company business (personal communications may be sent consistent with this policy as long as they do not interfere with normal business activities)
- Protecting confidential and sensitive company and personal information in accordance with company's Information Classification policy and Global Privacy Program.
- Preventing those outside the company from gaining access to company electronic communications resources except by prior approval of the Head of IT Security Operations.

**Unacceptable:**

- Conducting personal business via Bioventus email
- Forwarding your Bioventus email to a non-Bioventus, personal email account
- Emailing credit card information to anyone for any reason
- Using personal email for submitting sales orders or sending Protected Health Information (PHI), etc.
- Using any electronic communications systems or tools not provided by the company to distribute, comment on, or share confidential or proprietary company information
- Using electronic communications resources to distribute information that is inconsistent with company policy, contrary to the company's interests, or violates law
- Information that is obtained or used for personal gain (e.g., non-company for-profit business affairs)
- Defamatory, discriminatory, abusive, sexually oriented, harassing, obscene, threatening, or otherwise inappropriate information
- Information that is rumor or embarrassing in nature
- Sarcastic or inappropriate humor
- Information or data of any type that violates another's rights in copyrighted or trademarked materials by downloading, sending, or copying materials, files, etc., in violation of the terms of usage or license
- Chain letters
- Information about business activities that can be transmitted or captured more effectively via transaction-oriented systems (e.g., information that is usually captured or saved in files or databases)
- Business information for which well-defined audit trails are required including non-company advertisements or solicitations
- Responding to unsolicited or junk electronic communications and spam broadcasting messages of a personal nature or offering items for sale
- Disguising one's identity in electronic communications
- Purposefully wasting company computing resources or monopolizing those resources, which includes sending unnecessary mass mailings, printing multiple copies of documents, and subscribing to non-business list servers (discussion groups conducted through e-mail)
- Using systems other than e-mail to communicate information that is privileged and confidential-violations of this policy may result in disciplinary action including termination of employment.

**Computers (Laptops & Desktops)**

**Acceptable:**

- Responsible and ethical personal internet browsing when not interfering with business responsibilities and activities
- Connect to known or reputable public wireless networks (e.g. airport, train, coffee shops, etc.) and then immediately connect the Cisco AnyConnect Secure Mobility Client (VPN)
- Storing business-critical files on Bioventus network (H:\, N:\ drives, etc.), OneDrive, SharePoint or other authorized systems.

**Unacceptable:**

- Connect to any public wireless networks *and not* connecting the Cisco AnyConnect Secure Mobility Client (VPN)
- When at the office, connecting your laptop to the PURPLE (guest) wireless network

- Allowing family or friends to use a Bioventus laptop
- Leaving laptop and any printed material unattended or in plain view in a vehicle, on public transit, at airport, on airplane, etc.
- Long-term storing of business-critical files on your laptop's physical disk (Desktop, Documents, etc.)
- Use of torrents and similar services to download illegal content to a Bioventus device

### **Fax**

#### Acceptable

- Using Bioventus-approved electronic fax service: Concord Fax

#### Unacceptable

- Using a personal/at-home traditional fax machine instead of using Concord Fax
- Using unapproved electronic fax service: eFax, MetroFax, etc.

### **Cloud/Internet File Sharing**

#### Acceptable:

- Using Bioventus-approved file sharing service: Microsoft OneDrive, SharePoint

#### Unacceptable:

- Using unapproved file sharing services without authorization from Compliance: Dropbox, WeTransfer, Box, Google Drive, etc.

