



MEDIWOUND LTD.

WHISTLEBLOWER POLICY

I. PURPOSE

The rules and regulations of the U.S. Securities and Exchange Commission (the “SEC”) the Securities and Exchange Act of 1934, as amended, the Audit Committee Charter of MediWound Ltd. (the “Company”), and U.S. Federal procurement laws and regulations require the Company’s Audit Committee (the “Audit Committee”) to establish procedures for:

- the submission by employees of the Company or other persons retained by the Company on a regular basis (each, an “employee”), on a confidential and anonymous basis, of concerns regarding (i) questionable accounting, internal accounting controls or auditing matters, (ii) the reporting of fraudulent financial information (iii) known or suspected violations of the Company’s Code of Business Conduct and Ethics (the “Code of Business Conduct and Ethics”), (iv) violations of U.S. Federal criminal laws involving fraud, conflict of interest, bribery, or illegal gratuities or violations of the civil False Claims Act, or (v) violations of the rules and regulations of the Securities and Exchange Commission applicable to the Company (each such matter, hereinafter, a “complaint”); and
- the receipt, retention, treatment, and reporting of complaints received by the Company regarding issues covered by the Whistleblower Policy set forth herein (this “Whistleblower Policy”).

This Whistleblower Policy is intended to facilitate disclosures, encourage proper individual conduct and alert the Audit Committee to potential issues before serious consequences result. References to the “Company” include any subsidiary of the Company.

II. PROCEDURE

1. Scope. Any employee of the Company may submit, on a confidential and anonymous basis, any complaints or concerns regarding (i) financial statement disclosures, accounting, internal accounting controls or auditing matters, (ii) the reporting of fraudulent financial information, (iii) known or suspected violations of the Code of Business Conduct and Ethics, (iv) a violation of U.S. Federal criminal laws involving fraud, conflict of interest, bribery, or illegal gratuities or a violation of the civil False Claims Act, or (v) violations of the rules and regulations of the SEC applicable to the Company.
2. Submission Procedure. Complaints and concerns regarding the matters covered under this Whistleblower Policy may be reported anonymously and confidentially through (i) a weblink established by the Company through a third-party provider, (ii) a toll-free number provided by such third-party provider, (iii) an email address provided by such third-party provider, or (iv) the submission of a sealed envelope to the Company’s General Counsel (the “Compliance Officer”) or Chief Financial Officer (the “CFO”), as described below.
3. Treatment of Complaints. Complaints will be directed initially to the Company’s Compliance Officer. A complaint that, in the Compliance Officer’s opinion, is not related to any of the matters expressly covered by this policy or that is lacking in details that permit a meaningful investigation will not be investigated by the Audit Committee. Notwithstanding this provision, the Compliance Officer will immediately forward a complaint containing credible information regarding a human trafficking violation to the Audit Committee, which will proceed with the applicable reporting obligations described in Section II.6. If the complaint will not be investigated and includes the name or contact information of the complaining employee, the employee will be



advised that such complaint does not fall under the scope of this policy and that he or she should consider submitting the complaint to the CFO or other manager, as appropriate, and if the complaint does not include the name or contact information of the complaining employee, it will be forwarded by the Compliance Officer to the appropriate manager for handling in a manner which such manager deems appropriate and in accordance with Company policies.

Complaints received by the Compliance Officer falling under the matters covered by this Whistleblower Policy shall be promptly forwarded to the Chairperson of the Audit Committee or any other member of the Audit Committee designated for this purpose. If an employee wishes to discuss any matter with the Audit Committee, the employee should indicate this in his or her complaint. The Compliance Officer will inform the reporting person (if his or her identity is known) that the complaint has been received and, to the extent appropriate, provide him or her with the steps taken to investigate the complaint.

4. Evaluation and Investigation of Complaints. The Compliance Officer or any other person designated by the Chairperson of the Audit Committee will perform an initial evaluation of the complaint to determine if it involves any of the matters addressed by this Whistleblower Policy. If the complaint appears to involve accounting, internal accounting controls, auditing matters, or violations of the Code of Business Conduct and Ethics, the complaint will be reviewed and, if necessary, investigated, by the Audit Committee in a manner to be determined by it. One or more members of the Audit Committee or any other person designated for that purpose by the Audit Committee may be delegated the authority to investigate the complaint. In conducting any such investigation, the anonymity of the employee making a complaint or submission on a confidential basis shall be maintained to the fullest extent possible consistent with the need to conduct an adequate review thereof. If the Audit Committee so requests, a written report to the Audit Committee of all findings of fact, conclusions and proposed recommendations for remedial action, if any, will be submitted within the timeframe set by the Audit Committee.
5. Meetings. Complaints submitted under this Whistleblower Policy will be reviewed and discussed at the regularly scheduled Audit Committee meetings. The Chairperson of the Audit Committee will call a special meeting of the Audit Committee if he or she believes that a submitted complaint requires immediate attention, such as complaints regarding violations of the Code of Business Conduct and Ethics, violations of U.S. Federal criminal laws involving fraud, conflict of interest, bribery, or illegal gratuities, or violations of the civil False Claims Act.
6. Reporting. Upon concluding its review or investigation of a complaint, the Audit Committee shall prepare a written report regarding the nature of the complaint, the review or investigation process and its recommendations. The Audit Committee shall submit its report to the Chairman of the Board of Directors.
In addition, the Committee will provide a regular update of the status of the investigation of any pending complaint to the Compliance Officer not less than once each fiscal quarter to evaluate whether any disclosure is required with respect to such complaint in the Company's filings with the SEC. In addition, the Audit Committee will promptly notify the Compliance Officer and, if relevant, Human Resources Manager of any development with respect to a pending complaint that may be material to the Company.
The Audit Committee, in consultation with the Legal Department, will also timely disclose to appropriate U.S. Government Officials any credible evidence of (i) a violation by the Company, Company Personnel, or subcontractors, in connection with the award, performance, or closeout of a U.S. Government prime contract or subcontract, of Federal criminal laws involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code or a violation of the civil False Claims Act, or (ii) a significant overpayment other than overpayments resulting from contract financing payments. Further, the Audit Committee, in consultation with the Legal Department, will immediately disclose to appropriate U.S. Government Officials any credible information regarding possible violations by the Company,



