

CURONIX

California Comprehensive Compliance Program

Curonix, LLC (“Curonix”) is committed to establishing and maintaining an effective compliance program in accordance with the Compliance Program Guidance published by the U.S. Department of Health and Human Services, Office of Inspector General¹(OIG Guidance). Further, the medical device industry has established and Curonix’s Compliance Program is designed in compliance with, the AdvaMed Code of Ethics on Interactions with Health Care Professionals (AdvaMed Code)². Curonix has tailored our Comprehensive Compliance Program (Compliance Program) to address the relevant risk areas and business activities of Curonix. We regularly review our Compliance Program to meet the evolving industry guidance and our company’s compliance needs.

Our Compliance Program established by our Board of Directors in conjunction with Curonix’s senior management is designed to prevent and detect violations of law and Curonix’s policies. However, as recognized by the OIG Guidance, the implementation of a Compliance Program cannot guarantee that improper conduct will be entirely eliminated. It is Curonix’s expectation that employees and our representatives will comply with our Code of Conduct (“the Code”), HCP Interactions Policy and the other policies established in support of the Code and our Compliance Program. In the event that Curonix becomes aware of potential violations of law or company policy, the company will investigate the matter and take relevant disciplinary action and implement corrective measures to prevent future violations.

As required by the California Health & Safety Code §119402(d) Curonix has implemented an annual promotional spending limit for modest meals, educational items, promotional items or activities that Curonix may provide to licensed California healthcare professionals. These promotional items and activities are also subject to restrictions set forth in our HCP Interactions Policy (consistent with the AdvaMed Code) and other Compliance Program policies and procedures.

Curonix 2024 Declaration of Compliance

Curonix hereby declares that to the best of its present knowledge and belief, it is in compliance with its Compliance Program and the relevant requirements of the California Health & Safety Code §§119400-119402.

Contact Information

For a copy of this Declaration or for more information regarding our Compliance Program, please contact our Chief Compliance Officer or Chief Legal Officer at 1.800.965.5134 or by sending an e-mail to machelle.shields@curonix.com or lori.sullivan@curonix.com

¹ Compliance Program Guidance for Pharmaceutical Manufacturers.

² The AdvaMed Code is generally aligned with the PhRMA Code.