

# ARTIVION™

## ARTIVION, INC. CODE OF CONDUCT

### **Letter from Pat Mackin, Chairman, President, and Chief Executive Officer**

Dear Colleagues,

Every day our products and services touch the lives of people around the world – what I view as not only a great privilege but also a great responsibility. Our global reach is a testament to the high quality that our customers have come to expect and our commitment to patients, innovation, and safety compels us to conduct our business with dedication, honesty, integrity, and service.

Our Code of Conduct details the ethical standards and the framework under which we manage our business. Our responsibility to ensure corporate compliance means more than just following laws, policies, and procedures. In simple terms, corporate compliance means knowing what to do and doing what is right. We must strive to embed the values reflected in this Code of Conduct in our culture. When we hold these values as a cultural standard, they will guide us when we are faced with the complicated issues of our times. A culture of integrity begins with our leaders, who must serve as models for employees, demonstrating honesty and inspiring accountability. Compliance is essential for the wellness of all of our key stakeholders.

I expect you to familiarize yourself with this Code of Conduct and the related policies and use them as your daily guide. My expectation is for each employee to practice the principles outlined here, to ask questions if unsure about what to do, to promptly report any concerns, and to promptly report without concern for retaliation.

I hope you will have the same pride as I do in working at Artivion and I want to thank you for doing your part to carry on our values and fulfill the obligations of our Code of Conduct. Your commitment allows us to be successful year after year and continue to grow. Thank you for your work and commitment.

Sincerely,

Pat Mackin

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## Ethics

### Ethical Decision Making

The Artivion, Inc. (“Artivion” or the “Company”) Code of Conduct (the “Code”) is a summary of the principles and standards of business conduct expected of all employees wherever you operate, providing you with practical guidance on how to deal with important ethical issues to ensure integrity in our daily business activities. The Code also contains links to policies on specific topics that you must follow as well.

All of our officers, directors, employees, contractors, and consultants (“Covered Persons”) must conduct themselves accordingly and seek to avoid the appearance of improper behavior. The Code may also be provided to and required to be followed by, the Company’s other agents and representatives.

If the Code conflicts with applicable laws, rules, or regulations, you must comply with such laws, rules, or regulations. It is important that you know both the local rules and the Code. Where local laws or local industry codes are stricter than this Code, you must comply with the stricter regulation, absent approval from the Chief Compliance Officer. If you are concerned about such conflicts, you should ask Artivion’s Chief Compliance Officer how to handle the situation before proceeding.

This Code sets the standard that every Covered Person is expected to meet, regardless of location or position. It is also intended to provide general guidance on situations that may arise in your day-to-day activities on behalf of Artivion. The Code provides links to various Artivion policies, which are incorporated into this Code.

While our Code covers many areas of potential ethical or legal misconduct, it cannot, and does not attempt to, address every situation that may occur. You must therefore familiarize yourself with and follow the policies, procedures, and laws that apply to your particular job. If you ever have questions about this Code, please contact the Chief Compliance Officer.

If you do not comply with the provisions of this Code or other Artivion policies and procedures, you could be disciplined or terminated. You could also face criminal penalties and civil liabilities for violating the laws upon which the standards outlined in this Code are based.

All Covered Persons must report suspected violations of this Code, an Artivion policy, or any legal requirement. You may do so by notifying your manager, Human Resources, or the Chief Compliance Officer. You can also submit your concerns anonymously to [compliance@artivion.com](mailto:compliance@artivion.com) or the Compliance Hotline (855.845.3467 and <https://artivion.ethicspoint.com>). Artivion will investigate reported concerns impartially and will not permit any retaliation against you for reporting suspected violations in good faith.

We expect Covered Persons to follow this Code in letter and in spirit. If you have questions concerning the proper course of action, please consult your immediate supervisor, Human Resources, or the Chief Compliance Officer for direction.

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## EVERYONE MUST:

- Act always with integrity, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Read, understand, and comply with this Code, as well as have a general awareness of relevant laws, regulations, and all other Company policies and guidelines. Artivion will provide training, guidance, and access to those laws, regulations, and policies that are applicable to your particular job.
- Participate in required training and educational programs/events.
- Obtain guidance for resolving a business practice or compliance concern if you are uncertain about how to proceed in a particular situation.
- Recognize and report possible violations of this Code, an Artivion policy, or applicable laws and regulatory requirements.
- Cooperate fully in any investigation.
- Provide full, fair, accurate, timely, and understandable disclosure in Company reports and documents submitted to the Securities and Exchange Commission.

