



ANTI-CORRUPTION, BUSINESS ETHICS & GIFTS, ENTERTAINMENT & COMMISSIONS POLICY

Ember Ion, LLC

Effective Date: February 18, 2026 | Policy Owner: Ember Ion, LLC | Version: 1.0

1. Purpose and Scope

This policy states Ember Ion, LLC ("Ember Ion," "we," or "the Company") standards for business ethics, anti-corruption compliance, and the giving or receiving of gifts, entertainment, commissions, and other business courtesies. It applies to all Ember Ion directors, officers, employees, and contractors, and to any third party — including sales agents, resellers, consultants, or other intermediaries — acting on Ember Ion's behalf (collectively, "Personnel").

Because Ember Ion sells the Reignition platform to hospitals and health systems, many of which are public, municipal, university-affiliated, or otherwise government-connected entities, this policy addresses both (a) general anti-corruption law applicable to interactions with any government official, and (b) U.S. healthcare fraud and abuse law applicable to interactions with hospital staff and clinicians regardless of whether the hospital is public or private.

2. Anti-Corruption Compliance

2.1 General Prohibition.

No Personnel may offer, promise, authorize, or give anything of value — directly or through a third party — to any Government Official, hospital employee, or other person for the purpose of improperly influencing a decision, obtaining or retaining business, or securing any improper advantage for Ember Ion. This prohibition applies regardless of local custom, and regardless of whether the item of value is offered by Ember Ion or by a third-party intermediary acting on its behalf.

2.2 Definition of Government Official.

For purposes of this policy, "Government Official" is interpreted broadly and includes: any officer or employee of a government or government-owned or government-affiliated entity (including public, county, municipal, university, or military hospitals and health systems, and the U.S. Department of Veterans Affairs); any officer or employee of a public international organization; any political party official or candidate for public office; and any person acting in an official capacity on behalf of any of the foregoing.

2.3 Facilitation Payments.

Ember Ion does not permit facilitation or "grease" payments of any kind, including small payments to expedite routine government action.

2.4 Third-Party Intermediaries.

Before engaging any sales agent, reseller, consultant, or other third party who will interact with hospital or government personnel on Ember Ion's behalf, Personnel must complete anti-corruption due diligence

appropriate to the risk presented, and any compensation to such intermediaries must be reasonable, commensurate with legitimate services actually performed, and must never be structured as a success fee contingent on obtaining a specific government or public-hospital contract in a manner that could be construed as a payment for improper influence.

3. Gifts, Entertainment, and Business Courtesies

3.1 General Standard.

Modest gifts and business entertainment that are customary, infrequent, and directly related to a legitimate business purpose are permitted, provided they comply with the monetary limits and approval requirements below and with the recipient's own organization's policies. Gifts and entertainment must never be offered in exchange for, or with the intent to influence, a purchasing decision, referral, or any other official action.

3.2 Monetary Limits.

Individual gifts to any single recipient may not exceed \$50 in value, and aggregate gifts to any single recipient may not exceed \$150 in any calendar year without advance written approval. Business meals and entertainment must be reasonable in value, infrequent, and, whenever practical, include attendance by Ember Ion Personnel (no entertainment provided in Ember Ion's absence).

3.3 Absolute Prohibitions.

- Cash or cash equivalents (including gift cards) in any amount, to any recipient;
- Any gift or entertainment offered to a hospital employee who has, or whose role gives them, influence over a Reignition purchasing, renewal, or referral decision, where the gift is tied — explicitly or implicitly — to that decision;
- Gifts or entertainment offered during an active procurement or contract negotiation with that recipient's institution beyond ordinary, modest business meals;
- Any gift, payment, or entertainment prohibited by the recipient's own organization's conflict-of-interest or vendor-relations policy; and
- Travel, lodging, or entertainment for a Government Official's family members or guests.

3.4 Approval and Recordkeeping.

Any gift or entertainment expense above \$50 must be pre-approved by director level or above and logged with the recipient's name, organization, item, value, and business purpose. Records must be retained for seven (7) years consistent with Section 6.

4. Healthcare-Specific Compliance: Anti-Kickback Statute and Stark Law

Because Reignition is marketed and sold to hospitals, health systems, and the clinicians who work within them, Ember Ion Personnel must also comply with the federal Anti-Kickback Statute (42 U.S.C. § 1320a-7b) and, where applicable, the Physician Self-Referral Law ("Stark Law," 42 U.S.C. § 1395nn), which apply independently of — and in addition to — general anti-corruption law and are not limited to interactions with government-affiliated hospitals.

- No payment, gift, discount, or other item of value may be offered to a hospital, health system, physician, nurse, or other clinician in exchange for, or in any manner tied to, a decision to purchase, recommend, or continue using Reignition.
- Any discount, free trial period, or founding-partner pricing arrangement must be offered on the same terms to similarly situated prospective customers and documented as a bona fide commercial term, not an inducement tied to referrals or purchasing decisions by any individual clinician or administrator.
- Any compensation paid to a hospital-affiliated individual for legitimate services (for example, a clinical advisory board member) must reflect fair market value for services actually rendered, be documented in a written agreement, and must not vary based on the volume or value of business that individual's institution does with Ember Ion.

5. Reporting Violations and Non-Retaliation

Any Personnel who becomes aware of a suspected violation of this policy must report it promptly to Jen Phillips, Chief Compliance Officer. Ember Ion prohibits retaliation against anyone who reports a suspected violation in good faith, even if the report is later found to be unsubstantiated.

6. Recordkeeping

Ember Ion will maintain accurate books, records, and accounts that fairly and accurately reflect all transactions and disposition of assets, consistent with the recordkeeping provisions of the Foreign Corrupt Practices Act and applicable law. No undisclosed or unrecorded fund or asset may be established for any purpose.

7. Training and Certification

Personnel whose roles involve interaction with hospital customers, government-affiliated entities, or third-party intermediaries must complete anti-corruption and healthcare compliance training upon hire and at least annually, and must certify compliance with this policy on the same cadence.

8. Enforcement

Violation of this policy may result in disciplinary action up to and including termination, and may expose the individual and Ember Ion to civil or criminal liability. Ember Ion reserves the right to report violations to appropriate authorities where required or advisable.

9. Policy Administration

This policy is owned by Ember Ion, LLC and will be reviewed at least annually and updated as Ember Ion's customer base, geographic footprint, or applicable law changes. Questions about this policy may be directed to Jen Phillips at jen@emberiontechnologies.com

ACKNOWLEDGMENT

I acknowledge that I have read and understood this Anti-Corruption, Business Ethics & Gifts, Entertainment & Commissions Policy and agree to comply with its terms.

Name: _____

Title: _____

Signature: _____

Date: _____