KESTRA MEDICALTECHNOLOGIES, LTD.

CODE OF CONDUCT

EFFECTIVE DATE: March 5, 2025

This policy applies to all Kestra Medical Technologies, Ltd. ("Kestra") affiliates and subsidiaries world-wide and supersedes the Kestra Code of Conduct in existence prior to its effective date. The Board of Directors (the "Board") of Kestra Medical Technologies, Ltd. (together with its subsidiaries, the "Company") has adopted this Code of Conduct (the "Code") in order to deter wrongdoing and promote:

1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by the Company;
3. compliance with applicable governmental laws, rules and regulations;
4. protection of Company assets, including corporate opportunities and confidential information;
5. fair dealing practices;
6. the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
7. accountability for adherence to the Code.

All Kestra employees ("Team Members") are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below.

Kestra Code of Conduct: Four Commitments

1. **Commitment to our Team Members**
   Kestra provides a respectful and productive environment for our Team Members, valuing the talents, experiences and strengths of our diverse workforce.

2. **Commitment to our Customers**
   Kestra provides our customers with high quality solutions and services that are safe, innovative and responsive to their needs at appropriate prices, and we treat our customers with respect and honesty.

3. **Commitment to the Marketplace**
   Kestra pursues growth and earnings objectives while always keeping ethical practices at the forefront of our activities. Kestra competes aggressively, but honestly and fairly within legal and ethical standards, treating our business partners, colleagues and competitors respectfully.

4. **Commitment to our Global Community**
   Kestra acts in an ethical manner as a responsible and responsive corporate citizen, supporting the global communities that we serve.

The Code is our continuing commitment to conducting our business honestly, ethically, and in accordance with all applicable laws and to empower our Team Members to hold each other accountable to this commitment.

We all share a responsibility for upholding this Code and for reporting any violations or concerns. The Code prohibits retaliations against any Team Member who raises a concern in good faith. Kestra recognizes that doing the right thing is not always easy. We operate in a heavily regulated, highly competitive environment governed by complex laws. Team Members should seek guidance from their manager, Legal Counsel or Human Resources for further in-depth discussion on topics related to ethical conduct or this Code.

Our Responsibilities

Kestra is transparent about the responsibilities we have as Team Members and intent on ensuring that each one of us receives the appropriate training and understands the importance of following the principles set forth in this Code. At Kestra, we are committed to:

- Conduct our business according to the highest ethical and legal standards.
- Follow all policies, laws and regulations that apply to our jobs.
- Report concerns or suspected misconduct immediately.

Team Members are expected to comply with the provisions of this Code and follow the laws of each relevant market in which Kestra does business. It is the responsibility of every Team Member to promptly bring violations and suspected violations of the Code to the attention of the Company. The Company does not tolerate acts of retaliation against any Team Member who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, and any such retaliation may be a violation of the Company's Whistleblower Policy.

Kestra maintains a written program to ensure compliance with the law and with these and other policies the Company may adopt. The program consists, among other things, of the Code and Business Conduct Standards, training programs, annual Certifications of Compliance to be completed by key personnel, periodic audits and a toll-free Compliance Hotline. The toll-free Compliance Hotline is available to all Team Members to report conduct believed to be in violation of the Code, FCPA Anti-Corruption Compliance Policy or any applicable standard. Compliance Hotline information will be investigated thoroughly and the identity of the source will be maintained in confidence, unless otherwise required by law.

Adherence to all laws and regulations in the countries in which we operate, and to the policies in this Code as well as the Business Conduct Standards, is a condition of employment for every

Kestra Team Member. Insider trading is unethical, illegal and a violation of the Company's Insider Trading Policy. Violations could expose the Team Member and Kestra to civil and criminal liability and could harm the Company's reputation and competitive position.

Actions prohibited by this Code involving directors or executive officers must be reported to the Audit Committee of the Board (the "Audit Committee"). Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to the reporting person's supervisor or the General Counsel. After receiving a report of an alleged prohibited action, the Audit Committee, the General Counsel or the relevant supervisor must promptly take all appropriate actions necessary to investigate the alleged prohibited action. All Team Members are expected to cooperate in any internal investigation of misconduct.

The Company must ensure prompt and consistent action against violations of this Code. If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board. If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor determines that a violation of this Code has occurred, the supervisor will report such determination to the General Counsel. Upon receipt of a determination that there has been a violation of this Code, the Board or the General Counsel will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

The Board (in the case of a violation by a director or executive officer) or the General Counsel (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code. Any waiver for a director or an executive officer shall be disclosed as required by SEC and Nasdaq rules.

Although the Code and Business Conduct Standards provide a framework to guide business conduct, they do not cover every situation. Please contact Kestra's Legal Counsel if you need assistance in understanding or interpreting them.

