

# **ENOVIS Complaint Handling Policy**

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#### 1. Purpose

The purpose of this Complaint Handling Policy (this "Policy") is to document the procedures of Enovis Corporation and its subsidiaries ("Enovis" or the "Company"), with respect to the receipt, treatment, and retention of complaints received by the Company regarding potential or actual workplace issues or illegal or unethical conduct by the Company or an employee, independent contractor, vendor, or third-party representative of the Company ("Complaints").<sup>1</sup>

This Policy, which has been approved by Enovis' Audit Committee of its Board of Directors, is intended to comply with the Company's legal obligations with respect to complaint handling procedures, including any requirements under the Sarbanes-Oxley Act of 2002 ("SOX"), the rules of the Securities and Exchange Commission promulgated pursuant thereto, and any applicable rules or regulations of NASDAQ. Furthermore, this Policy is intended to establish appropriate complaint handling procedures so that the Company may receive any benefit that may be available to the Company under the United States Federal Sentencing Guidelines and other applicable laws, regulations, standards, rules, and guidelines.

In addition, this Policy supports Enovis' principles of business conduct described in the Enovis Code of Business Conduct (the "Code") and serves to facilitate disclosures, encourage proper individual conduct, and alert the Company's senior management, the Board, and its Audit Committee to potential problems before they result in serious consequences.

### 2. Governance Structure

The Company General Counsel ("GC"), Chief Compliance Officer ("CCO") and their designee(s) are responsible for developing, coordinating, supervising, and monitoring the Company's procedures for the receipt and handling of Complaints.

### **3.** Receipt of Complaints

To fulfill its legal obligations and support a broader culture of open communication, the Company created the Enovis Corporation Ethics hotline (the "Ethics Hotline"), which is a global network of contacts and channels that are available for raising concerns. Through this hotline, the Company fulfills its obligation to establish a procedure for the confidential, anonymous submission of Complaints. Concerns can be raised by calling the dedicated hotline numbers or through the Enovis Corporation Ethics website (the "Web Portal"), each of which are identified in the Enovis Code of Business Conduct.<sup>2</sup> Employees may also raise concerns to any member of the Enovis Legal Department, the Chief Compliance Officer, or any Human Resource Manager.

Any person — including non-employees — may submit a report via the hotline; and the Company has made the contact information for the Ethics Hotline and Web Portal publicly-

<sup>&</sup>lt;sup>1</sup> This Policy is not intended to address the Company's processes for handling concerns about illegal or unethical conduct that may be brought to its attention as a result of litigation, a government investigation, or similar legal action brought against the Company. Although various Enovis departments may assist in responding to such legal actions, the Company's response to any such concerns are overseen by the Company General Counsel and Head of Litigation and Investigations.

<sup>&</sup>lt;sup>2</sup> The General Counsel, Chief Compliance Officer, and their designee(s) are responsible for administering the hotline and has selected a vendor to provide this service.

available in the Code and on the Enovis Corporation website. Where permitted by applicable laws,<sup>3</sup> a person (including a non-employee) may submit a Complaint anonymously.

Company management is responsible for communicating information to employees about the availability to speak up, including the hotline, without fear of retaliation. As set forth in the Code and this Policy, retaliation is prohibited against any employee who in good faith raises a concern – even if a reported concern is eventually unsubstantiated.

#### 4. Complaint Categories and Logging

#### a. Complaint Tiers

The following categories of Complaint types are used to direct the handling of a Complaint regardless of the channel through which it is received:

1. Tier 1: Tier 1 Complaints have enterprise-wide implications and potential consequences to the Company, such as alleged material or significant (1) violations of law, (2) violations of accounting or auditing policies, (3) material healthcare compliance concerns or billing and reimbursement matters that concern potential violations of law, or (4) concerns of suspected illegal conduct or violations of the Code of Conduct by a member of the Company's executive leadership team, including but not limited to the Chief Executive Officer (CEO), Chief Financial Officer ("CFO"), GC<sup>4</sup>, CCO, any member of the CEO's staff and/or the President of a Business Unit

