

Investigations and Whistleblower Policy

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1. Purpose

The purpose of this Whistleblower Policy (this “**Policy**”) is to promote honest, ethical and lawful conduct, full, fair, accurate, timely and transparent disclosure, and compliance with applicable laws, rules and regulations by directors, officers and employees of Agiliti, Inc. and its subsidiaries (the “**Company**”), in order to bring to the attention of the Company potential illegal or unethical conduct, including violations of federal securities laws (as further defined below, “**Inappropriate Conduct**”), and provide reassurance that any director, officer or employee of the Company who communicates bona fide concerns regarding Inappropriate Conduct will be protected from discrimination, retaliation, harassment or other reprisals (collectively, “**Reprisals**”). The Audit Committee (the “**Audit Committee**”) of the Company’s Board of Directors (the “**Board**”) has established this Policy to establish guidelines and procedures for the reporting and review of concerns regarding questionable accounting, internal accounting controls or auditing matters, compliance with any legal or regulatory requirements, the Company’s Code of Conduct (the “**Code**”) or any of the Company’s other compliance policies or procedures, or any other matter that could cause serious damage to the Company’s reputation (each a “**Complaint**”).

The Company is committed to high standards of ethical, honest and legal business conduct. It is the policy of the Company to encourage directors, officers and employees of the Company, when they in good faith believe that any Inappropriate Conduct has occurred, is occurring or is about to occur, to promptly report those beliefs. The Company strictly prohibits Reprisals by any director, officer, employee or agent of the Company against any director, officer or employee of the Company who brings a Complaint or expresses concerns to the Company’s attention.

The Audit Committee or the Board can modify this Policy unilaterally at any time without notice. Modification may be necessary to, among other things, maintain compliance with applicable legal requirements or to accommodate organizational changes regarding the Company.

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2. Scope

Applies to all directors and employees of the Company.

3. Inappropriate Conduct

Inappropriate Conduct may include, but is not limited to, the following:

- Irregular accounting methods, financial reporting practices or auditing conduct including fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company; fraud or deliberate error in the recording or maintaining of financial records of the Company; deficiencies in or noncompliance with the Company's internal accounting controls; misrepresentations or false statements to or by a senior officer of the Company or an accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; and deviation from full and fair reporting of the Company's financial condition.
- Unusual or dubious payments or arrangements.
- Violations of state or federal securities laws, the Foreign Corrupt Practices Act or similar anti-bribery statutes, and the DFA.
- Any other activity that may violate federal, state or local (which includes foreign jurisdictions in which we conduct business) laws or regulations or is otherwise unlawful.
- Violations of the rules and regulations of any principal market or transaction reporting system on which the Company's securities are traded or quoted.
- Substantial and specific danger to the health and safety of directors, officers or employees of the Company or the general public.
- Other activities in violation of the Code, the Company's Group Purchasing Code of Conduct or any of the Company's other policies.

4. Reporting a Complaint

The procedures in this Policy are intended for serious and sensitive issues. If a director, officer or employee of the Company has reason to believe that there exists Inappropriate Conduct at the Company, such director, officer or employee of the Company should promptly report this information to the Company's Chief Compliance Officer, the Company's General Counsel, Human Resources, or the Chair of the Audit Committee, or by contacting the Company's confidential and anonymous Compliance Line (collectively, the "**Recipients**"). The telephone numbers and contact information for the confidential and anonymous Compliance Line may be found by clicking on the

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Whistleblower Hotline located on the Investor Relations - Governance section of the Company's website, and at the following address: www.lighthouse-services.com/agiliti. If a director, officer or employee of the Company has reason to believe that an executive officer of the Company is involved in the Inappropriate Conduct, such director, officer or employee (as the case may be) is encouraged to promptly in good faith report this information directly to the Chair of the Audit Committee.

Directors, officers and employees of the Company are encouraged to bring a Complaint to any Recipient as promptly as practicable because the Company will likely have greater success rectifying Inappropriate Conduct when a Complaint is expressed in a timely fashion. Although the applicable director, officer or employee of the Company is not expected to prove the truth of an allegation, such director, officer or employee of the Company (as the case may be) should be able to demonstrate that the Complaint is being made in good faith with reasonable factual support.

