

## **STATE OF CALIFORNIA COMPREHENSIVE COMPLIANCE PROGRAM**

Adopted in accordance with California law, this Comprehensive Compliance Program (“Compliance Program,”) reflects the commitment of ClearPoint Neuro, Inc. (“ClearPoint Neuro” or “Company”) to the highest ethical standards and responsible decision-making in its interactions with healthcare professionals. ClearPoint Neuro believes that adherence to all applicable laws, regulations, and industry standards are critical to the Company’s operations and success. The Compliance Program is designed to prevent and detect violations of applicable law, compliance standards, and other Company policies. ClearPoint Neuro has tailored its Compliance Program to the nature of its business as a medical device manufacturer, including its expansion into new product areas and therapies.

### **WRITTEN STANDARDS**

ClearPoint Neuro has adopted a Policy and Procedure for Interactions with Healthcare Providers (the “Policy”). The principles in the Policy are based on legal requirements and applicable guidance, including industry guidance (e.g., the AdvaMed Code of Ethics on Interactions with Health Care Professionals) and guidance from the U.S. Department of Health & Human Services Office of Inspector General. The term "Healthcare Providers" includes all individuals and entities licensed to provide health care to patients, or otherwise in a position to recommend or arrange for the purchase or use of Company products.

In response to California Health & Safety Code §§119400 et seq., ClearPoint Neuro has established an annual spending limit of \$3,000 for gifts, promotional materials, items or activities directed toward "individual medical and healthcare professionals" in California.

### **COMPLIANCE OFFICER**

ClearPoint Neuro has appointed a Compliance Officer who is responsible for providing interpretive guidance in applying the Policy and related policies to specific situations and for generally overseeing implementation and enforcement of the Compliance Program. The Compliance Officer and/or his/her designee(s) conduct and/or monitor investigations into alleged violations of law and/or Company policies or procedures. As a result of these investigations, the Compliance Officer, and others as appropriate, determines appropriate corrective, preventative and/or disciplinary actions to be taken and monitors to ensure that such actions are taken.

### **TRAINING & EDUCATION**

ClearPoint Neuro recognizes that training and education are key parts of an effective compliance program. Employees who interact directly or indirectly with Healthcare Providers receive training on the Policy. Additional ethics and compliance education and training programs are provided on an ongoing basis as required by an individual's job responsibilities and by changes in the laws and Company policies and procedures. Training records are maintained in accordance with Company policy.

## **REPORTING VIOLATIONS OF THE COMPLIANCE PROGRAM**

Employees, customers, suppliers and others are encouraged to contact the Compliance Officer with questions or concerns. Concerns may also be reported anonymously in accordance with the procedure set forth in the ClearPoint Neuro Compliance Reporting Policy.

Employees may also ask questions of, or report concerns to, supervisors and other members of management. There will be no retaliation against anyone who has reported a suspected violation or concern in good faith. The Company encourages anyone who reports information to identify themselves when making such a report in order to facilitate investigation of the possible violations (subject to compliance with local laws), but reports may also be made anonymously.

## **CORRECTIVE OR PREVENTATIVE ACTION**

The Compliance Program is designed to prevent and detect conduct that may be inconsistent with the requirements of applicable law or regulations or the Policy. If improper conduct is detected, ClearPoint Neuro will address it promptly and responsibly with corrective action including, but not limited to, appropriate disciplinary measures. The Company will assess whether violations of the Compliance Program, including the Policy, are a result of gaps in policies, practices, training, internal controls or individual acts, and will take action to prevent future violations.

## **MONITORING AND PERIODIC REVIEW**

The Compliance Officer and/or the Compliance Officer's designee(s) will monitor the implementation and administration of the Compliance Program, including monitoring the activities of sales and marketing personnel. As part of that oversight, the Compliance Officer and/or his/her designee(s) will review Company operations and industry developments, to identify new and emerging risk factors for the Company in its relationships with Healthcare Providers. The Compliance Officer and/or his/her designee(s) will report on a regular basis to the Board of Directors as to the status of the Compliance Program, including its implementation and an assessment of its effectiveness and areas that may need improvement.

## **COPIES OF COMPLIANCE PROGRAM**

Copies of this Compliance Program, the Code of Conduct, and ClearPoint Neuro's Annual Declaration of Compliance can be obtained by calling ClearPoint Neuro's toll-free number at (888) 287-9109.

## **ANNUAL DECLARATION OF COMPLIANCE**

As required by the California Health & Safety Code §119402(e), ClearPoint Neuro, Inc. hereby declares that, to the best of its knowledge, it is in all material respects in compliance with its Comprehensive Compliance Program and the relevant requirements of California Health & Safety Code §§ 119400-119402.

*ClearPoint Neuro, Inc., March 15, 2023*