CERIBELL, INC.

Ethical AI & Data Governance Policy

1. Purpose and Scope

At Ceribell, we use Artificial Intelligence ("AI") and Machine Learning ("ML") to provide high-precision interpretation of EEG data. This policy outlines our commitment to developing and deploying these technologies in a manner that is safe, transparent, and equitable. This policy applies to all proprietary algorithms developed for medical diagnostic support.

2. Core Principles

Our AI development lifecycle is guided by three pillars of "Trustworthy AI":

- **Safety & Reliability:** We prioritize patient safety above all else, ensuring our algorithms are robust and perform consistently in diverse clinical environments.
- **Fairness & Non-Discrimination:** We work to identify and mitigate algorithmic bias to ensure our EEG interpretations are equitable across different patient demographics.
- **Transparency & Accountability:** We promote a "human-in-the-loop" approach where our AI provides clinical decision support; our AI algorithms are not intended to form the sole basis of patient treatment decisions.

3. Governance and Risk Management

- **Risk Management Framework:** We align our AI governance with the NIST AI Risk Management Framework (AI RMF).
- **Board Oversight:** The Nominating and Corporate Governance Committee of the Board of Directors reviews our AI ethics strategy and risk profile at least annually.
- **Management Oversight:** Our cross-functional ESG Steering Committee monitors AI performance metrics, including data drift and interpretability.

4. Algorithmic Bias and Fairness

To ensure our EEG interpretation is valid for all patients, we strive to use training datasets that are representative of the intended patient populations. Ensuring that our algorithm performance is generalizable to our intended patient populations is a key pillar of our real-world performance-based development and continuous improvement processes.

5. Data Privacy and Security

Patient privacy is foundational to our mission.

- **U.S.-Based Development:** All algorithm development and data processing occur within the United States under strict security protocols.
- **Encryption:** All patient data are protected via end-to-end encryption in compliance with HIPAA requirements.

- **Data Minimization:** We collect and process only the minimum amount of data required for development of our algorithms.
- **Security Controls:** Data is safeguarded through administrative, technical and physical security measures.

6. Transparency and Explainability

We offer clinicians documentation and data that explain the operation and the validation methodology of our AI algorithms, ensuring that healthcare providers can make informed, independent medical decisions.

7. Continuous Improvement

We continuously monitor and assess the real-world performance of our AI algorithms to ensure reliability and clinical effectiveness. This includes processes to detect performance degradation or data drift that may occur as clinical environments and patient populations evolve. We also maintain a formal feedback loop to capture clinician feedback and identify edge cases, utilizing this real-world data for continuous algorithm improvements. Additionally, all updates to our AI models undergo a rigorous revalidation process to ensure continued clinical validity and performance.

We are committed to advancing our AI governance framework in step with evolving industry standards, regulatory expectations, and recognized best practices.