*Tier 1 Complaints must be escalated to the Enovis Legal Department and/or their designee(s), and the Envois Legal Department will lead the investigation.* 

2. Tier 2: Tier 2 Complaints have implications and potential consequences at the Business Unit level, such as any alleged violation of the Code of Conduct or company policies relating to (1) environmental, health and safety; (2) a human resource matter, such as discrimination, harassment, or hostile work environment that is based upon an actual or perceived or associational protected characteristic (e.g., race, gender, age, religion, disability, national origin, or any other category protected by law); (3) healthcare compliance concerns or billing and reimbursement matters (e.g., Federal and State Anti-Kickback matters, Federal and State False Claim matters, Open Payments reporting); or (4) a member of the senior management team of a business platform that is not a Tier 1 violation.

Tier 2 Complaints must be escalated to the Enovis Legal Department and/or its designee(s), and responsibility for leading the investigation will be determined by the Enovis Legal Department and/or Chief Compliance Officer. This may include

<sup>&</sup>lt;sup>3</sup> Availability outside the United States depends, in part, on data privacy regulations and local laws. To the extent the Company cannot accept a Complaint in a particular jurisdiction via the hotline or web, the reporter will be referred to another channel.

<sup>&</sup>lt;sup>4</sup> In the event of a Tier 1 Compliant against the GC, the CHRO has express authority to escalate the Compliant to the Audit Committee Chair to determine how the Complaint will be investigated.

investigation by the appropriate business unit's Human Resources Department or Legal Department lead.

3. Tier 3: Tier 3 Complaints include an allegation or concern that relates to an employee's day-to-day workplace experience. Examples include a local environmental, safety, or human resource issue at the local level (e.g., work distribution, personality clashes with a coworker or manager, scheduling conflicts, or favoritism.) Tier 3 Complaints have impact at a local level only, do not involve a material or significant violation of law or policy, do not involve a member of senior management at the corporation or business platform level, and have little to no financial, operational, or reputational impact to the Company.

*Tier 3 Complaints should be handled by the appropriate Human Resources representative in coordination with the appropriate leaders.* 

At any time, the Enovis Legal Department may elect to direct or lead the routing and investigation of any Tier 3 Complaint (excluding complaints which may implicate themselves).

b. Logging Complaints

All matters that are reported through the Ethics Hotline or any other Complaints received, regardless of the channel through which they are received, will be logged into the system with an incident number, and a summary of each report will be maintained throughout the active investigation of the Complaint. On a monthly basis, the employee responsible for receiving the complaints or incidents and logging them into the system will provide a summary of each incident to the General Counsel and Chief Compliance Officer of the Company. The employees responsible for logging the complaints, in collaboration with the General Counsel and the Chief Compliance Officer, will be responsible for designating the level of risk as Tier 1, 2 or 3, and those designations will determine the manner in which the Complaint is investigated and reviewed.

# 5. Investigation of Complaints

a. Internal Investigation Policy

Enovis maintains an Internal Investigation Policy, which must apply (at a minimum) to any investigations of Tier 1 and Tier 2 Complaints.

#### b. Anti-Retaliation Policy

Enovis maintains an Anti-Retaliation Policy in its Code.

Consistent with the requirements of SOX, the Dodd-Frank Wall Street Reform and Consumer Protection Act, and other applicable laws and guidelines, the Company strictly prohibits retaliation against any employee, officer, or director who in good faith raises a concern or participates in good faith in the handling or investigation of a concern regarding an actual or suspected violation of the Code or policies, or applicable laws, regulations, or contracts (even if the concern is eventually unsubstantiated). No employee, officer, or director should be discharged, demoted, suspended, threatened, harassed, intimidated, coerced, or retaliated against in any other manner as a result of his or her raising in good faith or assisting in good faith in the handling or investigation of a Complaint.

# 6. Oversight of the Board of Directors

Enovis' Board of Directors, through its Audit Committee, exercises its oversight obligations with respect to Complaint handling. The Company's General Counsel identifies Complaints that meet the following escalation criteria and provides the Audit Committee with periodic updates (and immediate updates as necessary) on those Complaints.

