

CERIBELL, INC.

Third-Party Code of Conduct

At Ceribell, our mission is to become the standard of care for the detection and management of seizures in the acute care setting, and to expand the clinical application of our system and AI algorithms in the acute care setting and beyond.

We carefully choose our vendors and suppliers (“Third-Party Partners”) based on their commitment to the same principles that guide our business: integrity, quality, and accountability. We expect our partners to uphold these values in every aspect of their work on our behalf.

By collaborating with Third-Party Partners who share our standards and dedication to excellence, we strengthen our ability to deliver safe, effective solutions that improve patient outcomes.

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Code of Conduct

Antibribery and Anticorruption

Ceribell expects all third-party vendors and suppliers (“Third-Party Partners”) to maintain effective measures to prevent bribery and corruption. Bribery refers to offering or receiving anything of value to gain improper business benefits, while corruption involves misuse of authority for personal advantage. Both bribery and corruption are illegal and violate Ceribell’s ethical principles.

Third-Party Partners are required to:

- Educate their personnel and any subcontractors involved in Ceribell work about anti-bribery, anti-corruption, and relevant global regulations.
- Not offer, give, solicit, or accept bribes or anything that could be perceived as such, either directly or indirectly.
- Conduct appropriate due diligence on any individuals or entities engaged to perform services for Ceribell, and periodically monitor their compliance with anti-bribery and anti-corruption obligations.
- Maintain accurate, complete, and transparent financial and business records related to work performed for Ceribell, and provide access to these records upon request.
- Limit payments, gifts, hospitality, and other benefits to those specifically permitted under the contract with Ceribell. Cash or cash equivalents, facilitation payments, political contributions, and unauthorized gifts are strictly prohibited.

Conflicts of Interest

Ceribell employees are required to act in Ceribell’s best interests, and we expect our Third-Party Partners to support this standard. Third-Party Partners must avoid any situation that could unduly influence Ceribell employees’ business judgment. Any personal or family relationships with Ceribell employees, or other potential conflicts of interest, must be disclosed promptly.

Trade Compliance

Third-Party Partners must adhere to all applicable laws and regulations governing imports, exports, trade sanctions, embargoes, and related restrictions in the jurisdictions where they operate or provide services to Ceribell.

Confidentiality

Third-Party Partners must protect Ceribell confidential information as if it were their own and ensure any communication of confidential information is authorized, limited to those who need to know, and confidentiality agreements have been executed as necessary. Confidential information includes, but is not limited to, intellectual property of Ceribell, strategic information, and stock market sensitive data. You should not speak about Ceribell to the media or in any public forum without Ceribell's consent.

Data Privacy

You must comply with relevant data privacy and security laws (i.e., EU GDPR, HIPAA, etc.), protect personal data and honor the rights of data subjects. This includes applying effective technological and physical security measures to ensure the confidentiality, integrity, and availability of personal data, appointing an individual to be accountable for data privacy and security, and providing training to employees who may access Ceribell personal data on the proper handling and protection of the data. The privacy and security practices of any parties you contract to perform services to or on behalf of Ceribell must be thoroughly reviewed to ensure adequacy.

Human Rights and Labor Practices

Ceribell cares deeply about appropriate treatment of individuals and expects you to share the same deep commitments. We expect you to maintain a workplace free from discrimination or harassment (including sexual harassment) because of any category or status protected under applicable law. Further, Third-Party Partners must never engage in slavery, human trafficking, or child labor. Diversity and inclusion of different cultures and backgrounds is core to Ceribell's values and success. We expect our Third-Party Partners to be inclusive in the selection of their workforce force, suppliers, and service providers.

Animal Welfare

Animals should be treated with care, including the minimization of pain and stress. Animal testing should be performed after consideration to replace animals, reduce the numbers of animals used, or refine procedures to minimize distress. Alternatives should be used whenever scientifically valid and acceptable to regulators.

Raising Concerns

Ceribell expects you to encourage your workforce to bring any concerns, deviations from this Code, or potential violations of law to our attention as soon as possible. You and your workforce can report issues or concerns via Ceribell's Compliance Hotline by calling 855-387-4431 or by submitting a report at <https://www.ceribellcompliance.com/>.

Best Practices

Ethical Conduct

Ceribell expects all Third-Party Partners to uphold high ethical standards in every aspect of their operations and interactions. Integrity, fairness, and accountability should guide decision-making and business conduct at all times.

Sustainable Sourcing and Supply Chain Transparency

Third-Party Partners must obtain materials in a responsible and ethical manner, performing due diligence on the origins of key raw materials to ensure legal and sustainable sourcing practices. Partners should evaluate whether any portion of their supply chain related to Ceribell's products involves conflict minerals, such as tantalum, tin, tungsten, or gold, and take appropriate steps to comply with applicable laws and reporting obligations.

Cooperation with Government Agencies

When legally required, Third-Party Partners must cooperate with lawful investigations or audits conducted by government agencies responsible for enforcing compliance obligations. Such cooperation may include, where permissible, granting reasonable access to facilities, documentation, and personnel. If a partner becomes aware of credible evidence that any worker, contractor, or subcontractor has violated local laws, it must promptly notify the relevant authorities, consistent with applicable legal requirements.

Clinical Research Compliance

Third-Party Partners responsible for manufacturing, supplying, testing, packaging, storing, or distributing materials or products on Ceribell's behalf must comply with all relevant quality and safety standards. This includes adherence to Good Manufacturing Practice (GMP) and Good Laboratory Practice (GLP) requirements applicable to the markets where Ceribell's products are registered, manufactured, or distributed.

