



# AtriCure

## Business Partner Conduct Standards

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At AtriCure, our first responsibility is to our patients, people, and partners. They are the reasons that we are dedicated to innovation and corporate integrity. We are defined by our mission to reduce suffering caused by atrial fibrillation and post-operative pain.

Our commitment to integrity means that we do business ethically and legally, with patients, people, and partners in mind. Through the **Code of Conduct and Global Health Care Compliance Manual**, AtriCure has established company standards for ethical business practices and legal compliance.

Just as AtriCure employees are expected to know and adhere to the Code of Conduct, AtriCure's Business Partners are expected to embrace and support AtriCure's commitment to integrity by complying with these **Business Partner Conduct Standards**.

## A. COMPLIANCE WITH THESE STANDARDS

AtriCure requires all Business Partners to read, understand, and comply with these Business Partner Conduct Standards (Standards) while conducting business with or on behalf of AtriCure. By "Business Partners," AtriCure means any individual, organization, or company (including their employees, agents, and subcontractors) that provide products or services to AtriCure or its customers including distributors, sales agents, independent contractors, consultants, suppliers, vendors and anyone else not employed by AtriCure who represents or acts on behalf of AtriCure in any capacity. "Business Partners" does not include AtriCure employees.

Business Partners must promptly inform the AtriCure Global Compliance department at [compliance@atricure.com](mailto:compliance@atricure.com) if any situation develops that causes them to operate in violation of this Standard. Business Partners are expected to monitor their activities and demonstrate compliance upon request. If, however, AtriCure becomes aware of or is notified of a concern, it may audit Business Partners to confirm compliance. AtriCure may require the immediate termination of the relationship and contract with the Business Partner, or any Business Partner's employee or representative, who behaves in a manner that is unlawful or inconsistent with these Standards. Compliance with these Standards is required in addition to any other obligations to AtriCure that the Business Partner may have.

## B. LEGAL AND REGULATORY COMPLIANCE PRACTICES

AtriCure expects that, as applicable, Business Partners will adhere to the following medical technology industry ethical standards:

- AdvaMed Code of Ethics on Interactions with U.S. Healthcare Professionals
- AdvaMed Code of Ethics for Interactions with Healthcare Professionals in China
- MedTech Europe Code of Ethical Business Practice
- APACMed Code of Ethical Conduct

Business Partners must conduct their business activities in full compliance with applicable laws, regulations, and standards, including:

### Global Trade and Security

- Complying with all applicable laws regulating global trade and services, such as those governing countries of origin, importation, customs entry, export, licensing, and sale of imported merchandise.
- Operating in full compliance with all applicable international trade control laws, regulations, and country-specific trade sanctions, including those issued by the United States Office of Foreign Assets Control.

### Anti-Corruption, Anti-Bribery, and Anti-Money Laundering

- Complying with all applicable anti-corruption and anti-bribery laws including, but not limited to, the U.S. Foreign Corrupt Practices Act and UK Bribery Act. Vendors may not offer, provide, solicit or accept anything of value directly or indirectly to a government official to exert improper influence or to obtain a benefit or advantage.
- Bribing, which can be anything of value, such as:
  - Gifts, meals, or entertainment
  - Favors
  - Offers of employment or internship
  - Loans or discounts that are not commonly available
  - Paid vacations or travel
- Complying with all applicable anti-money laundering and counter terrorism financing laws and regulations. Money laundering involves any process to make illegal funds seem legitimate.

- Not knowingly participating in a scheme to launder money related to criminal or terrorist activity or conduct business with any person identified as a terrorist by the United States or any other national or international organization.

## Competition and Antitrust Laws

- Conducting business in full compliance with applicable antitrust and fair competition laws.
- Avoiding unlawful agreements or understandings that improperly limit the supply or affect the price of goods or services provided to, or offered by, AtriCure.

## Boycotts

- Not participating in international boycotts that are not sanctioned by the United States government or applicable laws.

## Sustainability

- Operating in compliance with environmental laws and taking proactive steps to minimize environmental impacts, particularly in areas such as hazardous materials, air emissions, waste, and wastewater discharges, including the manufacture, transportation, storage, disposal, and release to the environment of such materials.

## C. BUSINESS PRACTICES AND ETHICS

Business Partners shall conform to the highest level of ethical business behavior and must:

### Product Quality and Safety

- Retain high standards of quality and safety to ensure satisfaction of our customers and the welfare of patients.
- Guarantee that goods sold to them comply with applicable laws regarding safety and that all manufacturers and subcontractors comply with the law.
- Report any concerns to [pcomplaints@atricure.com](mailto:pcomplaints@atricure.com) (worldwide) or [pcomplaintseu@atricure.com](mailto:pcomplaintseu@atricure.com) (EU only).

### Honest and Legal Conduct

- Not engage in any conduct which would, under any applicable law, constitute illegal activity, willful misconduct, fraud, theft, any criminal offense, or tortious deceit.

