

TITLE: Training & Education Policy	REFERENCE #: IGV-LEG-POL-0130
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 and standards apply to all Ingenovis Health, Inc. (“Ingenovis”) employees and its subsidiaries’ employees, Ingenovis affiliate employees, contractors, business associates, and third parties (staff members or ‘users’) with authorization to access Ingenovis systems or data.

The purpose of this policy is to define Ingenovis Health’s (“Company”) Compliance Program training and education requirements.

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>Definition</p> <p>A. “Onboarding Training” shall mean the training and education assigned and required to be completed following the employee’s date of hire.</p> <p>B. “Annual Training” shall mean the training and education assigned required to be completed each calendar year.</p>

All employees are required to complete compliance training following the date of hire and on an annual basis thereafter, as outlined below in section 4.0.

4.0 Standards

A. Onboarding Training

Each employee is required to complete the following compliance courses within 90 days of hire:

- a. General Compliance Training
- b. HIPAA Training
- c. Additional Training as Assigned

B. Annual Training

Employees will receive compliance training on an annual basis. The annual training schedule, timeline for completion and required courses will be developed by the Compliance Department and communicated to organizational leadership and employees.

C. Tracking

The SVP of Compliance, or other individual designated by the Chief Compliance Officer, will be responsible for ensuring all compliance training is completed in a timely manner by all employees.

5.0 Exceptions

New employees who have successfully completed the required Onboarding Training within six months preceding the annual (Company-wide) Training are eligible for an exemption. These employees will be exempted from completing the training again until the subsequent year's company-wide compliance training roll-out.

To qualify for the exemption, employees must have completed the necessary compliance training modules within six months leading to the announcement of the annual company-wide compliance training.

6.0 Revision History

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

7.0 Approval

Approver name	Marc Bonora
Approver title	General Counsel
Approver signature	<i>Marc Bonora</i>
Date	02/05/2024