

InfuSystem Holdings, Inc.

Whistleblower Policy

- I. InfuSystem Holdings, Inc. ("Company") has established the following procedures to receive, investigate and act on complaints and concerns of employees, shareholders, customers and other stakeholders regarding violations of the Company's Code of Ethics and of the Company's accounting practices ("Complaints")
- II. Procedures for Receiving and Investigating Complaints
 - A. The Internal Audit Manager is authorized to receive Complaints. In this capacity, the Internal Audit Manager acts under the authority of the Audit Committee.
 - B. Complaints may be made as follows:
 1. In writing to the attention of the Internal Audit Manager.
 2. For those who wish to protect their anonymity and the confidentiality of their communications, you may call the Hotline at 888-255-8148. This toll-free number is staffed by The Network, an independent organization operating 24 hours a day, 7 days a week. Once you call this number, you will be given a PIN designed to protect your identity and the confidentiality of your Complaint throughout the Complaint handling process.
 3. Complaints may be made to raise a concern or to report a concern previously raised but that he/she feels has not been appropriately handled.
 - C. Accounting Complaints may also be made directly to the Chairman of the Audit Committee. The Chairman may, in his/her discretion, return the Complaint to the Internal Audit Manager for docketing and investigation in accordance with paragraphs D-F below, or retain the matter for investigation by the Audit Committee in accordance with Paragraph H below.
 - D. The Internal Audit Manager will prepare a written docket ("Docket") of all Complaints summarizing in reasonable detail for each complaint: the nature of the Complaint; the date of receipt of the Complaint; the current status of any investigation into the Complaint; and any final resolution of the Complaint. The Internal Audit Manager will distribute an update of the Docket to the Chairman in advance of each regularly scheduled Audit Committee meeting.
 - E. In the event the Complaint involves or implicates the Internal Audit Manager, the Internal Audit Manager will promptly recuse himself or herself from the investigation and inform the Audit Committee in writing. The Audit Committee will thereafter promptly appoint an impartial party to investigate the Complaint and report to the Audit Committee consistent with this policy.
 - F. Promptly upon receipt, the Internal Audit Manager will investigate and report ("Investigation Report") the results to the Audit Committee. Investigation Reports will be prepared in reasonable detail and shall be in addition to the information provided to

the Audit Committee on the Docket. The Internal Audit Manager is authorized in his/her discretion to engage outside auditors, counsel or other experts to assist in the investigation. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate the review of the investigation materials or otherwise by law. The parameters of any investigation will be determined by the Internal Audit Manager in consultation with the Audit Committee.

- G. The Audit Committee will review the Docket and any Investigation Reports submitted by the Internal Audit Manager. The Audit Committee will have the authority to direct that the appropriate corrective action be taken by the Company in response to any Complaint. The Audit Committee may, in its discretion, consult with any member of the Company's management who may have appropriate expertise to assist in the evaluation of the Complaint. The Audit Committee is authorized in its discretion to engage outside auditors, counsel or other experts to assist in the evaluation of any results of any investigation into a Complaint.
 - H. At any time, the Audit Committee may, in its discretion, determine that it, and not the Internal Audit Manager, should initiate and/or assume the investigation of any Complaint. In this case, the Audit Committee will promptly determine what professional assistance, if any, it needs in order to conduct the investigation.
- III. Protection of Whistleblowers
- Consistent with the policies of the Company and applicable law, the Audit Committee and the Company's management will not retaliate or attempt to retaliate, and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes a Complaint or provides assistance or information to the Audit Committee, the Internal Audit Manager, the Company's management or any other person or group, including any government, regulatory or law enforcement body, investigating or otherwise helping to resolve a Complaint.
- IV. Confidential and Anonymous Reports by Employees
- Employees of the Company are expressly authorized to make Complaints using the procedures described above in Section II B(2) on a confidential or anonymous basis. All Complaints received from employees will be treated confidentially or anonymously, as applicable, to the extent reasonable and practicable under the circumstances.
- V. Publication of Procedures
- The Company will cause these procedures to be communicated to all employees at least twice a year and posted externally on the Company's website.