



## **COMPREHENSIVE COMPLIANCE PROGRAM & DECLARATION OF COMPLIANCE**

Axogen has established and maintains an effective compliance program in accordance with federal, state, and industry regulations and guidelines in accordance with the "Compliance Program Guidance for Pharmaceutical Manufacturers" published by the Office of Inspector General, U.S. Department of Health and Human Services (The "HHS-OIG Guidance"). We are committed to the highest standards of business conduct, and this Compliance Program is a key component of our efforts to ensure these standards are met.

The aim of our Compliance Program is to help prevent, detect, and remediate violations of law, regulations, or Company Policies with respect to the marketing of our products. The HHS-OIG Guidance recognizes that the implementation of such a program cannot guarantee the complete elimination of improper employee conduct. It is Axogen's expectation that employees will comply with our Business Code of Ethics and our policies established in support of such Codes. In the event that we become aware of violations of law, regulations, or our Company Policies, we will investigate the matter and, where appropriate, take disciplinary action and implement corrective measures to prevent future violations.

### **Statement of Annual Aggregate Limit**

California Health and Safety Code §§ 119400, 119402 requires pharmaceutical companies to adopt a Comprehensive Compliance Program that imposes an annual aggregate dollar limit on gifts and expenditures provided to medical and healthcare professionals ("HCPs"). In accordance with the requirements of California's law, Axogen has determined an annual aggregate limit on gifts, promotional materials, and items or activities that may be provided to HCPs within California. In setting the aggregate annual limit, Axogen has taken into account the development stage of the company and the size and scope of its product portfolio. As the size of the company and product portfolio changes, Axogen may revise its annual aggregate limit.

It is important to note that Axogen's annual aggregate limit represents a maximum limit and is not a spending goal. In tracking expenditures, Axogen excludes from its annual aggregate limit the following items that are exempt under California law: (1) demo product given to HCPs for education and/or training purposes; (2) financial support for continuing medical education forums; (3) financial support for grants and donations; and (4) payments made at fair market value for legitimate professional services provided by HCPs. For the purpose of making its declarations under California law, Axogen applies its annual aggregate limit to expenses incurred during the calendar year (January 1st through December 31st of each year).

### **Declaration of Compliance**

Axogen declares, in good faith, that it is in compliance with the requirements for an effective Compliance Program, which incorporates the principles articulated in the HHS-OIG Guidance, and the requirements of California Health and Safety Code §§ 119400-119402. Our declaration is based upon an analysis of information available as of the date of this declaration. While we cannot completely eliminate the possibility that an individual employee will violate these standards, our Compliance Program is designed to prevent, detect, and address violations of state and federal laws as well as our own internal policies and procedures. As appropriate and in accordance with the law, Axogen will amend and update its policies and procedures and this Declaration as necessary to assure compliance. This Declaration is effective as of March 1, 2026.

### **Contact Information**

Copies of this declaration and the above description of our Comprehensive Compliance Program may be obtained by emailing [Compliance@axogeninc.com](mailto:Compliance@axogeninc.com).