Company Personnel, or Company agents or subcontractors of the U.S. Government's policy prohibiting trafficking in persons.

III. ADMINISTRATION

The Audit Committee is responsible for the administration of this Whistleblower Policy. The Chief Executive Officer of the Company will take corrective and disciplinary actions, if appropriate, based on the findings of the investigations, which actions may include, alone or in combination, a warning or letter of reprimand, demotion, loss of merit salary increase, bonus or stock options, suspension without pay or termination of employment and any other actions in accordance with the Code of Business Conduct and Ethics. The Board of Directors shall decide on corrective and disciplinary action with respect to the Chief Executive Officer, if necessary.

IV. MISCELLANEOUS

1. No Retaliation. The Company does not permit retaliation of any kind against employees for complaints submitted hereunder that are made in good faith.
2. Record Keeping. The Audit Committee shall retain as a part of the records of the Audit Committee any such complaints or concerns for a period of no less than seven (7) years from the date on which the complaint was submitted.
3. Notice to Employees. A notice to the employees of the Company regarding the adoption of this Whistleblower Policy shall be published in substantially the form attached hereto as Exhibit A.
4. Review of Policy. The Audit Committee shall review and assess on an annual basis the adequacy this Whistleblower Policy.

Adopted: March 9, 2014 (Last Update March 21, 2024)



EXHIBIT A

Form of Notice to Employees - Whistleblower Policy

An employee of MediWound Ltd. or its subsidiaries (the “Company”) may submit a good faith complaint or concern about (i) the Company’s accounting, internal accounting controls, auditing practices, (ii) the reporting of fraudulent financial information, (iii) violations of the Company’s Code of Business Conduct and Ethics, (iv) violations of U.S. Federal criminal laws involving fraud, conflict of interest, bribery or illegal gratuities, or violations of the civil False Claims Act, and (v) violations of the rules and regulations of the Securities and Exchange Commission (the “SEC”) applicable to the Company (each, hereinafter, a “complaint”). We encourage you to take advantage of these procedures to make us aware of your complaints or concerns.

Complaints and concerns may be reported anonymously and confidentially through (i) a weblink established by the Company through a third-party provider at is <https://www.whistleblowerservices.com/mdwd>, (ii) a free number provided by such third-party provider at +1-844-406-7261, or (iii) the submission of a sealed envelope to the Company’s General Counsel (the “Compliance Officer”) or Chief Financial Officer. If you choose to use the web link, simply click on the web link and follow the instructions you are given.

Employees are encouraged to use these methods, which are designed to permit an employee to complain freely, without involvement of their supervisor or fear of retaliation, about conduct that they believe should be reported under the Whistleblower Policy. Anonymous complaints should be factual instead of speculative or unsupported and should contain as much specific information as possible to allow the persons investigating the complaint to adequately assess the nature, extent and urgency of the situation. Employees should realize that if an anonymous complaint cannot be properly investigated without additional information, we may have to close the matter for lack of sufficient information. If a reporting employee wishes to disclose his or her identity, the employee may, but is not required to, do so. Deliberately providing false information as part of a complaint or during an investigation into a complaint shall be grounds for disciplinary action, including termination of employment or engagement with the Company.

The Compliance Officer has been authorized by the Audit Committee to determine, in its discretion, whether or not an employee’s complaint falls within the matters covered under the Whistleblower Policy. If it does, the Audit Committee will review and, if it deems necessary, direct an investigation of your complaint and issue a report with its findings and recommendations that will be submitted to the Chairman of the Board of Directors. If, on the other hand, a complaint is determined not to be related to any of the matters expressly covered by this policy or is lacking in details that permit a meaningful investigation, the Compliance Officer will either: (i) if the employee provided contact information when making the complaint, inform the employee that his or her complaint is not appropriate for investigation under this policy, or (ii) if no contact information from the employee is available, forward the complaint to the appropriate manager within the Company.

Under the rules and regulations of the SEC, the Company and its management are prohibited from discharging, demoting, suspending, threatening, harassing or in any manner discriminating against any employee as a result of any good faith complaint. If you believe you are or have been subjected to reprisal, threats, discrimination, harassment, retribution, or retaliation for having submitted a Complaint or for participating in an investigation related to a Complaint then immediately report the issue to the Compliance Officer, an executive officer or any supervisor. The Company will promptly and thoroughly investigate any assertion that a manager, supervisor or employee is involved in discrimination, retaliation or harassment related to your reporting of, or the Company’s subsequent investigation of, a Complaint. The Company will not tolerate discrimination, retaliation or harassment;



if such behavior is substantiated then the Company will take appropriate action, up to and including termination.

If you have any questions about this policy, please contact the Compliance Officer.