

California Compliance Program Declaration

NeurAxis, Inc. (“NeurAxis”) has established and maintains a Compliance Program in accordance with the Compliance Program Guidance published by the U.S. Department of Health and Human Services Office of Inspector General (the “OIG Guidance”). The NeurAxis Compliance Program, which is tailored to the size, structure, operational activities, and resources of the company, includes policies that reflect the principles set forth in the Code of Ethics on Interactions with Health Care Professionals published by the Advanced Medical Technology Association (“AdvaMed Code”). The Compliance Program is regularly reviewed and updated when necessary to reflect changes in company operations and evolving industry guidance.

The NeurAxis Compliance Program is designed to prevent and detect violations of law and company policies. However, as recognized by the OIG Guidance, the implementation of a compliance program cannot guarantee that improper conduct will be entirely eliminated. NeurAxis expects that its employees and representatives will comply with the Compliance Program, including the NeurAxis Interactions with Health Care Professionals Policy. In the event that NeurAxis becomes aware of potential violations of law or company policy, NeurAxis takes reasonable steps to investigate the matter and properly address Compliance Program violations.

As required by California Health & Safety Code § 119402(d), NeurAxis has implemented an annual promotional spending limit for educational items, promotional materials, or other items or activities that NeurAxis may provide to an individual licensed California health care professional. These promotional items and activities are also subject to additional restrictions set forth in the NeurAxis Interactions with Health Care Professionals Policy (consistent with the AdvaMed Code).

NeurAxis declares that, to the best of its present knowledge and belief, it is in material compliance with its Compliance Program and the relevant requirements of California Health & Safety Code §§ 119400-119402.

To obtain a print copy of this declaration, or for more information regarding the NeurAxis Compliance Program, please contact our Compliance team by phone at 812-689-0791 or by e-mail at compliance@neuraxis.com.

Last updated: January 2026