

Ethics & Compliance

Capstone and its affiliated companies (collectively “Capstone”) are committed to conducting business in compliance with all applicable laws, rules, and regulations and the highest standards of ethical conduct. To this end, we have established, and will maintain, a comprehensive Compliance Program in accordance with the *OIG Compliance Program Guidance for Pharmaceutical Manufacturers* published by the Office of Inspector General, U.S. Department of Health and Human Services. Our Compliance Program is a key component of our commitment to adhering to the highest standards of corporate responsibility and fostering a culture of compliance that places a premium on doing business with integrity.

Through the Compliance Program, we can promote a culture of the highest ethics within the organization. It is Capstone’s expectation that employees will comply with our Code of Ethics and Conduct and its associated policies and procedures.

As recognized in the *OIG Guidance*, we have tailored our Compliance Program to fit the unique environment of our company. Moreover, we periodically review and enhance our Compliance Program to meet our evolving compliance needs.

Compliance Program Overview

Governance

Capstone has established an ethics and compliance organization with sufficient independence and experience with direct access to management and the Board of Directors. This includes a Compliance Officer and Compliance Committee that oversee the development, implementation, and ongoing oversight of the Compliance Program. Through period meetings, the Compliance Officer and Compliance Committee will initiate proactive risk management to identify and manage areas of risk and critical focus for the Compliance Program.

Colleen Roberts serves as the company’s Compliance Officer. She reports to the Chief Legal Officer and makes periodic reports to the Board of Directors.

Policies & Procedures

Capstone has established policies and procedures, including our Code of Ethics and Conduct, which articulates our fundamental principles and values and provides a framework for ethical conduct within our organization. The Code of Ethics and Conduct describes how we operate and provides guidance for ethical decision making. All Capstone colleagues are responsible for complying with our Code of Ethics and Conduct and to raise concerns when necessary.

Our Healthcare Interactions Policy provides guidance on ethical sales and marketing activity focused on improving patient care. This Policy incorporates common legal and ethical standards, including the



applicable provisions of the *PhRMA Code on Interactions with Healthcare Professionals*. It is Capstone's policy to not provide any item of value to any healthcare professional with the intent of influencing that healthcare professional's prescribing habits.

Training & Communication

A crucial element of our Compliance Program is the education and training of our employees on their legal and ethical obligations under applicable laws, rules, regulations, and company policies and procedures.

Capstone actively fosters dialogue between management and employees. Our goal is that all employees know to whom to turn when seeking answers to questions or reporting possible violations of company policies and understand that they can make such reports without fear of retaliation. To that end, we have adopted an open-door policy, as well as confidentiality and non-retaliation policies. We have a confidential, toll-free hotline to which individuals may anonymously report any concerns or suspected violations of applicable laws, rules, regulations, or Capstone policies or procedures.

Monitoring & Investigation

Capstone's Compliance Program includes monitoring and auditing to evaluate adherence to Capstone's policies and procedures. These activities are intended to detect issues that could lead to non-compliance, early identification of potential issues, remediation, prevention, and continuous improvement.

Capstone takes reports of known or suspected violations of company policies seriously and will respond promptly to investigate such matters and make a determination as to whether the facts substantiate the existence of a violation.

Where a substantiated violation has been confirmed, we will institute appropriate disciplinary action consistent with company policy to address violative conduct and to deter future violations. We will also work to determine the root cause of the violation and assess whether the violation is due to gaps in company policies and take appropriate corrective action designed to prevent future violations.

Declaration of Compliance for California

Capstone hereby declares, based upon its good faith understanding of the California Health and Safety Code §§ 119400-119402, that as of March 1, 2025, it has established a comprehensive Compliance Program that is in material compliance with the requirements thereof. This Declaration will be updated on an annual basis.

For purposes of compliance with the requirements of California Health and Safety Code §§ 119400-119402, Capstone has established an annual dollar limit related to certain appropriate items covered by California law that are provided to individual California healthcare professionals as part of Capstone's interaction with such healthcare professionals. Currently, the annual dollar limit is \$2,000 for promotional materials or other transfers of value. Examples of items that fall within this spending limit are occasional



modest meals in connection with informational presentations and educational items. This annual spending limit does not include payments to healthcare professionals for bona fide consulting or other services. In most instances the amount spent per individual will be substantially less than this annual limit.

Reporting HelpLine

Capstone colleagues may anonymously report suspected violations of law, policies or its Code of Ethics & Conduct to the Company Compliance HelpLine at 877-828-4800 or via email at <https://report.syntrio.com/capstonedevservices>.

