

1.0 Purpose

- 1.1 AtriCure is committed to conducting business in accordance with the highest ethical standards and prohibits all forms of bribery and corruption. Through the [Code of Conduct](#) and the [Business Partner Conduct Standards](#), AtriCure has established the foundation for ethical business practices and regulatory compliance by all its employees, board members and business partners.

As a medical device manufacturer, AtriCure encounters third parties capable of influencing medical, regulatory, or business decisions, including government officials, Healthcare Professionals (HCPs) and Healthcare Organizations (HCOs).

This Anti-Corruption Policy prohibits bribery of government officials or private sector bribery, including the offering, promising, authorizing or providing anything of value in order to induce or reward the improper performance of an activity on behalf of AtriCure. No AtriCure employees, board members and business partners, may directly or indirectly solicit or accept anything of value intended to unduly influence the decision of AtriCure employees in their job responsibilities or intended as a personal benefit for having made a decision unduly benefiting the person or entity offering the bribe.

All AtriCure employees, board members and business partners are expected to comply with applicable Anti-Corruption laws, including but not limited to, the US Anti-Kickback Statute, the US Foreign Corrupt Practices Act, the UK Bribery Act, and similar laws in other countries where AtriCure does business.

All AtriCure employees, board members and business partners are expected to comply with the main industry codes in the countries where AtriCure operates, including the AdvaMed Code in the United States, the MedTech Code in Europe, the AdvaMed China Code, and the ApacMed Code in Asia Pacific.

- 1.2 This Policy highlights the requirements for compliance and employees' responsibilities, along with the tools and support necessary to avoid anti-corruption risks.

2.0 Scope

- 2.1 This Policy applies globally to AtriCure employees, temporary workers, board members, and business partners (collectively referred to as "Covered Persons") on their interactions with third parties and government agencies or officials on behalf of AtriCure or at the direction of AtriCure.

If there is a conflict between the terms of this Policy and any applicable laws or regulations, Covered Persons must adhere to the most restrictive standard.

This Policy covers subjects related to:

- Items of value
- Improper payments
- Political contributions
- Charitable donations
- Third Parties



3.0 References

3.1 References listed below are applicable to this Policy.

Title
AtriCure Code of Conduct
Code of Ethics for CEO and Senior Financial Officers
AtriCure Business Partner Conduct Standards
AtriCure Records Information Management Policy
AdvaMed Code of Ethics on Interactions with U.S. Healthcare Professionals
AdvaMed code of Ethics on Interactions with Healthcare Professionals in China
MedTech Europe Code of Ethical Business Practice
APacMed Code of Ethical Conduct

4.0 Definitions

Term	Definition
Anything of Value	Interpreted broadly to mean anything that could directly or indirectly benefit the recipient in any way.
Bribery	Refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting Anything of Value so as to induce or influence an action or decision in order to gain commercial, contractual, regulatory, or personal advantage.
Business Partners	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, suppliers, vendors, and anyone else not employed by AtriCure who represents or acts on behalf of AtriCure in any capacity, in any countries.
Corruption	It is the misuse of entrusted power, in a professional context, for personal gain or for the benefit of a third party.
Facilitation Payment	A payment, offer, or promise to pay, or authorization of the offer, promise or payment, directly or indirectly (through one or more intermediaries), of any money, benefit, or anything of value to a Public Official, usually at a low level, for the purpose of expediting or securing a routine action ordinarily performed by such Public Official.
Government Official	Government employee or elected or appointed official, political party, candidate for political office, employees of a government or agency, employees of government affiliated entity, healthcare professional working in a public or government-sponsored healthcare program, official or employee of a public international

	organization, employees of companies or organizations partially or wholly owned or controlled by a government.
Improper Payment	The offer, provision, or authorization of bribes, kickbacks, corrupt payments, or anything of value in exchange for an improper business advantage.
Improper Advantage	Any business, regulatory, medical, legal or other determination or agreement that has been influenced by the provision of Anything of Value to any individual or entity to induce such an individual or entity, implicitly or explicitly, to act, influence, or fail to act in any such determination. Examples of situations where improper advantage could take place, but not limited, to influencing a contract awarding, cancellation of a contractual obligation, obtaining a license, permit or other authorization. In the private business, obtaining business confidential information from other companies is an example of an improper advantage.
Items of value	Any item or service from which a recipient gains actual or imputed value, including, but not limited to: <ul style="list-style-type: none"> • Educational items • Gifts, regardless of type or amount of value; • Hospitality, including travel, lodging, meals, expenses; • Entertainment, including sports tickets or other recreational activities; • Proprietary, confidential, or other non-public information; • Promises of current or future employment or business relationships; • Beneficial treatment; • Cash or cash equivalent payments of any kind; • Additional discounts or rebates; • Provision of service not provided for by the contractual relationship; • Facilitation payments or incentives for government actions; • In-kind contributions; • Grants or sponsorships; • Political contributions or lobbying expenditures • Charitable or other donations; • Speaker fees or honoraria; and • Reduction or forgiveness of any obligation (e.g., debt)
Third Party	Any individual or entity that AtriCure employees come into contact with during the course of their work and includes actual or potential clients, customers, suppliers, distributors, business contacts, agents, advisors, government and public bodies, including their advisors, representatives and officials.

