



Sanctions Compliance Policy

Purpose

Cordis as a multinational company is following a strong commitment to do business according to the highest ethical and compliance requirements to maintain sustainable business and to ensure that all our customers and patients have access to the best available technologies in the healthcare field.

This Sanctions Compliance Policy (hereinafter referred to as **"Sanctions Policy"**) describes how Cordis manages risks associated with international trade in various regions of the world and ensures compliance with sanctions laws and regulations. This Sanctions Policy supports the Cordis Standard of Business Conduct and Global Policies and Procedures.

Scope

This Sanctions Policy applies to all the Teammates at all the levels of the Company, including directors, managers, employees and contractors, wherever they are based (hereinafter referred to as **"Teammates"**), as well as to distributors, agents, official representatives, external consultants, and other third parties working for Cordis interests at the extent it is required by this Sanctions Policy and applicable sanctions program as outlined below (hereinafter referred to as **"Other Parties Subject to the Sanctions Policy"**).

Cordis management, with support of Legal & Compliance as well as Global Trade/Supply Chain, is responsible for implementing this Sanctions Policy throughout the company.

This Sanctions Policy represents the minimum standard. Cordis may adopt additional procedures, guidelines and other internal documents to ensure compliance with rapidly changing sanctions laws and regulations.

1. Background

1.1. Sanctions Laws Definition and Nature.

Sanctions laws are the laws, rules and regulations implemented by national governments, unions or supranational organizations with the objective of controlling, prohibiting or restricting financial or trade activity with certain countries, businesses, legal entities or individuals, as well as individuals and entities owned or controlled by such persons (**"Sanctioned Parties"**). They might be imposed by the United Nations Organization and enforced by national governments who are members of the UN Organization. In addition, the United States of America, the European Union, Switzerland, United Kingdom, Canada, Australia, New Zealand, as well as other countries impose their own sanctions regimes. Sanctions can either be across-the-board, blocking a broad range of financial or trade activity with specific countries, including all companies, organizations and individuals from those countries regardless of where they do business, or they may prohibit dealing with specific individuals or entities whose assets are frozen. They may also prohibit exporting or importing particular goods or technology or certain types of transactions only.

Financial sanctions primarily work by freezing the assets of specific individuals or companies and/or by limiting the scope of transactions that people or businesses can undertake with specific individuals, companies or, in some cases, industries or countries. They are used by governments to target specific risks such as terrorism, human rights abuses and breaches of international law.

Trade sanctions restrict the transfer of specific goods, services and technology across borders. In most cases this applies to goods with a military or intelligence application or purpose, but it can apply to so-called "dual use" items, which are items that can be applied for both civilian and military purposes.

Sanctions laws may include also limited or full travel bans.

Breaches of sanctions laws and regulations may be followed by significant civil and criminal penalties. Sanctions often apply extraterritorially, meaning they can apply to the activities of Company and our Teammates and representatives wherever they are located.

Definition of Sanctions Laws for the Purposes of this Sanctions Policy includes sanctions programs applied by Cordis as listed in section 1.2. below.

1.2. Sanctions Programs Applied by Cordis

Cordis as a multinational company operating worldwide, applies sanctions programs of the following countries, unions and supranational organizations:

- ✓ United Nations Organization,
- ✓ United States of America,
- ✓ European Union,
- ✓ Switzerland
- ✓ and other countries where Cordis offices are located.

Cordis also takes into consideration other sanctions programs wherever required due to nature and geography of business operations as well as due to the structure of the supply chain.

In the case of any discrepancies between sanctions programs and international trade regulations adopted by these countries and supranational organizations the stricter rules will prevail.

Brief overview of the USA, EU and Switzerland sanctions regimes is provided on the Annex 1 to this Sanctions Policy.

2. General Rules of Sanctions Compliance at Cordis

All Cordis Teammates are expected to comply with general rules outlined below.

