

	<b>Anti-Bribery Anti-Corruption Policy</b>	Document #	<b>POL-740-503</b>
		Rev	<b>05</b>

## 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, Global Health Care Compliance Manual, AtriCure Business Partner Conduct Standards, and this Anti-Bribery Anti-Corruption (ABAC) Policy, AtriCure has established the foundation for ethical business practices and regulatory compliance by all its employees, board members, and Third Parties (referred to as Covered Persons).

As a medical device manufacturer, AtriCure encounters Third Parties capable of influencing medical, regulatory, or business decisions, including government officials, Health Care Professionals (HCPs) and Health Care Organizations (HCOs).

This ABAC Policy prohibits bribery in any form, including bribery of government officials or private sector bribery. Bribery is the accepting, 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, or Third Party 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. Anything of value is defined broadly and includes gifts, entertainment, charitable contributions, job offers, and beneficial treatment. See the definition in Section 4.0. All Covered Persons are expected to comply with

- applicable ABAC 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.
- 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.
- all applicable AtriCure policies and procedures that are related to this policy.

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

## 2.0 Scope

2.1 This Policy applies globally to all Covered Persons, regarding 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. If there is a conflict between following local anti-corruption laws and this policy, contact the Ethics and Corporate Responsibility department for guidance before taking action.

	<b>Anti-Bribery Anti-Corruption Policy</b>	Document # <b>POL-740-503</b>	
		Rev <b>05</b>	Page <b>2</b>

### 3.0 References

References listed below are applicable to this Policy.

Reference	Title
POL-740-500	Code of Conduct
POL-740-511	Global Health Care Compliance Manual
POL-740-504	AtriCure Business Partner Conduct Standards

### 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	Has the meaning set forth in Section 1.0 above.
Local Codes of Ethics	The applicable codes of ethics in the local market, such as the APACMed Code of Ethical Conduct, MedTech Europe Code of Ethical Business Practice, and China AdvaMed Code.
Corruption	It is the misuse of entrusted power, in a professional context, for personal gain or for the benefit of a third party.
Educational Items	Benefit patients or provide a genuine educational function for HCPs such as textbooks or anatomical models.
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, health care professional working in a public or government-sponsored health care program, official or employee of a public international organization, employees of companies or organizations partially or wholly owned or controlled by a government.
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:

	<b>Anti-Bribery Anti-Corruption Policy</b>	Document # <b>POL-740-503</b>	
		Rev <b>05</b>	Page <b>3</b>

	<ul style="list-style-type: none"> <li>• Educational items;</li> <li>• Gifts, regardless of type or amount of value;</li> <li>• Hospitality, including travel, lodging, meals, expenses;</li> <li>• Entertainment, including sports tickets or other recreational activities;</li> <li>• Proprietary, confidential, or other non-public information;</li> <li>• Promises of current or future employment or business relationships;</li> <li>• Beneficial treatment;</li> <li>• Job offers;</li> <li>• Cash or cash equivalent payments of any kind;</li> <li>• Additional discounts or rebates;</li> <li>• Provision of service not provided for by the contractual relationship;</li> <li>• Payments or incentives for government actions;</li> <li>• In-kind contributions;</li> <li>• Grants or sponsorships;</li> <li>• Political contributions or lobbying expenditures;</li> <li>• Charitable or other donations;</li> <li>• Speaker fees or honoraria;</li> <li>• Reduction or forgiveness of any obligation (e.g., debt)</li> </ul>
Third Party	Third parties include business partners which are 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, temporary workers, 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.

## 5.0 Roles and Responsibilities

5.1 Covered Persons are responsible for understanding and complying with this Policy, including training and other ABAC compliance information provided by the AtriCure Ethics and Corporate Responsibility department.

Covered Persons are 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.

In the event a Covered Person suspects that a violation of this Policy has occurred or may occur, they must immediately notify AtriCure Ethics and Corporate Responsibility department at [compliance@atricure.com](mailto:compliance@atricure.com) or the AtriCure [Ethics Hotline](#).

