



Foreign Corrupt Practices Act **Anti-Corruption Policy**

1. Introduction

This policy explains the specific requirements and prohibitions applicable to our worldwide operations under the anti-corruption provisions of the US Foreign Corrupt Practices Act ("FCPA"). As a company, we are committed to conducting ourselves according to the highest standards of ethical conduct. LeMaitre strictly prohibits all forms of bribery and corruption and will take all necessary steps to ensure that it does not occur in its business activities. This policy is applicable to all of LeMaitre's operations and subsidiaries worldwide and to all of our executives, directors, officers and employees (collectively referred to in this policy as "Employees").

The penalties for violating the FCPA are severe. In addition to being subject to internal discipline (including termination of employment), individuals who violate the FCPA may also be subject to imprisonment, fines and other penalties.

2. FCPA Elements

Under the FCPA, it is illegal for US companies and their subsidiaries, as well as their officers, directors, employees and agents, to bribe foreign (i.e., non-US) officials to secure business.

Who Are Foreign Officials?

The term "foreign official" is widely defined and includes:

- a) Officers or employees of a foreign government or any department, agency or instrumentality thereof or individuals who hold any legislative, administrative or judicial position, whether appointed or elected, or who exercise a public function for or on behalf of a foreign country or territory;
- b) Officers or employees of a company or business owned in whole or in part by a government;
- c) Officers, employees, officials or agents of a public international organization (such as the United Nations or the European Union);
- d) Foreign political parties or officials;
- e) Candidates for political office; and
- f) Spouses or other family members of anyone listed above.

In our business, doctors, nurses, administrators and other employees acting on behalf of a state-owned or state-controlled hospital or clinic must be assumed to be foreign officials.

What Are Bribes?

In general, the FCPA prohibits offering to pay, paying, promising to pay, or authorizing the payment of money or anything of value to a foreign official in order to influence any act or decision of the foreign official in their official capacity or to secure any other improper advantage in order to obtain or retain business.

This prohibition also applies to payments to third-parties knowing, believing or suspecting that the third-party will use any part of the payment to pay bribes.

Payments that violate the FCPA may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. They can include, for example, the following:

- a) Gifts and gift cards;
- b) Hospitality, including travel, meals, lodging and entertainment;
- c) Loans and non-arm's length transactions;
- d) Internships or employment opportunities;
- e) Political donations; and
- f) Charitable donations.

3. Product Education

LeMaitre may pay for the cost of meals, lodging or travel if, and only if, the expenses are bona fide, reasonable, proportionate and directly related to the promotion, demonstration or explanation of our products or services. Particular care must be taken when paying any such costs associated with a foreign public official to ensure it is clear that such payments are not intended, and cannot be perceived as being intended, to influence the foreign public official in the exercise of his or her public functions. This means the educational purpose should be paramount to any other possible intention.

These interactions must also comply with the applicable LeMaitre Sales & Marketing Code of Conduct.

4. Cash Payments

Cash payments of any kind are prohibited.

5. Record Keeping

All payments and expenses made on behalf of LeMaitre must be recorded accurately and in reasonable detail, providing the purpose and amount of the expenditure.

6. Compliance

Employees must complete LeMaitre's periodic anti-corruption training and be familiar with and perform their duties in accordance with this policy. Employees who violate this policy are subject to disciplinary action, up to and including dismissal.

Employees must also inform our business partners, distributors and any other third-party representatives that provide services to LeMaitre that they need to comply with the FCPA and this policy. Our distributors are required annually to certify they are in compliance with the FCPA and this policy.

Any Employee who believes or suspects that this policy may have been violated must immediately contact the Legal Department. The Legal Department is responsible for investigating any alleged violations of this policy. We require all Employees to cooperate with us, outside legal counsel, outside auditors or other similar parties in connection with any investigation.