1. Commitment to our Team Members

Respectful Work Environment

Kestra is committed to a respectful work environment that is conducive to Team Members' performing their best work. Key components of this environment include: (i) a culture that recognizes and appreciates the contributions of a diverse work force; (ii) the absence of harassing behavior in any form; (iii) and a universal commitment to treating all Team Members with dignity and respect in whatever context interactions may occur. Every Team Member is responsible for engaging with other Team Members consistently with these elements and every manager is responsible for creating a work environment that honors these basic standards.

Kestra prohibits discrimination on the basis of race, religion, gender, color, ethnic or national origin, age, disability, sexual preference, marital status, or any other basis protected by law. This includes discrimination in hiring, training, advancement, compensation, discipline, and termination. Harassment of any kind, such as racial or sexual harassment, will not be tolerated. Code of Conduct March 2025 5 Any Team Member who believes that he or she is being treated inconsistently with the expectations of this Code should report the behavior to the appropriate manager, Human Resources or Kestra's Legal Counsel. If you become aware of any act of discrimination or harassment, you have a duty to report it. You will not face retaliation for making a good faith report.

2. Commitment to our Customers Quality

Our customers trust Kestra to provide high quality products and our continued success depends on our preservation of that trust. Kestra is committed to producing the highest quality medical devices in the interest of patient safety and to maintain its reputation for excellence. Kestra will comply with all laws and regulations regarding the safety and efficacy of its products and manufacturing standards.

Each Team Member is responsible for reporting any concerns that relate to a compromise of quality to management and/or Quality Assurance leadership. An important aspect of maintaining our quality commitment is holding suppliers accountable for the quality and safety of the products and services they provide to us. If you know or suspect anyone, including a supplier who is not upholding these commitments, it is your responsibility to report the situation.

Clinical and Regulatory Affairs

Kestra products are heavily regulated by governmental agencies, health ministries, and other regulatory authorities worldwide. Every Team Member is responsible for compliance with worldwide product regulation requirements, including marketing approvals, conduct of clinical studies, good manufacturing practice requirements and standards, design controls, labeling and advertising controls, and any other product regulations and controls promulgated by government agencies. Each Team Member is responsible for reporting any significant issues to management and/or Regulatory & Clinical Affairs leadership. Regulatory affairs managers have the responsibility to express their independent views to, as well as raise any significant issues with, Regulatory & Clinical Affairs leadership. Kestra is committed to maintaining an open, constructive and professional relationship with regulators on matters of regulatory policy, submissions, compliance, and product performance.

Customer Relationships

Business courtesies are often appropriate and build corporate goodwill between our Company and those with whom we do business. However, a conflict of interest may arise if these courtesies, gifts or donations are used to influence a business decision.

A Team Member shall not give or promise to give a benefit to a customer with an explicit or implicit requirement to use or purchase Kestra products. “Customer” is used throughout these policies to Code of Conduct March 2025 6 mean any person or entity that is in a position to purchase or influence a decision to purchase Kestra products. Certain discounts, rebates, free products, demos, equipment loaners, and warranty services furnished in the ordinary course of business are permitted, provided such benefits comply with our Global Business Conduct Standards.

Donations, Gifts, and Business Courtesies

Donations to customers or organizations closely affiliated with customers are permissible if they benefit society and promote better health care, demonstrate good corporate citizenship or serve a genuine educational function. Such donations must comply with our Business Conduct Standards and approval processes.

The giving of gifts is generally prohibited. For certain types of customers, exceptions are permissible for gifts which are modest in amount, and which could in no way cause Kestra to be embarrassed or obligated. All gifts must comply with our Global Business Conduct Standards and local guidelines.

Business courtesies such as meals, transportation, and entertainment provided to a customer must be modest in amount and related to a legitimate business purpose (e.g., explanation or demonstration of Kestra products, application of products, service capabilities, or training). Such courtesies must be in compliance with our Global Business Conduct Standards.

Payments to Customers

Kestra may compensate customers for consulting, research and other services rendered, and reasonable costs incurred where the services have value to Kestra and are rendered for fair market value. Such arrangements must be in writing in a form approved by the Kestra Legal Department and must comply with our Global Business Conduct Standards.

Kestra has a responsibility to provide instruction, education, and training on the safe and effective use of its products to health care providers. If Kestra provides honoraria or reimbursement of travel, living, or meal expenses to participants, the amount must be reasonable and in compliance with our Global Business Conduct Standards and local guidelines.

Kestra may, under some circumstances, underwrite the cost of continuing medical education conferences or professional meetings (e.g., registration fees, travel, living, and meal expenses). The laws regarding this type of support are complicated and such payments are not allowed in every country. In some countries, payments can be made only to the sponsor of the event or the institution of the attendee. All such payments must comply with our Global Business Conduct Standards, Global BCS Spending Limits and local guidelines.