You should also be familiar with any ethics requirements specifically identified in your employee agreement. While this applies to all employees, such provisions are most often found in agreements for employees located in the Asia Pacific (“APAC”) region.

*WE EXPECT OUR LEADERS TO LEAD BY EXAMPLE AND REINFORCE THE PRINCIPLES OF OUR CODE THROUGHOUT ALL LEVELS OF OUR WORKFORCE.*

The Chief Executive Officer (“CEO”) and the Chief Financial Officer, Chief Accounting Officer, Treasurer, Controller, Assistant Controller, and other senior financial officers performing similar functions who have been identified by the CEO (collectively, the “Senior Financial Officers”) face additional responsibilities and are required to abide by the Code of Ethics for Senior Financial Officers, which imposes strict obligations on them to take careful steps to assure that the Company properly tracks and reports our financial performance.

## Compliance

### Speaking Up and Reporting Concerns

You are obligated to report situations that may involve violations of this Code, policies and procedures, or applicable laws, and failure to do so is itself a breach of this Code.

### Channels Available for Seeking Guidance in Reporting

#### YOUR IMMEDIATE SUPERVISOR

Your supervisors are excellent resources for guidance on concerns related to job-specific duties, coworker conflict, discipline disputes, promotion or transfer opportunities, and work environment issues.

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## CHIEF COMPLIANCE OFFICER OR HUMAN RESOURCES DEPARTMENT

These individuals have expert knowledge of standards of conduct as they relate to business, finance, law, and ethics. The Chief Compliance Officer can be reached at [compliance@artivion.com](mailto:compliance@artivion.com).

## ETHICS AND COMPLIANCE HOTLINE

Report by telephone: 855.845.3467

Report online: <https://artivion.ethicspoint.com>

The confidential third-party hotline is available 24 hours a day, 7 days a week for reports of compliance violations. Your phone call or online submission will be anonymous if requested, and a reference number will be issued. Providing the reference number allows you to check on the status of the report. Outside the U.S., the hotline may be restricted to receiving only specific types of reports, as there may be different legal requirements.

## Discipline and Zero Tolerance for Retaliation

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It is the responsibility of every Covered Person who becomes aware of or has reason to suspect activity that is illegal or potentially illegal to report such activity to the Company, including but not limited to, any materials related to the Company's financial statements or compliance with SEC laws or regulations and accounting or auditing matters. Failure to make such a report is a violation of the Code, and Covered Persons may be subject to disciplinary action up to and including termination or disaffiliation with the Company and/or possible civil or criminal liability or prosecution for failing to timely report such matters.

Artivion will not tolerate any form of retaliation against you for any report you make in good faith under this Code. Reporting in good faith means that you believe there may be a suspected violation of the Code or law and you fully share with the Company information you believe to be true about the situation. Any person who, on behalf of the Company, commits or condones any form of retaliation against a good faith reporter, will be subject to disciplinary action up to, and including termination, consistent with local law.

## Conduct

### Our Commitment to our Fellow Employees

*OUR GREATEST STRENGTH IS OUR EMPLOYEES. WE TREAT ALL OF OUR COLLEAGUES FAIRLY, HONESTLY, AND WITH RESPECT, AND WE MUST ENCOURAGE EACH OTHER AS WE WORK TOWARD COMMON GOALS AND MAINTAIN AN ETHICAL WORK ENVIRONMENT.*

### We Respect and Promote the Diversity of our Workforce

We do not make employment-related decisions based on a person's race, color, religion, sex, sexual orientation, gender identity, national origin, disability, protected veteran status, or any other basis protected by law.

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## **We Behave Professionally**

What we do and how we are perceived reflects the professional image of the Company. Behaving and dressing in a professional manner is just one of the ways we demonstrate respect for those we work with and serve. Carefully consider safety and cultural expectations and norms for professional dress.

## **We Have Zero Tolerance for Harassment**

Harassment, whether sexual or non-sexual in nature, of or by any employee, contractor, supplier, or customer, while on Company property, or at Company-sponsored events will not be tolerated in any form. While standards and definitions of harassment may vary from country to country, harassment comes in many forms and constitutes any unwelcome behavior that has the purpose or effect of creating an intimidating, offensive, or hostile work environment. If you experience or suspect harassment, report the situation immediately to your supervisor or any member of management, Human Resources, or the Chief Compliance Officer.