The Company encourages directors, officers and employees of the Company to put their names on Complaints, as appropriate follow-up questions and investigation may require more detailed information from the source of the Complaint in order to quickly and efficiently ascertain the facts behind the reported incident. Directors, officers or employees of the Company who prefer anonymity may send a letter to any Recipient or use the Company's Compliance Line, which is not equipped with a caller ID function.

5. Content of Complaints

To assist in the response to or investigation of a Complaint, the Complaint should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Complaint. Without limiting the foregoing, the Complaint should, to the extent possible, contain the following information:

- the alleged event, matter or issue that is the subject of the Complaint;
- the name of each person involved;
- if the Complaint involves a specific event or events, the approximate date and location of each event;
- any additional information, documentation or other evidence available to support the Complaint.

A Complaint that contains unspecified wrongdoing or broad allegations without verifiable evidentiary support will reduce the likelihood that an investigation based on such Complaint will be initiated. In addition, it is less likely that an investigation will be

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initiated in response to an anonymous Complaint due to the difficulty of interviewing an anonymous complainant and evaluating the credibility of his or her Complaint.

6. Treatment of Complaints

Complaints will be kept confidential by the Company to the extent practicable, consistent with the Company's desire to conduct and conclude a thorough investigation. In certain circumstances, the Company may be obligated by law to disclose the information, or the identity of the person providing the information, with respect to the Complaint.

If a director, officer or employee of the Company who has made a Complaint or participates in the investigation of a Complaint has reason to believe that such director, officer or employee (as the case may be) has been or will be the target of a Reprisal, such director, officer or employee should promptly report this information to a Recipient.

7. Investigations

Any Complaints of a serious nature or regarding an executive received by a Recipient will be forwarded to the chair of the Audit Committee. The chair of the Audit Committee will direct the Chief Compliance Officer or General Counsel to conduct or oversee an initial inquiry into the Complaint and to submit an initial report of findings to the chair of the Audit Committee. All other Complaints will be investigated and reported to the chair of the Audit Committee at regularly scheduled meetings.

All directors, officers and employees of the Company have a duty to promptly cooperate and provide accurate information in connection with any investigation of a Complaint, or of Reprisals resulting from the reporting or investigation of such Complaint.

In connection with the investigation of a Complaint, the Audit Committee and the Chief Compliance Officer or General Counsel may consult with, and obtain the assistance of, any member of management of the Company who is not the subject of such Complaint. In addition, the Audit Committee and the Chief Compliance Officer or General Counsel may, in the sole discretion thereof, retain independent legal, accounting or other advisors as may be deemed necessary or appropriate thereby.

The specific action taken in the case of any particular Complaint will depend on the nature and gravity of the Inappropriate Conduct reported and the facts established in the investigation thereof.

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Where Inappropriate Conduct has occurred, such Inappropriate Conduct will be corrected to the extent practicable and the persons responsible for such Inappropriate Conduct and those failing to cooperate or providing false information during the investigation of such Inappropriate Conduct will be subject to disciplinary action, potentially including termination from the Company.

8. Record of Complaints and Investigations

The Audit Committee, with the assistance of the General Counsel, will maintain a log of all Complaints, tracking the receipt, investigation and resolution thereof. Such log and copies of Complaints will be maintained in accordance with the Company's document retention practices.

9. Rules, Rights and Responsibilities of Employee Complainants And Investigation Participants

Employee Complainants

Employee Complainants have a responsibility to act in good faith and provide initial information that is grounded in a reasonable belief regarding the validity of a Complaint. The motivation of an Employee Complainant is irrelevant to the consideration of the validity of the Complaint. Directors, officers and employees of the Company are not subject to disciplinary action for factual statements or errors made in good faith. However, the intentional filing of a false Complaint, whether orally or in writing, may itself be an improper activity and one that may result in disciplinary action.

