

<b>Policy #</b>	SOX 1.1
<b>Title</b>	Sarbanes-Oxley (SOX) Compliance Policy
<b>Version</b>	1.0 – Effective November 15, 2025

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## 1.0 Purpose

This policy outlines Bioventus’s approach to complying with the Sarbanes-Oxley Act of 2002 (SOX), specifically Section 404, which requires effective internal controls over financial reporting (ICFR). The goal is to ensure accurate, reliable financial statements, support fraud prevention and detection and ensure compliance with applicable laws and regulations.

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## 2.0 Scope

Applies to all employees, contractors, and third-party providers involved in financial reporting, accounting, internal audit, and IT systems supporting financial processes.

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## 3.0 Policy Statement

Bioventus is committed to maintaining strong internal controls to ensure accurate financial reporting and SOX compliance. This includes:

- **Designing and maintaining controls:** Controls address financial risks and ensure transaction accuracy, completeness, and proper segregation of duties. Includes entity-level, business process, IT general, and application controls. Documentation is maintained in RCMs, flowcharts, and narratives.
- **Testing controls:** Internal Audit conducts interim and year-end testing using defined methodologies (e.g., walkthroughs, documentation review, observation, re-performance).
- **Remediating deficiencies:** All issues are documented, assessed (control deficiency, significant deficiency, or material weakness), and resolved with corrective actions and retesting.
- **Training and awareness:** Control owners, performers, and reviewers receive SOX training. Awareness campaigns reinforce ethical reporting and fraud prevention.
- **Management certification:** CEO and CFO certify ICFR effectiveness quarterly and annually per SOX Sections 302 and 404, supported by testing and remediation status.

Bioventus follows the COSO Internal Control—Integrated Framework, which includes: Control Environment, Risk Assessment, Control Activities, Information & Communication and Monitoring.

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#### 4.0 Definitions

- **Business Process-Level Controls:** Transaction-level controls over revenue and expense processing, assets and liability management and approval workflows and reconciliations.
- **COSO Internal Control - Integrated Framework:** A widely used model for designing, implementing, and evaluating internal controls to support effective risk management and reliable financial reporting.
- **Entity-Level Controls:** High-level controls that shape the organization’s control environment, including: governance and oversight, ethical standards and conduct, and risk assessment practices.
- **Internal Controls Over Financial Reporting (ICFR):** Processes and procedures designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements in accordance with generally accepted accounting principles (GAAP).
- **IT Application Controls (ITACs):** Automated controls within systems to ensure data accuracy, including: input validation, processing logic and output integrity.
- **IT General Controls (ITGCs):** Support system reliability and security, including user access controls, change management procedures, and computer operations.
- **Sarbanes-Oxley Act of 2002 (SOX):** A U.S. federal law enacted to protect investors by improving the accuracy and reliability of corporate disclosures. It established requirements for financial reporting, internal controls, and auditor independence. Section 302 requires executives to certify the accuracy of financial statements and the effectiveness of disclosure controls, while Section 404 mandates management and auditor assessment of internal controls over financial reporting.
- **Segregation of Duties (SoD):** Ensure no single individual has control over all aspects of a financial transaction.

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#### 5.0 Roles and Responsibilities

- **Executive Management:** Certify ICFR effectiveness and allocate resources.
- **Control Owners:** Ensure controls are properly designed and maintained.
- **Control Performers:** Execute control activities as part of daily responsibilities.
- **Finance & Accounting:** Maintain records and implement controls.
- **Internal Audit:** Consult on control design, maintain documentation, test controls and report results.

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- **Internal Controls Team:** Prepare for 404(b) compliance and external auditor attestation.
  - **IT Department:** Maintain ITGCs and support financial systems.
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## 6.0 Reporting and Certification

- **CEO/CFO Certification:** Quarterly and annual ICFR certification aligned with SOX.
  - **Control Owner/Performer Certification:** Quarterly confirmation of control execution and documentation.
  - **Internal Audit Reporting:** Quarterly updates to management and Audit Committee on testing results, deficiencies, remediation, and certification
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## 7.0 Training and Awareness

All relevant personnel will receive periodic training on SOX requirements and internal controls.

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## 8.0 Policy Review

Reviewed annually by Internal Audit and updated as needed. Changes will be documented and communicated.

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## 9.0 References

- The Sarbanes-Oxley Act of 2002 (SOX), Sections 302 and 404
  - COSO Internal Control—Integrated Framework
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**Approvals**

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**Revision History**

Current Version	Major Changes	Reason for Change	Effective Date
1.0	Original Policy	Policy issued as part of SOX 404b preparation	11/xx/25