### **Mobile Devices**

#### Acceptable:

- Responsible and ethical personal internet browsing when not interfering with business responsibilities and activities
- Using approved Photo-to-PDF apps: Adobe Acrobat, Scanner Pro
- Using approved mobile phone or tablet operating system: iOS
- When at a Bioventus office, connecting your mobile device to the PURPLE (guest) wireless network

#### Unacceptable:

- Using any unapproved mobile phone or tablet operating system: Android, Windows Phone, B&N Nook, Amazon Fire, Galaxy, etc.
- Charging a non-iOS (ex. Android) via USB cable connected to your Bioventus laptop

### **Data Access & Usage**

#### Acceptable:

- Limit the collection of personal data, obtained by lawful and fair means, and where applicable, with the knowledge or consent of the data subject per EU GDPR
- Accessing, modifying, copying data based per the Bioventus Information Classification Policy and Global Privacy Program.
- With respect to the processing of sensitive personal data, some applicable laws (HIPAA & EU GDPR) require heightened privacy requirements.

#### Unacceptable:

- Looking up, reviewing, copying, modifying, deleting, analyzing, providing access, or handling information without proper authorization or legitimate business need
- Handling of data that violates the Bioventus Information Classification Policy or Global Privacy Program
- Failing to redact sensitive personal data and/or protected data prior to training / testing usage
- Including sensitive personal data / restricted data in testing documentation

## 17. Attachment II Information leaflet occupational health

### Your Medical Records and Confidentiality

Bcerta operates a secure medical information storage system via our IT system, BENE. You may, at some time, be asked to complete a confidential questionnaire on BENE but, if you prefer, we will make arrangements for it to be done on paper. You can also collect any personal reports via BENE. We have made BENE especially easy to use and you will receive instructions and guidance if you will be using it.

All occupational health records which currently exist will be transferred to be held confidentially by Bcerta within BENE under the direction of a senior Occupational Health Physician.

These are your personal occupational health records and you can access them if you wish. If you have any reason to object to the transfer of your records to Bcerta, please contact us.

**At no time will any confidential medical information be disclosed to your employer or any other party without your permission.**

### How to Contact Bcerta:

**134 – 138 West Regent Street,  
Glasgow  
G2 2RQ**

**Tel: 0141 243 2592  
Email: [info@bcerta.com](mailto:info@bcerta.com)  
Web: [www.bcerta.com](http://www.bcerta.com)**

**Twitter @Bcerta**



## Bioventus

**Your  
Occupational  
Health Service  
from April 2014**

## What is Occupational Health?

Occupational Health is a broad term and can encompass a range of activities including risk prevention, wellness promotion and attendance management, through to rehabilitation of employees back into the workplace following illness or accident. The role of the Occupational Health Service is to help maintain the health and fitness of employees from when they join the firm through all stages of employment until they exit the business.

Bioventus wishes to provide this support to all its employees.

## Who provides the Service?

Bcerta is a provider of Occupational Health services in the UK and internationally which is specifically relevant for Bioventus employees who have to travel from country to country.

The service is supplied by doctors and nurses who have additional qualifications in occupational health. They understand the working environment as well as any medical issues.

**Our staff are here to help you.**

## What Services does Bcerta provide for Bioventus?

We actively promote and develop a two-way relationship between work and health - providing support for Bioventus in the following areas: -

- ✧ Advice on health related policy and procedure
- ✧ Confidential storage of health information and medical records
- ✧ Pre-placement Health Assessments
- ✧ Travel Medical Assessments
- ✧ Health Surveillance – Driving, Noise, vibration, night working, confined spaces
- ✧ Health Promotion – e.g. workplace seminars, lifestyle and executive health screens



## What if I am sick?

If you are struggling with health issues at work or are off sick, you may be invited to speak to a doctor or nurse who will independently assess your condition and advise on how you can safely return to work. It is possible that we will recommend some adjustments to your work environment or tasks to help you if these are feasible.

- ✧ Attendance Management (Sickness Absence) support includes: -
  - Advice on fitness for work and any adjustments which the employer may be able to make to support your return
  - Advice to you to speed your recovery
  - Advice on rehabilitation back into the workplace following illness or injury
  - Arranging GP and Specialist reports
  - Advising on referral to other health professionals e.g. Physiotherapist, Counsellor etc.

**Consultations are confidential and no medical information will be reported to your employer.**