## **Our Commitment to our Fellow Employees**

We have many standards and expectations in our Employee Handbook (the “Handbook”). Employees are expected to be familiar with and follow the Handbook. The Handbook can be found on our internal employee resource system UltiPro or by contacting Human Resources. Topics in the Handbook include, but are not limited to: (1) Workplace Health and Safety; (2) Alcohol and Drugs; (3) Injury and Illness; (4) Workplace Violence; (5) Gifts; (6) Use of Company Computers and Networks; (7) Use of Social Media; (8) Travel and Expense; and (9) Engaging in Government and Political Activities.

*IMPORTANTLY, ARTIVION IS NOT PERMITTED TO MAKE POLITICAL CONTRIBUTIONS IN GREAT BRITAIN, FRANCE, BELGIUM, BRAZIL, OR ITALY AS A COMPANY OR EVEN EXECUTIVES.*

## **Our Commitment to our Customers and Suppliers**

### **Purchasing Practices**

The selection of suppliers will be made on the basis of the total value they will provide to the Company. This includes suppliers complying with applicable laws and regulations related to labor, health and safety, and the environment. Suppliers who are also Company customers will receive no advantage in Company purchasing decisions. Purchases and sales should be viewed independently and analyzed solely on the basis of their impact on the Company’s business.

### **Product Quality**

Our customers choose Artivion because we provide consistently superior products and services. Ensuring that our products and services are of the highest quality is critical to our success. We must each be aware of and follow our own quality policies and procedures and U.S. Food and Drug Administration (“FDA”) standards, as well as the standards of governmental or competent authorities in other countries, that protect the quality of our products and services. In addition, we expect our suppliers to assure the quality and safety of the materials and services they provide to Artivion.

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## **Advertising and Product Promotion**

All of our products and services must be distributed solely on the basis of legal factors, such as price, quality, and service. Our policy is that all promotional materials and communications pertaining to our Company and its products and services will be compliant with legal and regulatory standards.

Our advertising should always be truthful, and specific claims must be fair and substantiated. No Covered Person should engage in either deceptive advertising or questionable promotional activities.

- We strictly prohibit the promotion of Artivion products or services for use other than for those indications cleared or approved by the FDA or relevant government or competent authority for that country.
- We have a review process to ensure customer-facing communications are evaluated to minimize the risk of inappropriate advertising or promotions.

## **Data Protection**

Artivion complies with all applicable data protection laws. You should familiarize yourselves with our data protection policies, which can be found on our internal Employee resource system UltiPro or by contacting Human Resources. There, you will find our Data Protection Policy, Data Subject Request Policy, and Data Breach Policy. In addition, our Privacy Policy can be found at <https://artivion.com/privacy-policy>, and our Global Data Protection Officer can be reached at [privacy@artivion.com](mailto:privacy@artivion.com).

## **Intellectual Property and Confidential Information**

Confidential information is information that is not generally known or readily available to others but is of value to the Company or its competitors. Confidential information includes financial or technical data, plans for acquisitions or divestitures, new products, marketing strategies, major contracts, business plans, and significant corporate developments.

Artivion invests substantial resources in developing proprietary intellectual property and confidential information. Artivion protects its intellectual property by seeking patent or trademark protection, as well as maintaining the confidentiality of our trade secrets. Accordingly, we respect the intellectual property of others.

Covered Persons shall maintain the confidentiality of any non-public, business information learned in the performance of their duties, except when disclosure is authorized by the Company or legally mandated.

## **Anti-Kickback and Ethical Interactions with Health Care Professionals**

### **LEGAL AND ETHICAL INTERACTIONS WITH HEALTH CARE PROFESSIONALS (“HCPS”) AND HEALTHCARE ORGANIZATIONS (“HCOS”)**

Artivion is committed to maintaining legal and ethical interactions with HCPs and HCOs involved in the purchase, lease, recommendation, use, or arrangement for the purchase or lease of Company products. Collaboration between HCPs or HCOs and the Company is important for promoting the

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advancement of Company technologies, the safe and effective use of Company products, encouraging bona fide research and education, and fostering charitable giving.