2.1. General Restrictions

Cordis and its Teammates will not maintain, permit, facilitate or undertake any activity or conduct which would result in breaching this Sanctions Policy or any applicable Sanctions laws.

Cordis and its Teammates will not directly or indirectly do business or enter any transaction with any Sanctioned Party, including any commercial, educational, marketing, financial, manufacturing activities and

any other transactions. Cordis will ensure that its Teammates refrain from doing business (on behalf Cordis) with any Sanctioned Party in a manner that would be in breach of any applicable Sanctions Laws.

Cordis will ensure that if an individual or entity becomes subject to sanctions under any sanctions program applied by Cordis (as listed above), any business with such an individual or entity will either be terminated or duly restricted, to the extent such a termination is required by the applicable Sanctions Laws.

2.2. Doing Business in Countries under Sanctions Programs

Distribution of live-saving medical devices is usually a part of humanitarian trade allowed by sanctions programs to ensure that population of sanctioned countries has access to healthcare and medical support. Cordis supports, when possible, such humanitarian trade values and activities, at the same time adheres to responsible, sound and diligent approach to compliance with applicable international trade laws, regulations and sanctions programs.

Before starting any new business activities in the countries listed in Annex 2 to this Sanctions Policy originator of such initiative is required to provide all necessary information to Legal&Compliance as well as Global Trade/Supply Chain Business Partners for assessment new initiative is compliant with applicable Sanctions Laws and what measures need to be taken (enhanced due diligence, general terms and conditions of trade in particular sanctioned country, if any licenses, permits, special reporting to competent authorities is required, sanctions-related contractual terms and conditions, etc.). All new business initiatives in the countries listed in Annex 2 to this Sanctions or engaging with individuals, entities activities closely connected with these countries (having citizenship or permanent place of residence in these countries, entities having beneficial owner from listed countries, export-import operations with goods or services originating from these countries etc.) require approval from Legal&Compliance as well as Global Trade/Supply Chain Business Partners.

2.3. Sanctions Screening as a part of Third-Party Risk Management (Due Diligence)

Cordis conducts risk-based Due diligence of third parties (distributors, agents, other third-party sellers, higher risk vendors and supply chain in general, including end-users, banking channels, as well as other third parties when it is required by responsible Legal&Compliance and/or Global Trade/Supply Chain Business Partners). Such Due diligence procedures might include screening via public sources, dedicated tools (such as Dow Johnes Riskcenter and other similar databases), requesting materials from specialized vendors etc. In case of doubts external legal advice might be obtained to assess if transactions with specific third party are allowed by applicable sanctions laws and regulations.

All Cordis Teammates and contractors as well as Other Parties, Subject to this Sanctions Policy, must adhere to applicable internal processes prior to entering into a transaction or agreement with any third party, including but not limited, measures required by this Sanctions Policy, Third Party Risk Management (Due Diligence) process that is governed by Cordis GPP 6 (Third Party Risk Management).

2.4. Sanctions and Trade Compliance Contractual Clauses

Whenever Cordis engages Third Party Intermediaries (distributors, agents, other third-party sellers), as well as vendors that might potentially interact with and engage with Sanctioned Parties, Cordis will set up standards of due diligence and sanctions compliance provisions in the respective contracts when necessary. All Cordis Teammates and Other Third Parties Subject to this Sanctions Policy, are expected to follow guidance from the responsible Legal&Compliance and /or Global Trade/Supply Chain Business Partners regarding applicable contractual clauses and templates.

2.5. Travel to Sanctioned Countries

This Sanctions Policy does not prohibit personal or business travel to countries, listed in Annex 2. However, it is highly recommended to get prior advice and approval of Legal&Compliance as well as HR Business Partners before business travel to the following countries and territories: Iran, Cuba, North Korea, Crimea, Donetsk, Luhansk, Zaporizhzhia, Kherson to assess potential risks for Cordis business and Teammates personally.

Teammates should also consult their own Embassies/Foreign office and/or similar national/international bodies to seek advice for such travel based on the passport(s) / Nationality(ies) they hold.

