

## MIMEDX STATEMENT OF COMPLIANCE WITH CALIFORNIA LAW

Effective December 1, 2024, to the best of our knowledge and based on our good faith understanding of the statutory provisions as they may apply to medical device and pharmaceutical product manufacturers, MIMEDX Group, Inc. ("MIMEDX") is in material compliance with the California Health and Safety Code §§ 119400-119402 requirements for Comprehensive Compliance Program ("CCP"), including satisfying the requirements of California Health and Safety Code §§ 119400-119402. The requirements of the CCP are encapsulated in MIMEDX' Healthcare and Regulatory Compliance Policy ("Policy").

To remain consistent with the Department of Health and Human Services Office of the Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers ("HHS-OIG Guidance"), MIMEDX adapted its Policy to the nature of its business as a manufacturer of medical devices and mixed products as defined under 21 CFR 4.2(e).

California Health and Safety Code §§ 119400-119402 dictates compliance with the Pharmaceutical Research and Manufacturers of America's Code on Interactions with Healthcare Professionals ("PhRMA Code"). As a manufacturer of medical devices, MIMEDX has also adopted policies and procedures consistent with the AdvaMed Code of Ethics on Interactions with Healthcare Professionals ("AdvaMed Code"). The spirit of AdvaMed Code is substantially similar to the spirit of PhRMA Code. However, there are certain non-conflicting significant differences applicable to the medical device industry.

MIMEDX' Policy contains annual spending limit for certain promotional activities directed toward healthcare professionals practicing in California ("Annual Spending Limit"). The Annual Spending Limit is set at \$5,000 per year for each applicable California healthcare professional. The Annual Spending Limit applies to gifts, promotional materials, and other items or activities that are provided to an individual California healthcare professional. In accordance with relevant law, the only exceptions to the Annual Spending Limit are: 1) the value of samples or evaluation product; 2) financial support for continuing medical education forums or health educational scholarships or fellowship grants; 3) payments made for legitimate professional services provided by a California healthcare professional, including reimbursement for reasonable expenses; 4) research grants; and 5) patient education materials and health-related items provided for the patient's benefit.

MIMEDX is committed to the highest practices of ethical and legal conduct. The Policy is designed to prevent and detect violations, and includes the following:

### **Written Standards.**

MIMEDX has established and implemented a Code of Conduct and Ethics that is consistent with relevant state and federal law as well as industry codes, including provisions of the PhRMA Code and the AdvaMed Code. The Policy also specifies MIMEDX' high ethical standards.

**Compliance Structure.**

MIMEDX maintains effective oversight over its compliance policies. Oversight includes the selection of a Compliance Officer to, via his/her designees, develop, operate, audit, and monitor compliance policies. Additionally, MIMEDX' compliance committee meets regularly to provide strategic direction and oversight.

**Communication.**

To encourage and maintain its open-door environment, MIMEDX upholds a corporate-wide confidentiality policy that contains a provision protecting employees against retaliation. MIMEDX' Policy also contains mechanisms to facilitate anonymous reporting.

**Training.**

All sales employees receive copies of our compliance policies, including MIMEDX' Code of Business Conduct and Ethics. Upon hire and annually thereafter, all employees must certify that they have read, understood, and agree to abide by these written standards. The policies are housed on a corporate website and are accessible to all employees. MIMEDX also provides ongoing comprehensive live training to those employees who regularly interact with healthcare professionals.

**Monitoring and Auditing.**

The Policy emphasizes our ongoing efforts to monitor, audit, and assess compliance processes.

**Enforcement and Corrective Action.**

MIMEDX investigates and appropriately responds to violations. MIMEDX takes all appropriate corrective action(s) to prevent violations from recurring, including correcting any gaps in our policies or procedures and maintaining a corporate-wide disciplinary policy.

To obtain a print version of our Policy or this declaration, please call Customer Support at 1-888.543.1917 and ask for Compliance.