

INOGEN, INC.

Responsible Sales and Marketing Policy

Originally adopted and approved April 29, 2020

Inogen, Inc. and all subsidiaries (“Inogen”) is committed to responsible, ethical and patient-centric sales and marketing practices for our products that meet the standards set by both our internal Code of Ethics and Conduct and external regulations and codes of practices, in particular:

- all laws and regulations dealing with healthcare marketing practices;
- all applicable global, regional and local industry codes relevant for our business;
- privacy of customer and consumer information and data protection; and
- recommendation and promotion only of lawful uses, e.g. no off-label.

We aspire to provide the highest level of integrity in our sales and marketing practices by adhering to all laws and guidelines of the Federal Trade Commission and other relevant governing bodies, marketing information in a responsible and truthful manner, and communicating with customers and healthcare professionals with transparency, clarity and truthfulness. That means communicating the benefits, performance, and attributes of our products accurately and directly, with claims that are substantiated. Our marketing communications are clearly distinguishable as such and all advertising undergoes internal review for accuracy and compliance.

In addition, we are committed to the implementation and monitoring of procedures, systems, and processes in particular:

- Assess risks: follow internal guidelines for promotional communications including review of marketing business programming to assure the compliance with external regulations;
- Prevent: regularly train employees to help understand the laws and regulations as well as internal rules; and
- Act: corrective actions where required and adapt marketing to the extent required by risk assessments or changes in external regulations.

We believe that our direct-to-consumer “DTC” sales and advertising contributes to greater awareness and education for our customers and access to our products which can benefit public health by increasing the number of patients properly treated. We require our employees to follow industry guidelines on advertising and comply with local laws and regulations for all our DTC sales and advertising programs.