3. Sanctions Compliance Program Requirements

3.1. Risk Assessment, Monitoring, Audits

Cordis will conduct periodic sanctions risk assessments and audits to determine Cordis risks level in the field of sanctions compliance.

Cordis Chief Legal Officer will perform, or facilitate to be performed, the periodic risk assessments, monitoring and/or audits to evaluate whether there have been changes in law, practices or Cordis business operations that require adjustments to this Sanctions Policy, Cordis Company Statement on Sanctions Compliance, any other relevant Cordis policy, procedure, guidance, contracts templates and other documents. Necessary mitigation steps will be taken to address any potential gaps in Cordis sanctions compliance program, trainings and other appropriate measures.

3.2. Policies, Procedures and Internal Controls

Cordis implements policies, procedures, guidelines and other internal documents aiming to properly identify, assess and mitigate risks and ensure compliance with applicable sanctions programs and international trade regulations at all the company levels.

Cordis will maintain reasonable internal controls in place to ensure compliance with all applicable sanctions laws and regulations and this Sanctions Policy. Cordis Chief Legal Officer together with Global Trade / Supply Chain management will facilitate the implementation of policies and internal controls tailored to Cordis operations to appropriately mitigate company sanctions compliance risks.

3.3. Liaisons with Competent Authorities and External Consultants

Cordis initiates contacts with competent authorities responsible for enforcement of respective sanctions programs in case of any unclarity with sanctions laws and regulations applications.

Cordis might also approach competent authorities in the case if any specific license, permit, individual judgement or opinion is required for Cordis business operations.

Cordis may also engage external consultants to obtain independent professional opinion on particular questions of sanctions compliance, to support license applications or similar requests to competent authorities.

3.4. Training and Informing Teammates on Sanctions Updates

Cordis Chief Legal Officer together with Global Trade/Supply Chain will ensure that all responsible Teammates, as well as Other Third Parties Subject to this Sanctions Policy, are properly informed and trained on this Sanctions Policy, relevant procedures, guides, and other internal documents implemented at Cordis. All training records, including name, title and contact information for each trainee, should be retained as for all other compliance trainings at Cordis.

Legal&Compliance together with Global Trade/Supply Chain will be monitoring applicable sanctions laws and regulations updates and inform all the involved Teammates with appropriate recommendations on the steps to be taken respectively to the current or anticipated in future Cordis business operations.

3.5. Reporting

In a case of any actual or potential violations of this Sanctions Policy or applicable Sanctions Laws, as well as in a case of any doubts on sanctions compliance at Cordis all Cordis Teammates and Other Third Parties Subject to this Sanctions Policy are obliged to immediately report this information or their doubts to Cordis Chief Legal Officer, responsible Legal & Compliance Business Partner, and/or Global Trade/Supply Chain Business Partner, or via any other way applicable to reporting compliance issues at Cordis.

3.6. Responsibility

Any Cordis Teammate who does not adhere to this Sanctions Policy and Sanctions Laws may be subject to disciplinary action up to and including termination in addition to any other potential actions or penalties resulting from a breach.

Any Other Party Subject to this Sanctions Policy who does not adhere to this Sanctions Policy and Sanctions Laws might be terminated by Cordis or otherwise restricted in further cooperation with Cordis according to applicable contract terms and conditions.

4. Policy Reviews

This Sanctions Policy is subject to periodic reviews depending on the sanctions laws and regulations updates.

Approvals

Authors:	Head of Legal and Compliance Emerging Markets	Date:	August 18, 2025
Approved by:	Trade Compliance and Transportation Manager, EMEA	Date:	August 26, 2025
Approved by:	General Counsel & Compliance Officer EMEA and ANZ	Date:	August 26, 2025
Approved by:	Chief Compliance Officer	Date:	August 28, 2025
Approved by:	Chief Legal Officer	Date:	August 28, 2025

Revision History

Current Version	Date	Major Changes	Reason for Change
1.0	September 01, 2025	New Policy	New Policy

Annex 1

Sanctions Programs Overview

This brief overview is provided rather for information and educational purposes. Cordis Teammates are not expected to make their own decisions on the new initiatives in the countries listed in Annex 2. For legal and trade compliance advice please approach your responsible Legal&Compliance Business Partner or Global Trade/Supply Chain Business Partner.

