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Radius Health, Inc.

California Comprehensive Compliance Program Declaration

(As required by the California Health & Safety Code section §§119400-119402)

Radius Health, Inc. Healthcare Compliance Program

Radius Health, Inc. (Radius or the company) is focused on addressing unmet medical needs in the area of bone health and is dedicated to improving the lives of patients, their families, and their caregivers. Radius is committed to conducting its business activities with integrity and in compliance with applicable laws, regulations, industry codes of conduct, and Radius's Healthcare Compliance Program. Radius's compliance policies are intended to further this commitment by providing an overview of the laws, regulations, and Radius policies and guidelines that govern Radius's business practices.

To conduct our business with integrity and ethics, Radius has established a Healthcare Compliance Program, which serves as a Comprehensive Compliance Program (CCP) Nationwide. This program has been developed in accordance with the laws applicable to our industry, the "Program Guidance for Pharmaceutical Manufacturers" published by the Office of the Inspector General of the U.S. Department of Health and Human Services and the Code of Interactions with Healthcare Professionals of the Pharmaceutical Research and Manufacturers of America (PhRMA).

Consistent with the OIG Guidance Radius's compliance program includes:

Compliance Leadership

Radius has a Compliance Officer who is responsible for overseeing Radius's Healthcare Compliance Program, including responsibilities for developing, operating, and monitoring the compliance program. The Compliance Officer reports on a regular basis to the SVP of Legal and General Counsel of Radius Health, Inc.

Radius has also established an Executive Compliance Committee to provide oversight and support to the ongoing implementation and maintenance of the Healthcare Compliance Program.

Written Standards

Radius has adopted compliance policies that guide the company's day-to-day operations and set forth the expectations for all subject employees and agents of the company, including policies that govern Radius employee interactions with healthcare professionals in accordance with the U.S. Department of Health and Human Services Office of Inspector General's Compliance Program Guidance for Pharmaceutical

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Manufacturers ("OIG Compliance Program Guidance") and the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals ("PhRMA Code").

Annual Spend Limit for California-Licensed Healthcare Professionals

Radius has adopted policies and procedures that help ensure that the company operates in accordance with the OIG Compliance Program Guidance and the PhRMA Code guidelines. Radius has also established a total annual dollar limit on items of value (including meals) and activities that Radius may provide to a California-licensed Healthcare Professional in accordance with Section 119402 of the California Health & Safety Code. Radius's established annual aggregate limit per California Healthcare Professional is \$2,500.00, which applies to Radius as a company. This annual limit may be revised by Radius from time to time.

The following are exempt from counting towards Radius's annual aggregate dollar limit:

- Drug samples given to Healthcare Professionals for free distribution to patients;
- Financial support for CME programs;
- Financial support for health educational scholarships; and
- Fair market value payments provided for a Healthcare Professional's professional services (e.g., consulting activities).

Education and Training

Radius is committed to effectively educating and training its employees, managers, officers, and agents, including the sales and marketing staff, on the Company's marketing Code of Conduct and related compliance policies. New employees receive training as part of their initial onboarding, and existing employees receive compliance training on at least an annual basis. Radius also periodically reviews and updates its training programs to identify any potential new areas for training and to ensure the program aligns with Radius's compliance policies.

Effective Lines of Communication

Radius maintains an open line of communication between the Compliance Department and all Radius employees. Radius expects employees, agents, and vendors who do business with the company to report concerns over possible misconduct, potential conflicts, or known violations of the compliance policies and/or other company policies and procedures to their supervisors, managers, or to the Compliance Department.



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Radius employees may contact the Compliance Department directly by any of the following methods:

- Email: compliance@radiuspharm.com
- Phone: 1-617-551-4000
- Mail: 22 Boston Wharf Rd 7th floor, Boston, MA 02210

Radius has established an anonymous system, the Radius Helpline, to receive employee complaints and provide advice or information on questions anonymously. The Helpline can be reached at radiushealth.ethics.com or 1-855-801-8204.

We also encourage our employees, officers, and agents to ask questions about any activity where they are unclear about a potential violation or application of our Compliance Program. Questions may be addressed through any of the established channels described above.

Radius has also adopted procedures to protect the anonymity of complainants and to protect whistleblowers from retaliation. Radius does not permit acts of retaliation or retribution against an employee or officer who, in good faith, reports a potential, suspected, planned, or actual violation or application of Radius's compliance policies, and any such actions will be dealt with appropriately.

Auditing and Monitoring

Radius's Compliance Department is responsible for developing and implementing an effective plan for monitoring and auditing compliance with company policies, guidelines, and practices. Through these audits, the Compliance Department can identify potential or existing problems or areas of concern and take corrective action in an effort to prevent the recurrence of non-compliance as needed. The nature of these audits and reviews, the extent of the audits, and the frequency with which the Compliance Department performs such audits vary due to a variety of factors, including new regulatory requirements, changes in company practices, and other relevant considerations.

Enforcing Standards through Well-Publicized Disciplinary Guidelines

Radius's compliance policies and procedures put employees and agents, including management, on notice that noncompliance will have disciplinary consequences, up to and including termination of employment.

Responding to Potential Violations and Corrective Action Procedures

Radius's Compliance Department oversees the review and investigation of noncompliance reports and/or allegations and suspected cases of misconduct brought to the Compliance Department's attention.

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Radius is committed to taking steps to correct misconduct, which may include administering discipline, up to and including dismissal, where necessary. Radius's Compliance Officer oversees the implementation of corrective measures in response to findings of noncompliance, such as retraining, increased monitoring, and warnings.

CALIFORNIA 2023 ANNUAL DECLARATION OF COMPLIANCE

Radius, Inc. hereby confirms that it has implemented a compliance program that adheres to California Health & Safety Code sections 119400 and 119402.

This compliance program is consistent with the OIG Compliance Program Guidance and PhRMA Code guidelines and includes an annual limit for certain items and activities provided to Healthcare Professionals covered by California law.

As of the date of this declaration, we believe that Radius is in full compliance with our compliance policies and California requirements in all material respects.

As of December 31 2023, to the best of our knowledge, Radius is in material compliance with its Comprehensive Compliance Program and the requirements of the California Health & Safety Code §§ 119400-119402.

It is our expectation that all employees and contractors will comply with the Comprehensive Compliance Program and all policies that support it. We are committed to ensuring ongoing compliance with the CCP, which has been designed to prevent, detect, and address potential or actual instances of non-compliance.

To obtain a copy of this declaration and certification, please reach out to <u>compliance@radiuspharm.com</u>.