Retaliation has no place at AtriCure. The Company will protect those who speak up and will not tolerate retaliation against anyone who asks a question, raises concern, or participates in an

	<b>Anti-Bribery Anti-Corruption Policy</b>	Document # <b>POL-740-503</b>	
		Rev <b>05</b>	Page <b>4</b>

investigation in good faith—meaning that you are giving all the information you have, and you believe your report is correct. AtriCure encourages all of us to speak up if we have concerns about potential retaliation in any form.

## 6.0 Requirements

### 6.1 Offering and Accepting Educational Items, Gifts & Hospitality

Covered Persons must not offer, give, or receive educational items, gifts and/or hospitality in exchange for any improper advantage. Educational items may be given to HCPs if they serve a genuine educational purpose, are related to the HCPs 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 and accept hospitality only 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. Hospitality must be reasonable, subordinate in time and suitable for the legitimate business purpose.

Gifts must be modest, reasonable, and not intended to influence business decisions.

### 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, whether directly or through a Third Party, shall violate this Policy, without regard to whether the intended recipient accepted the improper payment or actually provided an improper advantage.

Facilitation payments which are small, unofficial payments made to expedite routine government actions such as obtaining permits or licenses, are prohibited.

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

All expenses must be accurately accounted for, include appropriate supporting documentation, and entered in company records prior to reimbursement. Documentation must include, the accurate identification of all payments to third parties acting for or on behalf of AtriCure.

	<b>Anti-Bribery Anti-Corruption Policy</b>	Document # <b>POL-740-503</b>	
		Rev <b>05</b>	Page <b>5</b>

Payments to HCPs for services such as consulting, speaking, and education must be legitimate, documented, and at fair market value.

Transparency requirements under the U.S. Sunshine Act or similar laws of other countries must be complied with.

#### 6.4 Political & Charitable Contributions

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

Charitable contributions must be legitimate, properly documented, and free from conflicts of interest.

#### 6.5 Conflicts of Interest

Covered Persons must disclose any personal, financial, or professional relationships that could improperly influence business decisions.

#### 6.6 Conducting Proper Due Diligence and Liability for the Acts of Third Parties

AtriCure uses distributors or other Third Parties to sell and distribute its products, Under the FCPA, the U.K. Bribery Act and many other countries’ anti-bribery laws, AtriCure 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 from participating in bribery or corruptive conduct.

To mitigate these 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 all due diligence requirements in addition to complying with the legal requirement of having a valid and approved contract before services are rendered. AtriCure has standard contract language which requires Third Parties to comply with all laws and AtriCure’s standards. No contract will be approved without this language or variations approved by the Legal and/or Ethics and Corporate Responsibility departments. No contract should be effective until the due diligence is completed satisfactorily and approved by Legal and/or Ethics and Corporate Responsibility departments.

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

	<b>Anti-Bribery Anti-Corruption Policy</b>	Document #	<b>POL-740-503</b>
		Rev	<b>05</b>

### 6.7 Monitoring

The Ethics and Corporate Responsibility department is responsible for periodic monitoring and auditing compliance with this Policy. These activities include, but are not limited to, identifying criteria by which distributors are identified for audit and conducting distributor audits accordingly.

### 6.8 Reporting and Non-Retaliation

Covered Persons must report any activities they believe to be a violation of this Policy to the AtriCure Ethics and Corporate Responsibility department at [compliance@atricure.com](mailto:compliance@atricure.com). Reports may also be made anonymously through [atricure.ethicspoint.com](http://atricure.ethicspoint.com) or by calling the hotline at 1-855-541-4171. Information in multiple languages and international calling numbers can be found at [atricure.ethicspoint.com](http://atricure.ethicspoint.com).

AtriCure prohibits retaliation and will protect those who speak up. AtriCure will not tolerate retaliation against anyone who asks a question, raises a concern, or participates in an investigation in good faith. AtriCure encourages all of us to speak up if we have concerns about potential retaliation in any form.

### 6.9 Communication and Training

The Ethics and Corporate Responsibility Department provides anti-bribery anti-corruption training to applicable personnel annually.

### 6.10 Compliance

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

Effective Date: March 6, 2025