Intellectual Property and Confidential Information

Kestra invests substantial resources in developing proprietary intellectual property and confidential information. Confidential information is information that is not generally known or readily available to others. Kestra protects its intellectual property by seeking patent, trademark, or trade secret protection. It protects its confidential information by taking precautions to prevent inappropriate disclosure or loss of such information.

Kestra respects the intellectual property of others. Early in the product development cycle, Kestra conducts patent searches to avoid infringing patents of others and, when necessary, makes design changes or seeks licenses. Confidential information is critical to Kestra's competitive advantage. This includes technical know-how and data, trade secrets, business plans, marketing and sales programs, and sales figures, as well as information relating to mergers and acquisitions, stock splits, divestitures, licensing activities, and changes in senior management.

Confidential information also includes personal information about Kestra Team Members, such as salaries, benefits, and information contained in personnel files. Confidential information must not be shared with others outside Kestra. Your obligation to protect this information continues after your employment ends, as stated in the confidentiality provisions you signed.

Kestra Team Members may not accept confidential information from third parties, including competitors, without the authorization of Kestra's Legal Counsel.

Protection and Proper Use of Company Assets

All Team Members should protect our Kestra assets. All Kestra assets should be used for legitimate business purposes. Incidental and occasional personal use of Kestra assets such as computers, telephones and supplies is allowed. When using Company-provided technologies, such as computers, cell phones and voicemail, you should not expect that the information you send or receive is private.

Kestra may monitor activity to make sure these resources are used appropriately and may review the information it gathers while conducting this monitoring activity. Kestra also reserves the right to block access to inappropriate internet websites, as well as the transmission of inappropriate emails or files. For more information, please review the Kestra Information Technology Policies.

3. Commitment to the Marketplace

Fair Dealing

All Team Members should deal fairly with Kestra's customers, suppliers, competitors and Team Members. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

This commitment to fair dealing means that Kestra will:

- Present accurate information to our business partners and suppliers.
- Never misrepresent facts in order to gain a competitive advantage.
- Refrain from engaging in any unlawful or unethical conduct when competing.

Conflict of Interest

A conflict of interest occurs when an individual's private interest (or the interests of their family) interferes, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when a Team Member (or a member of their family) takes actions or has interests that may make it difficult to perform their work for the Company objectively and effectively. Conflicts of interest also arise when a Team Member (or a member of their family) receives improper personal benefits as a result of their position in the Company.

Loans by the Company to, or guarantees by the Company of, obligations of Team Members or their family members are of special concern. Loans by the Company to, or guarantees by the Company of, obligations of any director or executive officer (or their family members) are expressly prohibited.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

Persons other than directors and executive officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, their supervisor or the General Counsel. A supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the General Counsel with a written description of the activity and seeking the General Counsel's written approval. If the supervisor is themself involved in the potential or actual conflict, the matter should instead be discussed directly with the General Counsel.

Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee.

Corporate Opportunities

Team Members may not take for personal use opportunities that are discovered through the use of corporate property, information or position, nor may they use corporate property, information or position for their own personal gain or to compete with Kestra. Notwithstanding the above, pursuant to the Amended and Restated Bye-Laws of Kestra (the "Bye-Laws"), and to the fullest extent permitted by law, none of the Company's Principal Shareholder and its Affiliates (each, as defined in the Bye-Laws) or the members of the Company's Board who are not employees of the Company (each, a "Non-Employee Director") or his or her Affiliates shall have any duty to refrain from directly or indirectly engaging in the same or similar business activities in which the Company currently engages or proposes to engage in. Pursuant to the Bye-Laws, the Company renounces any interest in any business opportunity presented to any Non-Employee Director unless such opportunity is offered to a Non-Employee Director solely in his or her capacity as a director or officer of the Company. Team Members have a duty to advance Kestra's interests when the opportunity to do so arises.

Prohibition Against Improper Payments

A Team Member shall not pay or promise to pay bribes, kickbacks, or other payments for unlawful or improper purposes to or for the benefit of government employees or officials, customers or others. This rule extends not only to direct payments, but also to indirect payments made in any form through consultants or other third parties, such as distributors or agents. Additional guidance is available in our Global Business Conduct Standards and Global Anti-Corruption Policy.

People Acting on Behalf of Kestra

Kestra expects its independent dealers, distributors and agents to comply with the policies set out in this Code. The Kestra manager responsible for any such relationship must ensure that the terms of the relationship are set out in a written agreement, provide a copy of the Code, and require compliance with the Code in all dealings on behalf of Kestra. Promoting or engaging in any practices that violate the principles of this Code may result in termination of the relationship.

