



DELIVERING HEALTHCARE INNOVATION

Improving the lives of patients with vascular disease

Comprehensive Compliance Program and California Declaration

APRIL 2026

Purpose of the Comprehensive Compliance Program

The fundamental elements of our Comprehensive Compliance Program (“Compliance Program”) are described below. Our Compliance Program is constantly evolving to meet the changing needs and demands of the compliance environment and of Endologix. We continuously review and enhance our Compliance Program and reserve the right to continue to do so at any time in the future without notice.

Endologix conducts its business in compliance with all applicable federal and state statutes and regulations, as well as applicable industry guidelines that govern the medical device industry.

It is illegal to provide, offer, or agree to provide or offer, or accept, obtain, or agree to accept or attempt to obtain, a kickback or bribe. A kickback or bribe may be defined as any money, fee, payment, commission, credit, gift, gratuity, transfer of value, or compensation of any kind that is provided directly or indirectly, and that has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business transaction. Endologix’ position on kickbacks and bribes is clear – they are illegal and are not allowed.

An individual who is unsure whether a violation of any law, regulation or policy occurred must seek advice from their manager/supervisor. Complaints, suggestions for improvements or reports of alleged violations of law should be made via the company’s Communication Channels (Open Door Reporting or Hotline) to any member of Senior Management, Legal, Compliance or Human Resources. They may be made anonymously if desired. Anonymity will be maintained during the investigation to the extent practicable and in the best interests of Endologix.

It is not sufficient simply to take note of the Compliance Program. Every individual is responsible for implementation of these standards and is called upon to review his or her own behavior in light of the standards and to determine where improvements are possible.

Problems must be actively addressed. There may be a duty both to provide and to obtain information. Compliance with these policies will be a part of every individual’s performance evaluation.

Employees should be aware of the Federal Anti-Kickback Statute (AKS), and the constraints it places on the marketing and promotion of products reimbursable by any Federal health care programs. The AKS is a criminal prohibition against payments (in any form, whether the payments are direct or indirect) made in whole or in part to induce or reward referrals of Federal health care business. The AKS potentially implicates not only the offer or payment of anything of value for patient or business referrals, but also the offer or payment of anything of value in return for purchasing, leasing, ordering, or arranging for or recommending the purchase, lease, or ordering of any item or service reimbursable in whole or part by a federal health care program. Endologix’ products are regularly prescribed and utilized in medical procedures paid for under Federal health care programs. Violations of the AKS can result in criminal sanctions, exclusion/debarment from government programs and/or civil fines to both the individual or entity that authorizes, offers or pays a kickback, and the individual or entity that solicits or receives the kickback.

Fundamental Guidelines of the Compliance Program

Endologix strives to obey the laws and regulations that govern its business. All individuals must respect and obey all laws, rules and regulations that apply to our business. All individuals should understand the laws and regulations which apply to them in the performance of their duties and ensure that Endologix complies with the laws, rules and regulations, as well as the codes and policies that govern how Endologix conducts business. Without reservation, Endologix adopts and advocates the AdvaMed Code of Ethics which facilitates our company's ethical interactions with Health Care Professionals in the United States, and the European MedTech Code of Ethical Conduct which is intended to provide guidance as to the minimum standards which apply to our business practices in Europe and, generally, elsewhere.

LEADERSHIP

We have implemented and maintain the Compliance Program, which includes policies, procedures, training, monitoring, conducting investigations, and establishing best practices and preventative measures.

POLICIES AND PROCEDURES

Our Compliance policies contain the procedures that Endologix has adopted to demonstrate the company's commitment to ethical, honest and responsible conduct when interacting with Health Care Professionals.

TRAINING AND EDUCATION

Employees undergo compliance training on the laws and industry guidelines regarding business transactions with Health Care Professionals.

EFFECTIVE LINES OF COMMUNICATION

Endologix encourages open and direct communication and discussion regarding any requests for guidance or clarity, and/or compliance concerns. Endologix provides several Communication Channels employees can use to ask a question, obtain guidance, or report a compliance concern. Communication Channels for reporting concerns include talking with a direct supervisor, any member of Senior Management, Legal, Compliance or Human Resources departments, or utilizing the company's Hotline, an independent, third-party toll-free telephone number or Web portal that anyone can access 24 hours a day, 7 days a week. The Hotline handles calls in multiple languages. Endologix does not tolerate any form of retaliation against an individual arising from a good-faith report of a potential violation of our Compliance Program, a related policy, or of an integrity concern. Anonymous reports can be made via the Endologix Hotline: 1.855.271.2822 OR WEB PORTAL: WWW.ENDOLOGIXHOTLINE.ETHICSPPOINT.COM.

