



workplace reporting whistleblower policy

(Reviewed/Ratified January 6, 2021)

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- CONFIDENTIAL -



Whistleblower Policy
PY-008 R01
Updated – January 6, 2021

Employee Complaint Procedures

Any employee of the Company may submit a good faith complaint regarding workplace violations or concerns, including accounting and auditing matters, to the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance on an anonymous basis with all applicable laws and regulations, accounting standards, accounting controls, and audit practices. The Company's Audit Committee will oversee treatment of employee concerns.

In order to facilitate the reporting of employee complaints, the Company's Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints and (2) the confidential, anonymous submission by employees of concerns regarding questionable matters.

Scope of Matters Covered by these Procedures

These procedures relate to employee complaints or concerns relating to any questionable matter, including, without limitation, the following:

- Fraudulent or negligent accounting
- False financial reporting
- Insider trading
- Conflicts of interest
- Breaches of confidentiality
- Violations of antitrust laws
- Violations of international, federal, state or local regulations
- Inappropriate gifts or entertainment
- Bribes or kickbacks
- Harassment or discrimination
- Safety or security hazards
- Research misconduct
- Other violations of company policies or criminal conduct

Receipt of Employee Complaints

Employees with concerns or complaints may report these matters to the Audit Committee and Company, on a confidential or anonymous basis, through the following third-party maintained platforms:

Website: axogeninc.ethicspoint.com

Toll-free hotline number: 1-844-989-2990

All calls are received and maintained by a third-party group, who then submits reports to the General Counsel and Chief Compliance Officer and the Chair of the Audit Committee. In the event that any of the individuals serving in these rolls is named in the call, the report will then be forwarded by the third-party group to another officer of the company. Summary reports will be provided to the Board on a quarterly basis.



Treatment of Complaints

When a concern or complaint is received, the third-party group assigns and provides to the caller, a unique control number and PIN code, to be used by the employee, who submits the complaint, to call and obtain information or status of their complaint. The Company will acknowledge receipt of the complaint, submit any questions, and detail any actions taken, to the third-party group. When the caller places a follow-up call, the third party will then transfer this information to the caller, provided they have retained their control number and PIN. The third-party group maintains a history on all activities and correspondence related to each complaint. It is the Company's responsibility to fully investigate all complaints and inform the Audit Committee and Board of Directors of the details and resolutions of such complaints.