Product Quality and Compliance

Third-Party Partners responsible for manufacturing, supplying, testing, packaging, storing, or distributing materials or products on Ceribell's behalf must comply with all relevant quality and safety standards. This includes adherence to Good Manufacturing Practice (GMP) and Good Laboratory Practice (GLP) requirements applicable to the markets where Ceribell's products are registered, manufactured, or distributed.

Pre-Employment Screening

Any Third-Party Partner hiring individuals who will have access to Ceribell information, systems, or business operations must ensure that pre-employment or pre-engagement screening processes meet Ceribell's established standards. Verification should be completed and results confirmed prior to engagement or placement.

Responsible Sourcing and Environmental Practices

Responsible Sourcing of Minerals

Ceribell is committed to responsible procurement practices and expects Third-Party Partners to operate in alignment with applicable U.S. and international laws governing the sourcing of minerals. While certain components used in Ceribell products may include minerals commonly referred to as 3TG (tantalum, tin, tungsten, and gold), Ceribell does not currently require its Partners to trace these minerals to their country of origin. To promote ethical supply chain practices, Ceribell relies on its established purchasing controls, corporate policies, and a rigorous vendor and supplier approval process. All Partners undergo a thorough review before engagement, and Ceribell only partners with reputable suppliers who demonstrate strong compliance practices and responsible business conduct. Through these measures, Ceribell aims to reduce the risk of sourcing materials that may be associated with human rights abuses or conflict-affected regions.

Resource Efficiency

Third-Party Partners should minimize the use of single-use plastics in their operations. This includes avoiding procurement of disposable items such as plastic straws, stirrers, cutlery, plates, or expanded polystyrene and oxo-degradable plastic cups. Third-Party Partners are also encouraged to conserve natural resources, such as water and energy, by improving efficiency, reducing overall consumption, and using renewable energy sources where feasible.

Prevention of Spills and Releases

Third-Party Partners must implement appropriate systems and controls to prevent accidental spills or releases of substances that could harm the environment or nearby communities. Where incidents occur, immediate action should be taken to mitigate and remediate any adverse effects.

Waste Management

Operations should be designed to minimize the use of hazardous substances and reduce waste generation through prevention, reuse, or recycling. Third-Party Partners should also work to minimize greenhouse gas emissions from sources such as refrigeration systems containing hydrofluorocarbons (HFCs) and from production processes that use solvents or other volatile compounds.

Environmental Compliance and Permitting

Third-Party Partners must comply with all applicable environmental laws and regulations, including obtaining and maintaining required permits, licenses, and registrations. All operational and reporting obligations related to environmental authorizations must be met accurately and in a timely manner.

Risk Management and Oversight

Risk Management

Third-Party Partners must have effective processes in place to identify, assess, and manage risks across all areas covered by this Code. Third-Party Partners should regularly monitor their operations to ensure controls remain appropriate and effective. Internal and, where relevant, external reviews should be conducted periodically to evaluate the strength of these controls and to identify opportunities for improvement. Reviews should also include evaluation of risks and controls associated with any subcontractors or third parties performing work on Ceribell's behalf. Upon Ceribell's reasonable request, the Third-Party Partner shall promptly provide Ceribell with the results, reports, or summaries of any such internal or external reviews and assessments related to the controls covered by this Code.

Documentation and Recordkeeping

Third-Party Partners are expected to maintain accurate and complete documentation demonstrating compliance with this Code, as well as with all applicable laws, regulations, and Ceribell reporting obligations. Such documentation should be made available upon request.

Business Continuity Planning

Third-Party Partners should establish and maintain business continuity and disaster recovery plans for the goods or services provided to Ceribell. These plans should be current, tested periodically, and designed to ensure critical operations can be restored promptly in the event of a disruption, minimizing any impact on Ceribell's business activities or reputation.

Training

Third-Party Partners must ensure that relevant employees, managers, contractors, and suppliers understand and adhere to these expectations. Effective communication and training programs should be implemented to build the knowledge and skills necessary for compliance. Training should promote ethical decision-making and reinforce adherence to applicable laws, regulations, and contractual requirements.

Health and Safety

Worker Protection

Third-Party Partners must ensure that workers are safeguarded from exposure to chemical, biological, and physical hazards, as well as from physically strenuous or unsafe work conditions. This obligation extends to both workplace environments and any company-provided living quarters. Appropriate controls must be in place to prevent harmful exposure to physical, chemical, biological, or psychological risks. Third-Party Partners should implement effective process safety systems to manage and prevent chemical releases and make available information about potential safety, health, and environmental risks—including those involving hazardous materials or pharmaceutical substances. This information must be used to train employees, protect health and safety, and manage associated risks effectively.

Hazard Communication

Safety information related to hazardous materials, including pharmaceutical compounds, intermediates, raw materials, solvents, cleaning agents, products, and waste, must be accessible and used to inform, train, and protect workers from potential harm. All such information should be clearly communicated to ensure workers understand the risks and appropriate protective measures.

Emergency Preparedness

Third-Party Partners are expected to identify and evaluate potential emergency scenarios that could arise in their workplaces or in company-provided accommodations. Plans and response procedures must be developed and maintained to prevent, mitigate, and respond to such emergencies effectively. Emergency plans should include training, communication procedures, and regular testing to ensure readiness and minimize harm to workers and local communities.

Process Safety

Third-Party Partners must have systems and programs designed to identify and control both occupational and process-related hazards, including risks that could affect nearby communities. These programs should quantify risks, assess their potential impact, and include preventive and mitigation measures—such as controls to avoid catastrophic releases of chemicals, fumes, or dust. Controls for chemical and biological processes should be in place to detect, prevent, and effectively respond to potential incidents involving hazardous substances.