1. United States of America Sanction Program

The U.S. maintains sanctions against or related to: (1) certain countries; and (2) persons or entities engaged in certain activities. Country sanctions usually preclude any business activities in those countries or with the target country's entities or persons. In addition, agencies of the U.S. government have designated persons, entities and other identifiable subjects on a prohibited parties list known as the "List of Specially Designated Nationals and Blocked Persons" (the "*SDN List*"). Persons or entities on the SDN List are targeted for their conduct or activity (for example, terrorism or human right violations). The Office of Foreign Assets Control ("*OFAC*") may also place persons or entities on the SDN List.

1.1. OFAC at the U.S. Treasury Department is the competent authority that administers the U.S. sanctions programs against targeted countries, entities, and individuals. OFAC has wide discretion to interpret and enforce its regulations based on the foreign policy goals of the U.S. Government.

1.2. US Persons.

U.S. sanctions apply to "U.S. persons," including:

- U.S. companies and their domestic and foreign subsidiaries or branches;
- any individual who is a U.S. citizen or permanent resident (green card holders), regardless of their location in the world;
- any individual located in the U.S., regardless of their nationality.

In the case of U.S. sanctions applicable to Cuba, Iran, and North Korea, the sanctions specifically apply to all foreign subsidiaries of U.S. companies and any other entities owned or controlled by U.S. persons.

1.3. Country-related sanctions.

US government introduced two types of **country sanctions programs**: comprehensive and limited sanctions programs.

1.3.1. Comprehensive country-related sanctions prohibit U.S. persons from dealing in any manner with sanctioned countries and/or their governments. The U.S. currently maintains comprehensive sanctions against Cuba, Iran, Crimea, Donetsk People's Republic (DNR) and Luhansk People's Republic (LNR) regions (disputed regions between Ukraine and Russia), North Korea.

Usually comprehensive sanctions prohibit transactions with, or services in, from, or benefitting, the country and its government. The country sanctions may apply to transactions outside the country. Cuban sanctions program prohibits engaging in transactions with Cuban nationals (persons or entities) located in countries outside of Cuba (except the U.S.) or Cuban goods outside of Cuba. Iran sanctions apply outside of Iran to transactions involving the Government of Iran or entities that are owned or controlled by the Government of Iran etc. However, exceptions might be possible for certain transactions under general licenses provided by the US government as a part of sanctions laws and regulations or issued by the US competent authorities as specific licenses.

1.3.2. Limited country sanctions programs prohibit U.S. persons from participating in certain types of business activities with sanctioned countries and respective governments such as providing services, financing, investments, exports, and/or imports. The scope of restricted activities might differ significantly country by country. U.S. sanctions programs are published on the OFAC website at Sanctions Programs and Country Information. Usually, OFAC enforces the limited country sanctions programs by placing prohibited persons or entities on the SDN List.

1.4. Special Designated Nationals.

In addition to country sanctions, U.S. persons are required to abstain from dealing with individuals, entities and organizations that have been designated by the U.S. Government due to specific conduct or actions (terrorism, narcotic trafficking, human rights violations etc.). These parties are also identified on the SDN List.

1.5. Prohibited dealings. The scope of prohibited interactions under country-related sanctions programs or other US sanctions programs enforced via designation of individuals or entities as SDNs depend a lot on laws and regulations relevant to particular sanctions program.

In general U.S. persons are prohibited from **direct dealings**: transacting in any way with sanctioned countries and SDNs. This includes the provision, directly or indirectly, of goods, services, or any benefit to the target at any point. U.S. law usually prohibits direct and indirect imports from the targeted countries.

