

CLEARPOINT NEURO, INC.

REGULATION FD POLICY

The Board of Directors of ClearPoint Neuro, Inc. (the “Company”) has adopted this Regulation FD Policy (the “Policy”) as of September 24, 2025.

I. POLICY STATEMENT

The Company is committed to fair disclosure of accurate information about the Company to the public on a timely basis without advantage to any particular analyst or investor, consistent with the Securities and Exchange Commission’s (“SEC”) Fair Disclosure Regulation (“Regulation FD”). The Company will continue to provide current and potential investors access to key information reasonably required to make an informed decision on whether to invest in the Company’s securities, as required by law or as determined appropriate by management. Consistent with Regulation FD, the Company also will provide reasonable investor access to management. The Company’s management believes it is in the Company’s best interest to maintain an appropriate dialogue with security holders and potential investors regarding the Company’s historical performance and future prospects. At the same time, the Company will also guard its need for confidentiality as determined appropriate by management.

This Policy applies to every director, employee and independent contractor of the Company and its subsidiaries, and complements the Company’s Insider Trading Policy.

II. COMPLIANCE

It is the Company’s policy to comply with all applicable periodic reporting and disclosure requirements established by the SEC, including Regulation FD. Our corporate policy, reflecting current legal requirements, is that our employees and board members will not make any disclosure of material, nonpublic information about the Company to anyone outside the Company (other than to persons who first are obliged in writing to maintain confidentiality), unless we disclose it to the public at the same time. This is a highly technical area with important consequences for the Company.

III. COMPLIANCE GUIDELINES

Regulation FD prohibits the Company from disclosing material nonpublic information to securities professionals (including, for example, analysts, investment advisers, and portfolio managers) and investors unless the information is simultaneously disclosed to the public generally. The Company’s policies on the communication of such information, which are set forth below, are designed to comply with Regulation FD and to provide, where determined appropriate by management or where required by applicable law, for the broad, non-exclusionary dissemination of material nonpublic information.

IV. AUTHORIZED SPOKESPERSONS

The following individuals (“Authorized Spokespersons”) are the only persons authorized to communicate on behalf of the Company to securities analysts, securities market professionals and investors:

- the Chairman of the Board of Directors;

- the Chief Executive Officer;
- the Chief Financial Officer;
- the Chief Business Officer;
- the General Counsel; and
- Vice President, Marketing and/or Investor Relations.

In certain circumstances, the Authorized Spokespersons enumerated above may authorize other officers, employees or representatives of the Company to communicate with securities analysts, securities market professionals and investors on behalf of the Company. These additional individuals will be authorized by an Authorized Spokesperson in advance of any such communications, and will be provided appropriate training on compliance with the Policy.

No employee, agent or representative of the Company is authorized to communicate any information about the Company that is material and nonpublic, except:

- Through public disclosure approved in advance by an Authorized Spokesperson; or
- For business purposes pursuant to a non-disclosure or other confidentiality agreement.

All questions or requests from securities analysts, securities market professionals or investors should be directed to ir@clearpointneuro.com.

V. QUARTERLY EARNINGS CONFERENCE CALLS

The Company may hold quarterly investor conference calls to discuss the Company's financial results. Each of these conference calls will be available to the public via webcast from the Investor Relations section of the Company's website at www.clearpointneuro.com. Reasonable advance public notice of each quarterly conference call will be made through a Company press release and posting on the Company's website.

A replay of each quarterly investor conference call webcast will generally be posted on the Company's website at www.clearpointneuro.com within 24 hours following the webcast and will remain available for a reasonable period of time thereafter, as determined by management.

VI. OTHER COMPANY CONFERENCE CALLS

The Company may hold investor conference calls from time to time on an "ad hoc" basis with respect to significant announcements or developments involving the Company. To the extent practicable, these conference calls will be made available to the public via webcast from the Investor Relations section of the Company's website at www.clearpointneuro.com. Public notice will be provided via Company press release and posting on the Company's website as far in advance of any such webcast as practicable.

VII. SECURITIES FIRM-SPONSORED AND OTHER INVESTOR CONFERENCES

The Company from time to time may participate in securities firm-sponsored and other investor conferences. If the Company's participation at a particular conference will be available to the public via

live webcast, the Company will provide reasonable advance public notice of the webcast through a Company press release and posting on the Company's website. This advance notice shall also provide instructions for accessing any replay of the webcast.

