

TITLE: Excluded Persons Policy	REFERENCE #: IGV-LEG-POL-0110
DEPARTMENT: Legal & Compliance	APPROVAL DATE: 02/05/2024
CATEGORY: Compliance	EFFECTIVE DATE: 02/05/2024
APPROVER: Marc Bonora	NEXT REVIEW DATE: 02/05/2025

1.0 Purpose and Scope

This policy applies to all Ingenovis Health, Inc. (“Ingenovis”) employees and its subsidiaries’ employees, Ingenovis affiliate employees, contractors, business associates, and third parties (staff members or ‘users’). This policy ensures that no such person is currently, or has been excluded from participation in a federal health care program which would result in contractual non-compliance or otherwise risk the ability of Ingenovis Health, Inc. (the “Company”) to do business with any entity or receive payment.

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

Policy Statement
<p>Definitions</p> <ul style="list-style-type: none"> A. “Ineligible Person” and “Ineligible Entity” is defined as a person or entity that is currently excluded, suspended, debarred, or otherwise ineligible to participate in federal healthcare programs. B. OIG = Office of Inspector General C. LEIE = List of Excluded Individuals/Entities D. SAM = System for Award Management

The Company will ensure all employees, contractors and vendors are screened against the OIG List of Excluded Individuals/Entities (LEIE), the General Services Administration System for Award Management (SAM), and state Medicaid list(s) of all states as part of the initial hiring process and monthly thereafter. The Company will neither employ nor contract with an entity that is currently or becomes excluded, suspended or debarred.

4.0 Standards

A. Initial Screening

1. All prospective employees, contractors and vendors will be screened against the LEIE, SAM and state Medicaid lists in which the employee's assignment is taking place during the initial hiring or contracting process through one of the following:
 - a. A complete background check;
 - b. Query of the National Practitioner Data Bank, if applicable;
 - c. Online search via
 - a. <https://exclusions.oig.hhs.gov/>
 - b. <https://www.sam.gov/SAM/>
 - c. streamlineverify.com
2. If a prospective employee, contractor or vendor is identified as an ineligible person or ineligible entity during the initial onboarding process, the Company will not consider employing or contracting with the ineligible person or ineligible entity until they have been reinstated into participation in the federal health care and/or state programs.

B. Monthly Screening

1. Screening of all current employees, contractors and vendors will be conducted by the Compliance Department at least monthly.
2. If a current employee, contractor or vendor becomes an ineligible person or ineligible entity after the initial screening and is not made compliant, the employee, contractor or vendor will be terminated and not eligible for rehire or contract renewal until they have been reinstated into participation in the federal health care or state programs.

C. Record Retention

1. The Company will retain screening results pursuant to the Record Retention Policy

--

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