

TITLE: Responsibilities of Compliance Personnel Policy	REFERENCE #: IGV-LEG-POL-0140
DEPARTMENT: Legal & Compliance	APPROVAL DATE: TBD
CATEGORY: Compliance	EFFECTIVE DATE: TBD
APPROVER: Marc Bonora	NEXT REVIEW DATE: TBD

1.0 Purpose and Scope

This policy defines the roles and responsibilities of the Compliance Department employees and ensure compliance with the Company’s Code of Conduct and policies, applicable laws, rules and regulations.

2.0 Sanctions & Enforcement

Failure to comply with this policy and its associated standards may subject the Ingenovis User to disciplinary action consistent with the severity of the incident, which may include, but not limited to:

- Loss of access privileges to information resources
- Termination of employment or engagement
- Other actions as deemed appropriate by the joint determination of Legal & Compliance, Human Resources, Security, and/or the applicable leadership team.

For Users such as contractors, consultants, and vendors, failure to comply with this policy may subject the group to the dismissal of consultants and/or cancellation of contracts based on a joint determination of the business unit or department that contracted the vendor or consultant, Legal & Compliance, and/or Human Resources teams.

3.0 Policy

<p>Policy Statement</p> <p>The Compliance Department is comprised of individuals with experience in preventing, detecting, and mitigating regulatory risk as it relates to applicable laws, regulations and policy. The Compliance Department may include the following positions: Chief Compliance Officer, Compliance Vice President, Directors, Managers, Generalists, Analysts and administrative personnel.</p> <p>The Compliance Department assumes the below listed responsibilities and to have open access to management and the Board of Directors as needed.</p>
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4.0 Standards

A. Chief Compliance Officer

The Chief Compliance Officer is responsible for the development, implementation and enforcement of the Company's Compliance Program. Specific responsibilities include:

- Ensure the Compliance program effectively prevents, detects and mitigates regulatory risks to the Company
- Oversee the development and implementation of training and education for employees regarding general compliance topics related to the Company's operations as well as the Company's Compliance Program
- Ensure employees are complying with the Company's Code of Conduct and policies and procedures under the Compliance Program
- Ensure that potential violations are promptly investigated and addressed
- Be available to discuss, confidentially, employee concerns regarding compliance with the law and the Company's operating policies and procedures
- Oversee both internal compliance reviews and reviews performed by third-party consultants

B. Compliance Personnel

Compliance personnel shall assist the Chief Compliance Officer in all tasks, including:

- Develop and implement compliance policies and procedures as needed
- Development, implementation and provision of training to all employees with respect to the Company's Compliance Program. Track and report on training completions
- Coordinate compliance monitoring and auditing activities and present findings to the Chief Compliance Officer who shall present applicable findings to the Executive and Board of Director Compliance Committees
- Maintain logs of inquiries and track and document findings of investigations and conclusions
- Coordinate and conduct compliance investigations
- Reporting to governmental agencies

- Oversee preparation of responses to carrier audit requests
- Develop and prepare reports on the status of compliance activities
- Regularly conduct reviews of the following and provide feedback from a Compliance perspective
 - Communications procedures
 - Operational procedures
 - Internal and/or external billing personnel
 - Excluded persons/entity screens
 - Fraud, waste and abuse issues
 - Laws and regulations impacting the healthcare industry
 - Other areas of potential non-compliance
- Conduct Exit Interviews with former employees, when appropriate
- Track, monitor and update management on new/revised federal, and state regulations that affect the healthcare industry
- Development and implementation of the annual compliance risk assessment and work plan
- All other tasks as directed by the Chief Compliance Officer

5.0 Revision History

Revision #	Date	Reviewer	Description of Changes
1.0	07/27/23	Jeff Lynch	Draft of new policy

6.0 Approval

Approver name	Marc Bonora
Approver title	General Counsel
Approver signature	<i>Marc Bonora</i>
Date	02/05/2025