



## **A Message from Our President and CEO:**

Apyx Medical Corporation (“Apyx”) is a company that is committed to the highest standards of compliance. We will always do the right thing for our healthcare professionals, customers, patients, and stockholders. Under no circumstances will we compromise our values to make a sale. We will always use good judgment and will remember that our company is successful because we commit every day to remaining a leader in our field through our ethical and compliant behavior.

Working together, we must continue to serve our industry, healthcare community, patients, customers, and stockholders in a fair and honest manner. This is my promise and my commitment to you, as we work to build our future based on the highest ethical standards.

Thank you for all that you do to make Apyx a great company.

A handwritten signature in black ink, appearing to read "Charlie Goodwin", enclosed within a hand-drawn oval.

Charlie Goodwin  
President and Chief Executive Officer  
Apyx Medical Corporation

## Compliance Program Overview

### **Our Commitment to Compliance**

Apyx Medical Corporation's ("Apyx Medical" or "the Company") Compliance program is designed to follow applicable government guidelines and industry standards.

### **Our Compliance Framework**

#### **Designating a Compliance Officer and Compliance Committee:**

Our Chief Financial Officer ("CFO") also serves as the Company's Chief Compliance Officer ("CCO"). In this capacity, this individual is responsible for providing updates to both the Apyx Medical Audit Committee, as well as the Regulatory Compliance Committee ("RCC"). As it relates to compliance, the CCO is responsible for creating, operating, monitoring and auditing the Company's Compliance Program. The RCC shall meet as frequently as necessary to meet the compliance needs of the company, but no fewer than quarterly, each year.

#### **Implementing Written Policies and Procedures:**

Apyx Medical has created this compliance program to reinforce ethical and compliant behavior within the company and to foster a work environment that is transparent, honest and fair.

#### **Developing Effective Lines of Communication:**

There are multiple lines of communication for employees to raise concerns, report violations, or ask questions without fear of retaliation or retribution.

#### **Conducting Effective Training and Education:**

For covered employees, distributors, and other applicable business partners (i.e., our joint venture in China), we require training on the policies and procedures included in this program and provide access to this policy document, which is also available on our Company website.

#### **Enforcing Standards Through Disciplinary Guidelines:**

We communicate to all employees, distributors, and other key business partners our mission, values, and compliance requirements. These documents are also provided as a reference to all covered parties. If it is determined that a violation has occurred, we are committed to taking the appropriate disciplinary actions.

#### **Responding Promptly to Possible Issues:**

We report the outcomes of all monitoring, audits, and investigations of identified violations to the CCO, RCC, and other applicable stakeholders. This would include detailed information around any findings, as well as the action items taken to remediate them.



## **Reporting Compliance Violations**

We are committed to fostering an environment of open communication and encourage questions or concerns to be raised regarding ethics and compliance. This includes reporting concerns of suspected or actual compliance violations.

All questions regarding compliance issues, or other ethics matters, should be discussed with your supervisor, Human Resources, the CCO, or other leadership within the company.

If you witness a suspected or actual compliance or ethical violation, report the issue as soon as possible to your supervisor, Human Resources, the CCO or other leadership within the company.

If for some reason you are not comfortable directly approaching those individuals, or would prefer to remain anonymous, you may call our global, independent 3<sup>rd</sup> party compliance hotline at 1-844-420-0044 (Lighthouse Services) or via website at [www.lighthouse-services.com/apyxmedical](http://www.lighthouse-services.com/apyxmedical). Reasonable efforts will be made to conduct the investigation in a timely manner that protects confidentiality and anonymity.

## **Our Non-Retaliation Policy**

We prohibit retaliation or retribution against anyone who reports or makes a good faith effort to report suspected misconduct or improper behavior. Disciplinary action will be taken against any individuals who engage in this behavior. If you believe your supervisor has not taken appropriate action, or if you believe you are facing retaliation for voicing a concern, you should contact your supervisor, Human Resources, the CCO, or other leadership within the Company.