Indirect Dealings. U.S. sanctions laws and regulations prohibit U.S. persons from “approving or facilitating” dealings with sanctioned countries or parties by non-U.S. persons (**facilitation**). This prohibition covers approval, financing, or other support of such transactions, including any technical or operational support from a U.S. company; referring business requests from a Sanctioned Party to a third party; transacting business for an entity that might be acting for the benefit of a Sanctioned Party.

U.S. sanctions laws and regulations also prohibit transactions that evade or have the purpose or effect of evading US sanctions restrictions (**evasion**).

Foreign sanctions evaders sanctions prohibit US Persons from engaging in virtually all business and dealings with individuals and entities who have attempted to violate or assisted others to violate US sanctions against certain countries (for instance, Iran).

1.6. Sectorial Sanctions.

In addition to list-based and comprehensive sanctions, the U.S. maintains a third type of sanctions related specifically to Russia and Belarus. These restrictions are usually referred to as sectoral sanctions. OFAC designates entities to the Sectoral Sanctions Identification ("SSI") List; only particular types of transactions with individuals and entities on the SSI List are prohibited.

1.7. Licenses and Interpretative Rulings

US government may grant general exceptions from sanctions restrictions directly in the respective sanctions law or regulation (general license). As an example, in many sanctions programs there is a general license for import of drugs and medical devices into the affected country.

OFAC is also authorized to grant exceptions through a specific license, issued upon request from the interested company.

OFAC also issues interpretative rulings about the scope and specific questions related to the U.S. sanctions (FAQs) for public awareness or upon specific requests from the companies.

1.8. Penalties

Civil and/or criminal penalties may be imposed on the US persons for sanctions violations regardless of level of awareness and intent to violate US sanctions.

Personal liability for US sanctions violation.

Individuals may be subject to civil fines up to \$250,000 per violation or twice the value of the transaction, whichever is greater. Individuals who willfully commit violations of U.S. sanctions can be subject to criminal penalties, including fines up to \$1 million and/or imprisonment up to 20 years depending on the sanctions program.

Company Liability and Reputation Damage

Cordis as a company may be subject to civil fines up to \$330,947 per violation and possible criminal prosecutions and fines up to \$1,000,000 for each willful violation of U.S. sanctions laws or regulations. Cordis might be also exposed to cease-and-desist orders and to being barred from doing business with the federal or state governments in the USA.

Sanctions violations may also result in adverse publicity for Cordis and may have a serious effect upon Cordis business reputation.

Cordis directors, officers and other Teammates who participate in violations of U.S. sanctions may be subject to individual civil and criminal penalties for their actions.

1.9. Secondary Sanctions

Secondary sanctions is a tool the US government uses to make liable **non-U.S. persons** engaging in certain sanctioned commercial activities in or with certain sanctioned countries. Secondary sanctions have extra-territorial **nature** and applied to the entities and individuals originating from or residing outside the USA. Enforcement is indirect because the U.S. government cannot impose fines and penalties on a non-

US person violating secondary sanctions. Instead, the U.S. government may limit non-U.S. persons' access to the U.S. commercial market, government programs, and financial system.

2. European Union Sanction Program

The EU has over 40 different sanctions regimes in place. Some are mandated by the United Nations Organization, others are adopted autonomously by the EU.

Decisions on the adoption, renewal, or lifting of sanctions regimes are taken by the Council of the European Union, on the basis of proposals from the High Representative of the Union for Foreign Affairs and Security Policy. Once adopted, EU laws are published in the Official Journal and from this moment they come into force.

EU sanctions are usually enacted in the form of regulations, meaning they come into force without the need for national transposition and become directly binding in the EU Member States.

EU member states may implement additional measures that exceed EU measures, so it is important to comply with both EU and regional laws on sanctions.

EU sanctions can target individuals, entities, other organizations or groups, governments of non-EU countries. EU sanctions may include following measures:

- embargoes,
- partial and full transaction bans, including sectorial sanctions as prohibitions to enter certain transactions with certain listed individuals or entities (usually by industry),
- restrictions on imports and exports of goods and services,
- restrictions on admission (travel bans),
- asset freezes, investment bans and other financial measures,
- other economic measures.

