



## 2023 California Comprehensive Compliance Program Declaration

### DECLARATION FOR CALIFORNIA COMPLIANCE LAW

As part of Sight Sciences' ongoing efforts in the area of compliance, we have developed a Comprehensive Compliance Program that is designed to comply with applicable federal and state laws and industry standards relating to the marketing and promotion of our products. To our knowledge as of the date of this declaration, Sight Sciences is in compliance with our Comprehensive Compliance program, as described here, and with California Health & Safety Code sections 119400-119402.

Copies of our Comprehensive Compliance Program CCP and our Annual Declaration of Compliance can be obtained by calling us **(833) 624-0284** at, emailing us at [compliance@sightsciences.com](mailto:compliance@sightsciences.com), or visiting our website at [sightsciences.com](http://sightsciences.com).

### OUR COMPREHENSIVE COMPLIANCE PROGRAM

Sight Sciences, Inc. ("Sight Sciences" or "Company") has established a program designed to comply with applicable federal and state laws and industry standards relating to the marketing and promotion of its products. Additionally, Sight Sciences recognizes that adherence to these standards can be furthered through a compliance program that is informed by the Compliance Program Guidance for Pharmaceutical Manufacturers, published by the Office of Inspector General of the U.S. Department of Health and Human Services (the "OIG Guidance"). The OIG Guidance advises that effective compliance programs are comprised of seven elements, which are outlined below. As described below, these elements form the basis of the Company program for compliance with the standards regulating the marketing and promotion of its products.

- **Written Policies and Procedures**

Sight Sciences has written policies and procedures to assure substantial compliance with the applicable laws, regulations and standards governing the marketing and promotion of our products. California law makes reference to compliance with the PhRMA Code on Interactions with Healthcare Professionals. Sight Sciences, however, manufactures medical devices rather than pharmaceutical products and have adopted the Medical Device Manufacturers Association Revised Code of Conduct on Interactions with Healthcare Providers, which is substantially similar to the PhRMA Code. Sight Sciences has established written policies and procedures that govern activities and communications with health care professionals about the appropriate use of our products, including appropriate instruction and education required for the safe and effective use of our products

**Total Annual Dollar Limit for Meals, Educational or Practice-Related Items Training Expenses and Expense Reimbursement for Training Meetings**

Sight Sciences has established an annual limit of \$5000 for meals and educational items as the aggregate value of the items or activities that may be provided to California health care professionals pursuant to the requirements of Cal. Health & Safety Code § 119402 (S.B. 1765).

- **Policy Prohibiting Entertainment**

It is the policy of Sight Sciences not to provide Entertainment (e.g., sporting events, golf outings, concerts, etc.) to health care professionals.



- **Chief Compliance Officer and Compliance Committee**

Sight Sciences has a Chief Compliance Officer who is empowered with appropriate authority to exercise independent judgment and has free and unencumbered access to senior management and board of directors.

Sight Sciences has a Compliance Committee. The committee is comprised of the Company's Chief Compliance Officer and members of the Company's management team.

- **Training**

Sight Sciences has an annual Compliance Training process. New employees receive training at the time of hire and annually thereafter. The training covers applicable guidelines governing our compliance program. Employees are trained on the consequences of failure to comply with the requirements of the Company's compliance program.

- **Communication**

Sight Sciences encourages open and candid discussion between management and employees regarding any compliance concern. Sight Sciences employees are encouraged to report their concerns to their manager or to the Chief Compliance Officer. Employees also have the option to report potential violations anonymously using the Sight Sciences Compliance Hotline at **(833) 624-0284**.

- **Auditing and Monitoring**

Sight Sciences self-assesses and periodically audits its compliance with its policies and procedures.

- **Enforcement and Disciplinary Guidelines**

Sight Sciences may take disciplinary action, up to and including discharge/termination, in response to violation of the Company's compliance policies or procedures. Sight Sciences may conduct an investigation of matters that are brought to the Company's attention in order to ensure the consistent application of the Company's Code of Business Conduct and Ethics and other applicable policies and procedures.

- **Responses to Detected Problems and Actions to Correct Issues**

Sight Sciences requires a prompt and diligent response to potential violations of the Company's compliance program, including its standards regulating the marketing and promotion of our products. Actions in response to detected problems may include improving policies, procedures, training, communication and monitoring or may require disciplinary action to prevent future violations.