



Annual Compliance Declaration

Declaration for California Compliance Law

Heartflow, Inc. (“Heartflow”) has implemented a comprehensive compliance program (the “Program”) in accordance with the Compliance Program Guidance published by the Office of Inspector General, U.S. Department of Health and Human Services (“HHS-OIG Guidance”) that, to the best of our knowledge, meets the requirements of Cal. Health and Safety Code §§ 119400-119402 (“California Law”). Although California Law references compliance with the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (the “PhRMA Code”), Heartflow has adopted policies and procedures that are consistent with the AdvaMed Code of Ethics on Interactions with Healthcare Professionals (“AdvaMed Code”) which is substantially similar to the PhRMA Code but which specifically addresses interactions between medical device manufacturers and healthcare professionals.

The purpose of the Program is to detect and prevent violations of law and/or company policies. As required by California Law, Heartflow has established a specific annual dollar limit that applies to promotional materials, items, and activities that Heartflow provides to certain recipients in California. Heartflow expects its employees to follow the requirements of the program and to comply with all applicable laws, regulations and policies. However, as recognized by the HHS-OIG, it is not possible to guarantee the elimination of improper conduct.

We regularly review, assess and modify our Program, as necessary, to ensure its continued effectiveness.

A copy of this Declaration or a description of our Program may be obtained by contacting corporatecompliance@heartflow.com