However, as interactions with HCPs and HCOs are governed by laws, Company Covered Persons must ensure that all interactions with HCPs and HCOs are in full compliance with applicable law, as well as ethical business practices. In furtherance of this, the Company has adopted and incorporated into this Code the AdvaMed Code of Ethics on Interactions with Health Care Professionals (“AdvaMed Code”) and the MedTech Europe Code of Ethical Business Practices Guidelines on the interactions with Healthcare Professionals and Healthcare Organizations (“MedTech Europe Code”), and the APACMed Code of Ethical Conduct for Interactions with Health Care Professionals (“APACMed Code”), where applicable.

For any questions concerning interactions with HCPs and HCOs, contact the Company’s Chief Compliance Officer at [compliance@artivion.com](mailto:compliance@artivion.com). Maintaining compliance with applicable laws and ethical business practices helps to ensure that decisions made regarding our products are with the best interests of patients in mind.

Finally, Artivion complies with transparency laws as required in each jurisdiction in which it does business, including the Physician Payment Sunshine Act that is Part of the Patient Protection and Affordable Care Act of 2009 (H.R. 3590, section 6002). This Code incorporates compliance with such transparency laws by reference.

## **Securities Laws and Regulations and Insider Information**

Artivion is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, and audit practices. The Company takes insider information very seriously, and our Insider Trading Policy can be found at <https://investors.artivion.com/corporate-governance/cryolifes-code-conduct>.

## **Antitrust, Fair Pricing, and Fair Dealing**

Antitrust laws are designed to maintain a free, open, and competitive marketplace. Under these laws, competitors compete fairly and do not engage in activities or negotiations that would obstruct competition. No Covered Person of Artivion shall engage in anti-competitive conduct in violation of any antitrust or competition law.

We have made a commitment to deal lawfully with all our actual or potential customers, suppliers, and other business partners. We never misrepresent the quality, features, or availability of our products or services. Moreover, no Covered Person shall take unfair advantage of any customer, supplier, competitor, or other person through manipulation, concealment, misrepresentation of material facts, or other unfair-dealing practice.

Accordingly, it is Company practice that Covered Persons must not discuss pricing, bids, advertising, territories, customers, or other competitively sensitive information with competitors or attend/participate in any meeting where such matters are discussed.

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Covered Persons should avoid the following prohibited conduct without approval from Artivion's General Counsel:

- Any collaborative action with a competitor.
- Agreements or understandings with competitors, either directly or through others, to fix prices, divide customers or allocate territories, or restrict sales.
- Exchange of pricing or other proprietary information with competitors.
- Tying, price discrimination, or refusal to deal.
- Any action that could have an anti-competitive effect.

## **Our Commitment to the Public**

### **Anti-Corruption**

The Company strives to maintain the highest ethical and legal standards. We understand and comply with the public sector contracting and procurement laws, such as the Foreign Corrupt Practices Act ("FCPA") and other international laws where the Company conducts business. This includes any payments to health care professionals, who in many foreign countries are considered public officials as a result of their employment or reimbursement by a publicly funded health system or insurance company. Artivion's FCPA policy can be found here: <https://investors.artivion.com/corporate-governance/foreign-corrupt-practices-act>.

### **Environmental, Social, Governance ("ESG")**

Artivion is committed to being a good corporate citizen, a component of which is maintaining high ESG standards. Our annual ESG Corporate Responsibility Report can be found at <https://investors.artivion.com/corporate-responsibility-report-esg>.

### **Human Rights Responsibility and UK Modern Slavery Act Statement**

Artivion is committed to acting with the highest integrity in business dealings and serving as a corporate role model of responsible corporate citizenship. Artivion's Human Rights Responsibility and UK Modern Slavery Act Statement can be found here: <https://investors.artivion.com/human-rights-responsibility-and-uk-modern-slavery-act-statement-fy-2022>.

## **Administration of the Code**

### **Certification**

All Covered Persons are required to certify that they have read, understand, and are in compliance with and will continue to comply with this Code. Employees are required to certify that they have read, understand, and are in compliance with the Code annually. Under no circumstances does your failure to read the Code, sign and acknowledge, or certify online exempt you from your obligation to comply with this Code.

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## **Request for Waivers/Special Considerations**

While some standards in the Code require strict application (and exceptions and waivers are not allowed), others do allow for greater leniency in application. For example, minor conflicts of interest may be resolved by disclosing the conflict to all interested parties or certain gifts that facilitate business objectives may be permissible.

Any waiver of the Code for directors and officers may only be made by the Board of Directors. All requests for waivers or special consideration should be submitted to the Chief Compliance Officer.

August 2023