Antitrust/Competition

Antitrust laws in the U.S. and competition laws outside the U.S. exist to ensure free and open competition in the marketplace, a principle that Kestra fully supports. These laws are complex and carry significant criminal and civil penalties if violated. Team Members may not take any collaborative action with a competitor, without prior advice from Kestra's Legal Counsel, and may never take any action that could have an improper anti-competitive effect.

Avoid the following prohibited conduct:

- Agreements or understandings with competitors, either directly or through others, to fix prices, divide customers or territories, or restrict sales;
- Exchange of pricing or other proprietary information with competitors; and
- Illegal tying, illegal price discrimination or refusals to deal.

Kestra management is expected to maintain basic familiarity with the principles and purposes of the antitrust laws as they apply to Kestra business, and to abstain from any activities that might violate or create any appearance of intention to violate such laws.

Kestra Team Members are expected to understand the antitrust principles that apply to their activities. All Team Members are encouraged to seek guidance from Kestra's Legal Counsel whenever a question arises.

Export Controls, Economic Sanctions and International Boycotts

Kestra must comply with export control and economic sanctions laws of the United States, as well as those of other countries in which it does business. These laws restrict transfers, exports, and sales of products or technical data from the United States to certain prescribed countries and persons as well as re-exports of certain such items from one non-U.S. location to another. These laws also prohibit or restrict other business and financial dealings with certain countries, governments, and parties. Kestra and its Team Members are required to comply with these laws without exception. These laws are complicated, and Team Members should contact Kestra's Legal Counsel whenever a question arises.

In addition, U.S. law prohibits cooperation with certain boycotts imposed by some countries against others and further requires that any request in furtherance or support of such boycotts be reported to the U.S. Government. Kestra Team Members may not cooperate with any prohibited boycotts and must report any request for cooperation immediately to management or Kestra's Legal Counsel.

Disclosure

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each director, officer and Code of Conduct March 2025 11 employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

Each director, officer and employee who is involved in the Company's disclosure process must:

4. Be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and
4. Take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

Recordkeeping

Kestra entities will maintain accurate Company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. Finance managers for Kestra businesses, including subsidiaries worldwide, have the responsibility to express their independent views to, and raise any significant issues with, the Chief Financial Officer ("CFO").

Records and accounts must be complete and not misleading. All Company accounting records, and the reports produced from those records, must be kept and presented in accordance with all applicable laws and relevant accounting standards.

No undisclosed or unrecorded funds or assets of Kestra may be maintained for any purpose. No more than one set of books may be maintained, and no false or artificial entries may be made in any accounts.

Government, Analyst and Media Inquiries

Kestra must be made aware of any inquiries from the government, the financial/analyst community, or the media so that it can properly and thoroughly respond. If a Kestra Team Member is contacted by a representative of a governmental agency seeking an interview or making a nonroutine request for documents, that Team Member should immediately contact Kestra's Legal Counsel so that appropriate arrangements can be made to fully comply with the Company's legal obligations. All inquiries from the financial/analyst community should be referred to the CFO. All media inquiries should be referred to Marketing Communications in the U.S. or to the authorized person or department outside the U.S.

4. Commitment to our Global Community Environmental Management

Kestra is committed to doing business in an environmentally responsible manner and will strive to improve its performance to benefit its Team Members, customers, communities and the environment. We are committed to engaging in environmentally sound practices. We must also Code of Conduct March 2025 12 continually assess and strive to improve our processes. If you know of a practice that is harmful to the environment of does not comply with our Company's policies or with governing laws, rules and regulations, you have a duty to report it.

Safety and Health

Kestra is committed to a safe, healthy work environment that is in compliance with all applicable laws and regulations. All Team Members are expected to develop a proactive, cooperative attitude toward issues of health and safety throughout the Company. We must follow all safety procedures and report any safety hazards or unsafe behavior. Acts or threats of violence interfere with our commitment to health and safety and will not be tolerated.

Volunteer and Political Support for our Communities

Kestra makes a positive difference in the communities where we live and work through our volunteer and political activities. Team Members are free to make personal charitable contributions. Team Members who wish to take part in volunteer activities during work hours must obtain approval from their managers. Kestra supports the right to participate actively in the political process. However, a Team Member must have written approval in advance from the Kestra Chief Executive Officer or General Counsel for solicitations made during work hours or on Kestra property on behalf of any political party, candidate committee or other election fund. No corporate funds, or other corporate assets, may be contributed directly to any political party, political committee or candidate for public office at the federal level, or at the state level unless permitted by law.

Contact Information

Legal Department: legal@kestramedical.com

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Legal Department

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Attention: General Counsel

425-403-2098

Office of Compliance & Ethics

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c/o General Counsel

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