REMEDATION AND DISCIPLINARY STANDARDS

We have standards of conduct for individuals relating to internal investigations and managing alleged and confirmed instances of non-compliance. We consistently undertake appropriate corrective action to address inappropriate conduct and to deter future violations. Endologix maintains a high standard of disciplinary measures in the event of non-compliance.

ACCOUNTABILITY

We support ethical behavior and require employees to adhere to the policies in the Compliance Program and the Global Business Practice Standards as a condition of their employment. Employees certify that s/he understands these standards of conduct for investigations, and subsequent disciplinary actions.

AUDITING, MONITORING AND ENFORCEMENT

Compliance conducts periodic monitoring and internal audits of the company regarding interactions with and/or payments to Health Care Professionals. If a violation has occurred, reasonable steps are taken to respond appropriately to the violation, prevent the occurrence of future violations, and support preventative measures and corrective actions.

California Compliance Program Declaration

DISTINCTION OF DEVICE MANUFACTURERS

The AdvaMed Code of Ethics on Interactions with Healthcare Professionals recognizes that the medical device industry is significantly different than the pharmaceutical industry. Consistent with the HHS-OIG Guidance, we have tailored our Comprehensive Compliance Program to the nature of our business as a medical device manufacturer.

While the California law makes reference to compliance with the PhRMA Code on Interactions with Healthcare Professionals, we manufacture medical devices rather than pharmaceutical products, and have therefore adopted the AdvaMed Code policies and procedures for compliance, which are substantially similar to the PhRMA Code. Thus, while we have formally adopted the AdvaMed Code, we believe that adherence to the AdvaMed Code also constitutes compliance with the PhRMA Code for purposes of satisfying the requirements of the California law.

We believe that our Comprehensive Compliance Program is reasonably designed to prevent and detect violations.

DESCRIPTION OF COMPLIANCE

We hold ourselves to the highest standards of business conduct. It is imperative we comply with the many laws and regulations that affect our activities worldwide and act in accordance with the company's Values, including "ethics as priority". As part of our overall continuing efforts in the area of compliance, we have a Comprehensive Compliance Program ("Compliance Program") that is reasonably designed to prevent and detect violations.

To the best of our knowledge and belief and based on our good faith understanding of the statutory requirements, we have established a Comprehensive Compliance Program compliant with requirements of California Health and Safety Code §§ 119400-119402. We have developed this Comprehensive Compliance Program tailored to the size, organizational structure, and resources of the company, and implemented to meet the compliance goals set forth by the State of California. The description of our Comprehensive Compliance Program, provided on our website, reflects the plan we have implemented to comply with California law.

To our knowledge and belief, we are, in all material respects, in compliance with our Comprehensive Compliance Program as described, meaning that we have established the elements outlined, and where procedures are described, we have set up programs to initiate these procedures.

Qualifiers and Changes to the Comprehensive Compliance Program

QUALIFIERS

Please recognize, as government standards on compliance programs, including the U.S. Sentencing Guidelines and the HHS-OIG Guidance, recognize, that no program can completely prevent individual employees from improper conduct.

While we are not making a representation that every employee will always fully comply and while we cannot completely eliminate the possibility that an employee will violate these standards, the purpose of our Comprehensive Compliance Program is to help identify and deter potential violations and discipline employees as necessary.

We believe that our Comprehensive Compliance Program is reasonably designed to prevent and detect violations.

CHANGES TO THE COMPREHENSIVE COMPLIANCE PROGRAM

Compliance is a dynamic concept that must be adapted to the characteristics of particular businesses and changes to the legal environment. We therefore continue to review the Comprehensive Compliance Program to improve it, and it is possible (and likely) that we will do so and possibly make changes to the Comprehensive Compliance Program from time to time.

This declaration was made in June 2012, updated in May 2014, May 2016, May 2017, March 2018, January 2020, January 2021, January 2022, January 2023, and February 2026.
As noted, it is possible and likely that we will update our Comprehensive Compliance Program on an ongoing basis.