### a. Escalation of Complaints to the Board by the General Counsel

The General Counsel will report promptly (or immediately in the case of matters that have enterprise-wide implications) to the Audit Committee (or full Board) if s/he becomes aware, through a Complaint or otherwise, of any credible allegation or evidence of:

- 1. Complaints or concerns relating to accounting, internal accounting controls or auditing matters with potential financial reporting implications:
- 2. Material misconduct (including criminality, illegality, fraud, harassment, or material violation of Company policy) by:
  - a. A member of the executive leadership team (CEO, CFO, GC, CCO, any other member of the CEO's staff and/or the President of a Business Platform);
    - i. (if involving the GC, the CCO has express authority to report directly to the CEO and Audit Committee Chair)
  - b. An employee(s) who provides certifications related to the Company's financial reporting or otherwise has a significant role in the Company's financial controls or internal controls over financial reporting;
- 3. Retaliation claims alleging violations of whistleblower or anti-retaliation provisions of the Dodd-Frank Financial Reform Act or Sarbanes-Oxley Act;
- 4. High-risk legal and compliance matters likely to result in significant or sustained financial, operational, or reputational damage, or erosion of the actual or perceived value of the company and its brand. This includes:
  - a. Conduct that could potentially result in significant civil or criminal penalties for the Company (e.g., violations of the Federal Food, Drug, and Cosmetic Act (FDCA); Federal and State Anti-kickback Statues (AKS); Federal and State False Claims Acts (FCA); Foreign Corrupt Practices Act (FCPA) or other bribery statues); financial crimes such as money laundering, insider trading, stock tipping, securities fraud, or falsifying financial statements; and laws and regulations relating to trade controls, antitrust, cybersecurity, data privacy, environmental, health and safety;
  - b. Material financial exposure or operational loss to the Company;
  - c. A legal or compliance matter that is likely to generate material negative media coverage or otherwise materially damage the reputation of the Company; or
  - d. Any Tier 1 Compliant not otherwise addressed above.

The General Counsel and Chief Compliance Officer, collectively or individually, may also escalate Complaints or other matters to the Board which do not meet these criteria at their discretion.

In addition, the General Counsel and Chief Compliance Officer, collectively or individually, have the express authority to communicate directly at any time with Audit Committee on any Company matter involving criminal conduct or potential criminal misconduct.

b. Ethics Hotline Program Updates and Metrics.

On a periodic basis, and at least annually, the General Counsel reports to the Audit Committee on key metrics regarding Enovis' compliant handling to assist the Company in assessing compliance program effectiveness and the appropriate functioning of complaint handling processes.

Similarly, quarterly reports summarizing all Tier 1 and Tier 2 complaints are provided to the Audit Committee. The Audit Committee may also at any time ask for any information relating to the receipt, treatment, and retention of Complaints under this Policy.

c. Direct Receipt of a Complaint by the Board

In the event the Board, any particular director, any committee of the Board (including the Audit Committee), or any other group of directors receives a Complaint directly, the member will either promptly (a) refer the Complaint to the General Counsel and/or Chief Compliance Officer, who will evaluate it in the same manner as a similar Complaint received in compliance with this Policy and (b) notify the Chair of the Audit Committee.

d. Board Authority to Conduct Investigations and Engage Outside Advisors

Regardless of whether a Complaint is received directly by the Board or via an escalation described in this Policy, the Board has the authority to conduct an investigation of a Complaint independent of Company management. The Board also has the right to engage outside advisors, including counsel, as it determines necessary. Company management will assist the Board upon request.

# 7. Retention of Complaints

The Company will maintain records relating to Complaints, as well as records relating to any investigations and their outcomes, consistent with the Company's policies for records retention and the requirements of applicable law.

### 8. Periodic Audits

The Company's Internal Audit department will periodically audit the Company's complaint handling processes, including the functionality of the Ethics Hotline.