



California Comprehensive Compliance Program Declaration

Effective Date: July 1, 2024

Introduction:

X4 Pharmaceuticals, Inc. (“X4”) is committed to conducting business in accordance with the highest standards of ethics and compliance. We consider our reputation for ethical behavior to be a valuable corporate asset. As such, we have established a Comprehensive Compliance Program (CCP) in accordance with California Health and Safety Codes §§119400-119402, the Compliance Program Guidance for Pharmaceutical Manufacturers published by the Office of Inspector General, U.S. Department of Health and Human Services (OIG), and the Pharmaceutical Research and Manufacturers of America (PhRMA) “Code on Interactions with Health Care Professionals.”

Our Comprehensive Compliance Program:

Our CCP is tailored to X4's size, organizational structure, and the nature of our business as a pharmaceutical manufacturer. It is designed to ensure compliance with applicable laws, rules, and regulations. Key components of our CCP include:

- **Leadership and Structure:**
 - The Vice President, General Counsel and Chief Compliance Officer is charged with developing, operating and monitoring the CCP. This individual reports on the status of the compliance program to the X4 Board of Directors. This individual also chairs the Healthcare Compliance Committee, which provides leadership and support for X4’s CCP across the organization.
- **Written Standards:**
 - In addition to a Code of Business Conduct, X4 maintains policies and procedures to establish compliance standards across various business processes. These policies have been developed under the oversight of the Chief Compliance Officer and are inclusive of any regulation regarding limits on gifts, meals or remuneration. Our written standards address key areas of potential risk that are identified via industry codes, laws, and X4’s auditing and monitoring efforts.
- **Education and Training:**
 - X4 trains representatives annually and periodically throughout the year on X4 written standards, and any applicable laws, rules and regulations. The training is made up of both modules based digital training and live training programs. Training documents are maintained in our learning management system. X4 also provides regular updates and “refresher training” on compliance matters on an as-needed basis.

- **Internal Lines of Communication:**
 - X4 encourages open communication and maintains a non-retaliation policy in reporting compliance concerns. X4's whistleblower hotline information is posted in the office and via X4's intranet site, and is available 24 hours-a-day, seven days a week to employees to report instances of potential or actual non-compliance for investigation.
- **Auditing and Monitoring:**
 - X4 monitors and audits activities regularly to determine compliance with written standards. The areas included in auditing and monitoring are reviewed and updated to reflect emerging business activities, compliance risks and new regulatory requirements, among other considerations. X4 addresses any findings of non-compliance as required.
- **Responding to Potential Violations:**
 - X4 maintains an Investigations & Disciplinary Actions Policy. X4 may investigate any suspected non-compliance with its Code of Conduct, policies and procedures as well as all applicable laws and regulations to establish the facts of the situation and determine whether prohibited conduct occurred.
- **Corrective Action:**
 - Should a compliance violation be detected via an investigation or other means, X4 ensures that appropriate corrective action and additional preventative measures are implemented as required.

Annual Declaration of Compliance: X4 hereby declares that, to the best of our knowledge and based on a good faith understanding of the statutory requirements, we have implemented a Comprehensive Compliance Program that is compliant with the requirements of California Health and Safety Code §§ 119400-119402, and that we are in compliance with our Comprehensive Compliance Program and the OIG Guidance.

A copy of this Declaration may be obtained by contacting X4 at (857) 529-8300.