

# **INOGEN, INC.**

## **Political Contributions, Public Policy, and Lobbying Activities Policy**

Originally adopted and approved on April 29, 2020

Inogen, Inc. and all subsidiaries (“Inogen”) encourages the advancement of sound public policy that supports our mission to provide freedom and independence to respiratory therapy patients through innovative products and services.

### **Political Contributions**

Federal law prohibits corporations from making political contributions to federal candidates or party committees, but corporations may establish political action committees (PAC) funded solely through voluntary employee contributions. Some jurisdictions permit corporate contributions to state and local candidates. Inogen has not established a PAC and does not plan to create one in the foreseeable future. Inogen does not allow contributions to state or local candidates or party committees as a matter of practice, even through these are allowed in some jurisdictions.

It is Inogen’s policy to comply fully with all local, state, federal, foreign and other applicable laws, rules and regulations regarding political contributions. Inogen’s funds or assets must not be used for, or be contributed to, political campaigns or political practices under any circumstances without the prior approval of Inogen’s Chief Financial Officer.

In 2019, Inogen paid \$0 in political contributions.

### **Public Policy & Lobbying Activities**

Inogen may engage in legal lobbying activities to address public policy concerns for respiratory therapy patients, Medicare policies, and Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) policies, including the competitive bidding program. Inogen believes in certain cases lobbying can provide decision-makers with valuable insights and data, as well as grant stakeholders access to the development and implementation of public policies. In 2019, Inogen paid \$0 in lobbying fees.

It is Inogen’s policy to comply fully with all local, state, federal, foreign and other applicable laws, rules and regulations regarding lobbying. Inogen’s funds or assets must not be used for, or be contributed to, lobbying under any circumstances without the prior approval of Inogen’s Chief Financial Officer. Inogen’s Chief Financial Officer will confirm lobbyist activities are appropriate, align with Inogen’s mission and goals, and in compliance with all regulations.

Inogen does participate in some trade associations to support the home medical equipment provider industry. The American Association of Homecare (AAH) and the National Association for Medical Direction of Respiratory Care (NAMDRC) are the only trade associations of which

Inogen is a member. NAMDRRC is in the process of merging with CHEST / American College of Chest Physicians. Inogen pays its membership dues with corporate funds.

### **Employee Political Activity**

Inogen also encourages our employees to be active in civic and community activities, including participation in political and democratic processes. All political, lobbying and civic activity by its employees must comply with applicable laws and Inogen's Code of Ethics and Conduct and such participation must not include:

1. dedicating regular working time to political purposes;
2. making unauthorized use of Company resources (e.g., money, equipment, facilities, property, etc.) for political purposes.