An Employee Complainant has a responsibility to be candid and set forth all known information regarding a Complaint. An Employee Complainant acknowledges that an investigation may not proceed if the Employee Complainant does not agree to be interviewed or provide further information regarding the Complaint.

Employee Complainants are not to act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Audit Committee, Counsel or the Investigation Team. An Employee Complainant shall not be part of an Investigation Team unless expressly requested by the Audit Committee. An Employee Complainant shall refrain from obtaining evidence relating to a Complaint for which he or she does not have a right

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of access. Such improper access may itself be an illegal or improper activity and one that may result in disciplinary action.

The Company will use reasonable efforts to provide each Employee Complainant with a response to his or her Complaint and a summary of the outcome of any investigation based upon the Complaint unless Counsel or the Audit Committee determines that there are overriding legal or Company/public interest reasons not to do so.

These procedures are in no way intended to limit employee reporting of alleged violations relating to accounting or auditing matters to proper governmental and regulatory authorities.

Investigation Participants

Company employees who are interviewed, asked to provide information or otherwise participate in an investigation of a Complaint, including employees who are the subject of the investigation (“Investigation Participants”) have a duty to cooperate fully with the Chief Compliance Officer, General Counsel, Audit Committee and/or the Investigation Team, as applicable and assist in the investigation.

Investigation Participants should refrain from discussing the investigation or their testimony with those not connected to the investigation. If the Investigation Participant knows the identity of the Employee Complainant, the Investigation Participant should not discuss with the Employee Complainant the nature of evidence requested or provided, or testimony given unless authorized.

Requests for confidentiality by Investigation Participants will be honored to the fullest extent reasonably practicable within the law and the legitimate needs of the investigation.

Rights of Employee Complainants and Investigation Participants

Employee Complainants and Investigation Participants are entitled to protection from retaliation for having made a Complaint or disclosing information relating to a Complaint in good faith. The Company shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against an Employee Complainant in the terms and conditions of employment based upon any lawful actions of such Employee Complainant with respect to good faith reporting of Complaints. It is a

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serious violation of the policies of the Company, and under certain circumstances a violation of federal or local law, for any supervisor, manager, director, or officer of the Company to initiate or encourage reprisal against an employee or other person who in good faith reports a known or suspected violation of criminal law or any other matter which may be reported under this policy. An Employee Complainant’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Complaint or an ensuing investigation.

To the extent possible and permitted under law, Complaints, reports and investigations related to such Complaints, shall be kept confidential. Disclosure of such Complaints to individuals not connected to the investigation will be viewed as a serious disciplinary offense and may result in discipline, including dismissal.

10. Protected Rights for External Reporting of Inappropriate Conduct

Notwithstanding the requirements of any agreement entered into between any director, officer or employee and the Company or included in any policy of the Company applicable to such persons, nothing in such agreement or policies precludes such persons from communicating directly with the U.S. Securities and Exchange Commission (“**SEC**”) or the Financial Industry Regulatory Authority regarding potential securities issues or concerns, if any, and that nothing in any such agreement or policies is intended to, or shall, interfere with any rights of such persons to file a charge or complaint with, communicate with, participate in a proceeding or investigation that may be conducted by, or cooperate with the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration, the SEC or any other federal, state or local government agency or commission (including providing documents or other information to such agencies), none of which shall constitute a breach of such agreements or policies. Directors, officers or employees do not need prior authorization from the Company to make any such governmental reports or disclosures, and are not required to notify the Company when taking any such action. No confidentiality provision included in any agreement entered into between any director, officer or employee and the Company or included in any policy of the Company applicable such persons shall limit such persons right to receive an award under any whistleblower or similar governmental program.

The rights and protections described in this Policy include those in 41 U.S.C. § 4712 (implemented by FAR 52.203-17, Contractor Employee Whistleblower Rights and Requirement to Inform Employees of Whistleblower Rights) and 10 U.S.C. § 2409

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(implemented in DFARS 203.9, Whistleblower Protections for Contractor Employees).