In some cases, directly indicated by the EU sanctions laws, competent authorities might issue a special permit or a license (derogation) to provide exception from these restrictions.

EU sanctions apply to all individuals and entities within the EU, EU nationals, and non-EU branches of EU-incorporated entities. EU sanctions also apply to any non-EU legal person, entity or body in respect of any business being done in whole or in part within the EU.

In 1996 EU adopted a blocking statute aiming to protect EU operators from the extra-territorial application of third country laws. The European Union does not recognize the extra-territorial application of laws adopted by third countries and considers such effects to be contrary to international law. EU blocking statute protects EU operators engaged in lawful international trade and/or movement of capital, as well as related commercial activities, against the effects of the extra-territorial legislation (US sanctions programs concerning Cuba and Iran).

The blocking statute protects EU operators, regardless of their size and field of activity, by

- nullifying the effect in the EU of any foreign court ruling based on the listed foreign laws;
- allowing EU operators to recover in court damages caused by the extra-territorial application of the specified foreign laws.

The blocking statute prohibits compliance by EU operators with any requirement or prohibition based on the specified foreign laws.

Liability for violation of the EU sanctions is implemented and applied on a country level of the EU Member States.

However, in 2024 EU adopted a Directive setting minimum criminalization standards for sanctions violations that has to be implemented by the EU Member States. Basic requirements under this EU Directive include:

- ✓ The obligation for the EU Member States to treat intentional violations of EU sanctions as criminal offences. The EU Sanctions Directive extends liability to serious negligence in cases involving items on the EU's Common Military List or dual-use items.
- ✓ The obligation to ensure that legal persons (i.e. companies) can be held liable for criminal offences related to sanctions violations, with penalties including fines.
- ✓ The obligation to adhere to minimum requirements concerning maximum penalties for both natural and legal persons.
- ✓ The obligation to provide minimum limitation periods for criminal offenses, allowing sufficient time for investigation, prosecution, trial, and adjudication. These periods generally include at least five years for serious sanctions violations.

3.Switzerland Sanction Program

Switzerland as a non-EU country has its own sanctions program and respective laws and regulations, however it is often joining to the EU sanctions laws, but with certain waivers.

Swiss sanctions regulations only apply to individuals and legal entities residing and/or accomplishing their commercial activities in Switzerland.

State Secretariat of Economic Affairs (SECO) is a competent authority responsible for sanctions implementation and enforcement in Switzerland.

4. UK Sanction Program

The Foreign & Commonwealth Office has overall responsibility for UK sanctions and HM Treasury is responsible for administering and enforcing UK sanctions. The UK sanctions regime replicated in general the EU regime until the end of 2020, after which further divergence is developing.

Please contact your responsible Legal&Compliance Business Partner and Global Trade/Supply Chain Business Partner to get more information on national country sanctions program.

Annex 2

As of the date of this Policy sanctions programs applied by Cordis (section 1.2 of this Sanctions Policy) have been imposed in respect of the following countries:

EMEA	Central and Latin America	Middle East	Asia	Africa
Armenia Azerbaijan Belarus Russia Turkey Ukraine Western Balkans (Serbia, Bosnia&Herzegovina)	Cuba Guatemala Haiti Venezuela Nicaragua	Iran Iraq Lebanon Libya Syria Yemen	Afghanistan Burma (Myanmar) China Hong Kong (China SAR) North Korea	Central African Republic Democratic Republic of Congo Eritrea Ethiopia Guinea Guinea-Bissau Mali Niger Somalia South Sudan Sudan Tunisia Zimbabwe

Please note that individuals or entities from the countries beyond this list might be sanctioned as a part of secondary sanctions measures.

This Annex 2 is subject to amendments from time to time due to the changes in the applicable Sanctions Laws.