If the Company determines that material nonpublic information has been inadvertently disclosed at one of these conferences which is not available to the public via live webcast following advance notice, appropriate public disclosure will be made via Form 8-K as soon as reasonably practicable.

VIII. ONE-ON-ONE MEETINGS; OTHER PUBLIC FORUMS

Authorized Spokespersons, along with other officers, employees and representatives of the Company invited to participate by an Authorized Spokesperson, may meet privately with securities analysts, securities market professionals and/or investors. Similarly, the Company may participate in public forums at which securities analysts, securities market professionals and/or investors may be present, including industry seminars and conferences and the Company's annual stockholder meetings. The Company does not intend to disclose any material nonpublic information during these meetings.

If the Company determines that material nonpublic information has been inadvertently disclosed at one of these meetings, seminars or conferences, appropriate public disclosure will be made via Form 8-K as soon as reasonably practicable.

IX. ANALYST REPORTS AND EARNINGS MODELS

Analyst reports and earnings models may only be reviewed by an Authorized Spokesperson to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on reports or earnings models may be communicated (orally or in writing) to an analyst.

No Company employee should distribute copies of, or refer to, selected analysts' reports to anyone outside the Company. This is consistent with the Company's intention not to adopt any particular analyst report.

X. RUMORS: NO COMMENT POLICY

The Company will not comment on market rumors in the normal course of business. When it is learned that rumors about the Company are circulating, Authorized Spokespersons should state only that it is Company policy to not comment on rumors or speculation. If the source of the rumor is found to be internal, the General Counsel should be consulted to determine the appropriate response.

XI. VIOLATIONS

Violations of Regulation FD are subject to SEC enforcement action, which may include an administrative action seeking a cease-and-desist order, or a civil action against the Company or an individual seeking an injunction and/or monetary penalties. Any violation of the Policy shall be immediately reported to the Company's General Counsel, who can be reached at legal@clearpointneuro.com, and may constitute grounds for termination of employment.

XII. DEFINITIONS OF "MATERIAL" AND "NONPUBLIC"

Information is "material" if there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision or it could reasonably be expected to have a substantial effect on the price of the Company's securities. While it is not possible to compile an exhaustive list, information concerning any of the following items should be reviewed carefully to determine whether such information is material:

- Earnings, including whether the Company will or will not meet expectations;
- Mergers, acquisitions, tender offers, joint ventures or changes in assets;
- A significant clinical or regulatory development;
- A change in, or new, licensing and development arrangements;
- A significant product development or research and development relationship;
- Developments regarding customers or suppliers (including the acquisition or loss of an important contract);
- Changes in senior management;
- Changes in compensation policy;
- A change in auditors or auditor notification that the Company may no longer rely on an audit report;
- Financings and other events regarding the Company's securities (e.g., defaults on debt securities, calls of securities for redemption, repurchase plans, stock splits, public or private sales of additional securities);
- Significant cybersecurity risks or incidents, including vulnerabilities and breaches;
- Significant litigation; and
- Bankruptcy, corporate restructuring or receivership.

“Nonpublic” information is any information that has not been disseminated in a manner reasonably designed to make it generally available to investors. Disclosure to even a large group of analysts or stockholders does not constitute disclosure to the public. Information is no longer considered to be nonpublic after it has been released broadly to the marketplace and the investing public has had time to fully absorb the information. In order for information to be considered public, it must be widely disseminated in a manner making it generally available to investors through newswire services such as Dow Jones, Reuters, Bloomberg, Business Wire, The Wall Street Journal, Associated Press, or United Press International; a broadcast on widely available radio or television programs; publication in a widely available newspaper, magazine, or news website; a Regulation FD-compliant conference call; or public disclosure documents filed with the SEC that are available on the SEC's website.

XIII. USE OF SOCIAL NETWORKS

Use of social networks, including corporate blogs, employee blogs, chat boards, Facebook, X and the like, to disclose material, nonpublic information is considered selective disclosure and would violate this Policy.

XIV. FURTHER INFORMATION ABOUT REGULATION FD

All inquiries regarding the provisions or procedures of the Policy or Regulation FD generally should be addressed to the Company's General Counsel.