5.0 Roles and Responsibilities

5.1 AtriCure employees and board members are responsible for understanding and complying with this Policy, including training and other Anti-Corruption information provided.

Employees are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption.

They are required to avoid any activities that could lead to, or imply, a violation of this Anti-Corruption Policy.

Those AtriCure employees responsible for Business Partners must communicate with them about this Policy's requirements.

AtriCure has a strict non-retaliation policy for employees who report concerns in good faith and refuse to participate in bribery schemes.

In the event an employee or a business partner suspects that a conflict with or a breach of this Policy has occurred or may occur, they must immediately notify their manager, the Compliance department or the AtriCure [Ethics Hotline](#).

6.0 General Procedure

6.1 Educational Items & Hospitality

Educational items may be given to HCPs if they serve a genuine educational purpose, is related to their specialties and/or benefits patients. It is allowed only when in compliance with applicable local requirements, including local Codes of Ethics (See Section 3.0).

AtriCure may provide hospitality when it is associated with the promotion and/or demonstration of our products, the performance of a contract, for professional education development, or for other legitimate business purposes. The offered hospitality must be reasonable, subordinate in time and focus to its purpose. Employees must not offer or give educational items and/or hospitality in exchange for any improper advantage.

6.2 Prohibition of Improper Payments

All Covered Persons are prohibited from offering, providing, authorizing or receiving any improper payments to or from an individual or entity, public or private.

Covered Persons are prohibited from soliciting, receiving, or accepting anything of value that appears to or demonstrates improper payment from any individual or entity.

Covered Persons are prohibited from directing any third party, implicitly or explicitly, to act in violation of this Policy (and associated policies) or applicable laws and regulations.

Any attempt to obtain an improper advantage shall violate this Policy, without regard to whether the intended recipient accepted the improper payment or actually provided an improper advantage.

6.3 Books and Records

AtriCure is committed to maintaining complete and accurate financial books and records to adequately account for all expenditures or exchanges of value.

All expenses must be accurately accounted for, include appropriate supporting documentation, and entered in company records prior to its reimbursement. It includes, but is not limited to, the accurate identification of all payments to third parties acting for or on behalf of AtriCure.

False, misleading, incomplete, inaccurate, or artificial documenting, reporting or recording of payments or activities is strictly prohibited.

6.4 Political Contributions

AtriCure does not make political contributions, whether in kind or in cash, in support of any political parties or candidates.

6.5 Third Parties

AtriCure uses third parties to sell and distribute its products.

Under the FCPA, the U.K. Bribery Act and many other countries' anti-bribery laws, it can be held liable for the illegal acts made by third parties in connection with its businesses.

The company may also be held accountable for failing to take sufficient action to prevent third parties to participate in corruptive conduct, whether or not being aware of the alleged improper behavior.

To mitigate risks, AtriCure has implemented the due diligence process for third parties. It is a documented investigation into third parties' background, reputation and business capabilities. There are certain red flags that may trigger the refusal of a third party, such as rumors of or reputation for bribery, expense claims involving a lump sum, large commissions, or payments, and third parties closely related to public officials.

Any employee seeking to establish a business relationship between AtriCure and a third party must follow the legal requirement of a valid and approved contract before engaging the third party. No contract should be concluded until the due diligence is completed satisfactorily and approved by Legal and/or Compliance.

All third parties conducting business with, for or on behalf of AtriCure are required to act with the highest level of business integrity.

6.6 Monitoring

The Compliance Department is responsible for periodic monitoring and auditing compliance with this Policy.

6.7 Reporting and Non-Retaliation

Covered Persons must report any activities they believe to be a violation of this Policy to the AtriCure Compliance Department through compliance@atricure.com. Reports may also be made anonymously through atricure.ethicspoint.com or through the EthicsPoint hotline phone numbers. AtriCure prohibits retaliation for reports of suspected misconduct. Questions may be directed to the AtriCure Compliance or Legal Department. Hotline information is contained within the AtriCure Code of Conduct, our company website, and intranet locations.

6.8 Communication and Training

The Compliance Department will determine and direct the appropriate communication and training for this Policy.

6.9 Compliance

Failure to comply with the terms of this Policy may subject the individual to disciplinary action, up to and including termination of employment.

7.0 Forms

7.1 No forms associated with the document

8.0 Appendix or Attachments

8.1 No attachments or Appendix to the document

Effective Date: 01/05/2023