

Annual Description of Comprehensive Compliance Program

Pursuant to California Health and Safety Codes §§ 119400-119402

Last modified date: August 30, 2022

Introduction and Declaration

Cognoa, Inc. (“Cognoa”) is a pediatric behavioral health company developing digital diagnostic and therapeutic products with the goals of enabling earlier and more equitable access to care and improving the lives and outcomes of children and families living with behavioral health conditions, starting with autism. We are committed to this mission, as well as maintaining the highest standards of business conduct and ethics.

Cognoa’s Comprehensive Compliance Program (CCP) is consistent with the 2003 U.S. Department of Health and Human Services Office of Inspector General publication “Compliance Program Guidance for Pharmaceutical Manufacturers.” Our CCP is also informed by the AdvaMed “Code of Ethics on Interactions with U.S. Health Care Professionals,” as our company develops digital diagnostic and therapeutic products. The AdvaMed Code is similar to the PhRMA Code but is tailored to serve the needs and interactions that a medical device company may have with a healthcare professional. Our CCP is also tailored to our size, organizational structure, available resources, and the nature of our business.

As of the date of this Compliance Disclosure, Cognoa hereby declares that, to the best of its knowledge, and based on a good faith understanding of the requirements of Section 119402 of the California Health & Safety Code, Cognoa is in material compliance with its CCP and the requirements of the California Health & Safety Code §§ 119400-119402. It is Cognoa’s expectation that all employees and representatives comply with its CCP and all policies that support this program. Cognoa is committed to assessing ongoing compliance with its CCP, which is designed to prevent, detect and respond to potential or actual instances of non-compliance. Cognoa will assess its CCP at least annually, for the purpose of declaring compliance with California Health and Safety Codes §§ 119400-119402 and to enable us to implement necessary adjustments or refinements.

Below is an overview of Cognoa’s CCP.

Overview of CCP

1. Leadership and Structure

a. Compliance Officer - Cognoa has a Chief Compliance Officer who is charged with the responsibility of developing, operating, and monitoring the compliance program. The Chief Compliance Officer reports directly to the Chief Executive Officer at Cognoa and has the authority to report to the Board of Directors. Our Compliance Officer has the ability to effectuate change within the organization and to exercise independent judgment.

b. Compliance Committees - Cognoa has a Compliance Committee that reviews compliance policies and training, evaluates compliance risks, and ensures appropriate corrective actions are taken to address compliance issues. The Compliance Committee is led by the Compliance Officer and has members from Cognoa's functional groups, including Commercial, Finance, and Medical/Clinical.

2. Written Standards and Closing

Cognoa has developed written compliance policies and procedures that guide the company and the conduct of our employees in day-to-day operations. These policies and procedures have been developed under the direction of our General Counsel & Chief Compliance Officer and management from various functional areas.

The Cognoa Code of Conduct is a written statement of ethical and compliance principles, policies, and procedures that all Cognoa management, employees, and contractors are expected to follow. The Code of Conduct was designed to provide guidance on how to fulfill requirements of the Company's compliance program, resolve questions about the appropriateness of our conduct, and report possible violations of law or ethical principles. An employee's obligations under the Code of Conduct include strict observance of all laws and regulations applicable to our Company, ethical standards, and applicable Cognoa policies and procedures.

Consistent with California Health & Safety Code §119402, Cognoa has established a specific annual dollar limit on educational items and promotional activities Cognoa may give or otherwise provide to an individual medical or healthcare professional. This annual dollar limit is \$2,500 per individual medical or healthcare professional and is shared by all Cognoa personnel who interact with the individual. The current spend limit will be in effect for one year from the date of this Compliance Disclosure. Cognoa will evaluate this limit on an annual basis and make any necessary adjustments consistent with any operational or practical issues related to compliance with the California statute. Consistent with the California statute, the annual limit does not include expenditures for the following:

- Financial support for continuing medical education programs
- Financial support for health educational scholarships
- Payments for legitimate professional services (e.g., clinical research, consulting services, speaker training, advisory boards, etc.), including related modest meals

3. Education and Training

Cognoa conducts training and education on its compliance program for all employees. In addition to reading and acknowledging policies and procedures, employees participate in live and web-based training administered through a Learning Management System that assigns training based on employee function and produces automatic audit trails of training activities. Our education and training covers a variety of laws and regulations that impact the way we conduct business, including the AdvaMed Code, anti-kickback laws, the federal False Claims Act, and requirements related to product promotion, privacy, conflicts of interest, and other applicable federal, state, and industry rules and guidelines. Cognoa regularly reviews and

updates its training programs and identifies additional areas of training on an "as needed" basis.

4. Internal Lines of Communication

Cognoa encourages open communication and an open reporting environment. As part of its commitment to ethical and legal behavior, Cognoa requires its employees to report any actual or suspected violations of law or ethical standards so that they can be appropriately investigated and addressed. Employees can raise their concerns confidentially and without fear of retaliation to an appropriate member of management or Cognoa's Legal and Compliance teams.

5. Auditing and Monitoring

Cognoa's compliance program includes regular monitoring and auditing activities as needed and at the direction of the Chief Compliance Officer. The areas for monitoring and auditing are reviewed and updated periodically to reflect evolving compliance concerns, new regulatory requirements, changes in business practices, and other considerations.

6. Responding to Potential Violations

Employees are required to adhere to the Cognoa Code of Conduct and company policies. Any violations can subject an employee to serious disciplinary measures, including possible termination of employment. Although each situation is considered on a case-by-case basis, Cognoa seeks to ensure consistent and appropriate disciplinary and corrective actions are taken in response to violations.

7. Corrective Action Procedures

Cognoa timely investigates suspected and/or reported non-compliance and responds promptly with corrective and preventive actions tailored to address improper actions or prevent potential violations. The exact nature and level or thoroughness of the internal investigation will vary according to the circumstances as appropriate. Upon conclusion of an internal investigation, corrective action and preventative measures are determined and implemented as necessary.

A copy of this Declaration may be obtained by emailing: legal@cognoa.com.