

At AngioDynamics, we hold ourselves to the highest standards of business conduct. We comply with the many laws and regulations that affect our activities worldwide and we act in accordance with AngioDynamics' mission and values. We have established and are operating under a Comprehensive Compliance Program ("CCP") that is reasonably designed to prevent and detect violations.

The Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals (the "AdvaMed Code") recognizes that the medical device industry is significantly different than the pharmaceutical industry. Consistent with the United States Department of Health and Human Services Office of Inspector General (HHS-OIG) Guidance, we have tailored our CCP to the nature of our business as a medical device manufacturer.

California law refers to compliance with the PhRMA Code on Interactions with Healthcare Professionals. However, we manufacture medical devices rather than pharmaceutical products and have therefore formally adopted the AdvaMed Code, which is substantially similar to the PhRMA Code. We believe that adherence to the AdvaMed Code constitutes compliance with the PhRMA Code for purposes of satisfying the requirements of California law.

Based on our good faith understanding of the statutory requirements, we believe that we have established a comprehensive compliance program compliant with requirements of California Health and Safety Code §§ 119400-119402. We have developed our CCP tailored to the size, organizational structure, and resources of our company, and implemented to meet the compliance goals set forth by the State of California. A specific annual dollar limit has been imposed on promotional materials, items, or activities provided by AngioDynamics employees to California licensed health care professionals.

AngioDynamics has developed and distributes written compliance standards, procedures, and practices that guide the conduct of its employees. AngioDynamics has designated a Corporate Compliance Officer who reports to AngioDynamics' CEO and to its Board of Directors regularly on compliance issues, and AngioDynamics has established a management compliance committee to assist in continued implementation of its CCP.

AngioDynamics has developed and implemented regular, effective education and training programs for all relevant employees.

AngioDynamics has created and maintains an effective line of communication with its employees, including the availability of a Compliance Hotline (877-325-3781) for its employees to report complaints or ask questions. The Compliance Hotline is available 24 hours a day, 7 days a week. Calls to the Compliance Hotline cannot be traced and the system affords callers the opportunity to remain anonymous.

AngioDynamics utilizes audits and other risk evaluation techniques to monitor compliance, identify problem areas, and assist in the reduction of any identified problems.

AngioDynamics has implemented policies and procedures for the investigation of identified instances of noncompliance or misconduct, including directions regarding the prompt and proper response to detected offenses.

This declaration is made as of June 1, 2023. To our knowledge, in all material respects, AngioDynamics is in compliance with its CCP and the requirements of California Health & Safety Code §§ 119400-119402.

If you would like to receive a copy of this declaration, please send an email to: compliance@angiodynamics.com