## Business Records

- Maintain and update accurate expense reports, timesheets, invoices, research data, clinical trial records, and contracts.
- Maintain and update accurate and timely financial and accounting records of all transactions related to their business with and on behalf of AtriCure.
- Create, retain, and dispose of such records as required by law and in accordance with any contract terms with AtriCure.

## Marketing, Promotion, Press and Media

- Comply with all laws regarding the marketing, promotion, and sale of AtriCure products and services.
- Not speak to the press or share information with media outlets (including social media outlets) on behalf of AtriCure without AtriCure's prior express written consent.

## Gifts

- Discourage gifts to employees and require that if a gift is to be given, it should be of nominal value and provided on an infrequent basis. Cash or gift cards are prohibited.
- Comply with the applicable code of ethics, as listed in Section B when interacting with health care professionals on AtriCure's behalf.

## Conflicts of Interest

- Be aware of and avoid conflicts of interest, including scenarios that may give the appearance of a conflict, such as occasions in which a situation would require whether to put AtriCure's best interests or the Business Partner's best interests first. This can occur in a variety of situations such as corporate opportunities, relationships with family members or significant others, outside employment or consulting, financial matters, or serving on Boards of competitors.
- Contact AtriCure's Global Compliance Department at [compliance@atricure.com](mailto:compliance@atricure.com) if unsure of whether a situation presents a conflict of interest.

## Insider Trading

- Not trade in securities while in possession of information that would be considered valuable to investors, such as earnings estimates, clinical trial results, or mergers and acquisitions nor disclose (or "tip") such information to others, as use of this type of information for trading, or tipping others to trade, is unethical and illegal.

## D. PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY

AtriCure relies on proper use of assets, including information, processes, and technology, to protect the financial well-being of the company. To help protect AtriCure's interest, Business Partners must:

### Intellectual Property and Use of AtriCure's Assets

Agree to following regarding Intellectual Property which includes company patents, trademarks, copyrights, trade secrets, and any other intangible assets created during business (e.g., ideas, inventions, etc.):

- Comply with confidentiality and relevant contractual provisions.
- Respect all AtriCure Intellectual Property rights.
- Acknowledge and agree that AtriCure owns all rights, title, and interest in and to the trademarks associated with AtriCure products and services.
- Further acknowledge all use of AtriCure trademarks and logos by Business Partner will be for the exclusive benefit of AtriCure.
- Use best efforts to protect AtriCure's rights related to AtriCure owned trademarks and logos and shall not challenge the validity of AtriCure's ownership.
- Respect all third-party proprietary or confidential information and intellectual property rights including, but not limited to, those with whom they do business on AtriCure's behalf.

### Confidentiality, Security, and Privacy

- Handle confidential information in compliance with applicable security and retention requirements. "Confidential information" means any non-public data, such as marketing plans, strategies, employee personal information, and intellectual property.
- Ensure that appropriate technical and security controls are in place to protect confidential information.
- Not outsource, disclose, share, or use the confidential information outside of their approved function. Unauthorized disclosures could harm AtriCure, breach any contract the Business Partner has with AtriCure, or even be illegal.
- Respect the privacy of individuals and their personal data and have processes to secure the protection of personal data.
- Comply with applicable global and local privacy laws and data protection requirements including HIPPA, GDPR, CPRA, and U.S. state privacy laws.

## E. HEALTH, SAFETY, AND LABOR

AtriCure is committed to a safe and healthy work environment for its employees and expects its Business Partners to share their commitment to human rights and equal opportunity in the workplace. Business Partners must:

### Work Environment

- Provide a work environment that fully complies with all applicable safety and health laws and regulations.
- Take adequate steps to minimize the causes of hazards inherent in the working environment.

### Labor Laws and Prevention of Human Trafficking

- Comply with all applicable laws relating, but not limited to, wages, working hours, working conditions, child labor, forced labor, and human trafficking.
- Procure raw materials or components for AtriCure's products solely from sources which follow these labor laws.

### Anti-Discrimination, Anti-Harassment, and Fair Labor

- Not engage in discrimination based on race, color, national origin, sex, religion, age, sexual orientation, gender identity, status as a protected veteran or an individual with disability, or any other protected group status or non-job-related characteristic as directed by applicable law.
- Maintain a Human Rights Policy which protects workers from unsafe conditions and protects them from unfair labor practices including forced labor and human trafficking.

## F. REPORTING QUESTIONABLE BEHAVIOR

Business Partners must report any activities they believe to be a violation of these standards. AtriCure provides multiple channels for reporting. Reports can be made to AtriCure's Global Compliance Department at [compliance@atricure.com](mailto:compliance@atricure.com) or through [SpeakUp.AtriCure.com](https://SpeakUp.AtriCure.com), a confidential, third party reporting tool. Retaliation of any kind against individuals reporting concerns in good faith violates AtriCure principles and will not be tolerated.

By working together, we can continue providing the quality products and services our customers and patients have come to expect from AtriCure.



Our reputation for excellence is built one decision at a time. Together, let's continue to lead with integrity, inspire trust, and uphold the high standards that define AtriCure.

Our future is bright – and it depends on all of us.

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