

ACUTUS MEDICAL, INC.

CODE OF BUSINESS ETHICS AND CONDUCT

(Effective December 1, 2019)

I. Purpose

This Code of Business Ethics and Conduct (the "**Code**") was adopted to further the commitment of Acutus Medical, Inc. (the "**Company**") to conducting its business with honesty and integrity. This Code applies to all the employees and officers (all of whom are referred to collectively as "**employees**"), directors on the board of directors of the Company ("**directors**"), and contractors of the Company.

The Company requires all of its directors, officers, employees and contractors (collectively, "personnel") to adhere to the ethical standards established by the Compliance Program, including this Code of Conduct and to comply with all applicable law and regulation when engaging in business conduct on behalf of the Company. This is a fundamental obligation of each member of the Company's personnel and is consistent with the personal responsibility of each of them to preserve and safeguard the Company's assets and valuable reputation. This Code must be observed by all Company personnel. Failure to adhere to this Code and any applicable laws or regulations may result in disciplinary action up to and including termination.

The Code is intended to ensure and promote:

- fair and accurate financial reporting;
- ethical conduct and compliance with applicable laws, rules and regulations including, without limitation, full, fair, accurate, timely and understandable disclosure in reports and documents we file with or submit to the U.S. Securities and Exchange Commission and in our other public communications;
- compliance with governmental laws, rules and regulations;
- the prompt internal reporting of violations of this Code as set forth in the Code;
- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
- a culture of honesty and accountability; and
- the deterrence of wrongdoing.

The Code is not intended to create obligations of the Company or the Company's board of directors (the "**Board**") beyond those established by applicable laws or regulations. As a result, use of the word "shall," "should" or "will" with respect to an activity or responsibility, shall be interpreted to create only the legal obligation that would have been imposed on the Company or the Board in the absence of the Code. To the extent this Code might be interpreted to create any responsibility or obligation beyond that required by law or regulation (a "**Discretionary Responsibility**"), it will be interpreted to not create any material or legally enforceable obligation or responsibility, and any such Discretionary Responsibility may be waived or modified at the full discretion of the Company or the Board.

All Company personnel are expected to read the policies set forth in the Code and ensure that they understand and comply with them. The Company's Chief Compliance Officer (the "**CCO**") is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation. Any questions about the Code or the appropriate course of conduct in a particular situation should be directed to the CCO, who may consult with the Company's outside legal counsel or the Board, as appropriate.

The Code should be read in conjunction with other policies applicable to Company personnel. Any determination with respect to the applicability of the provisions of this Code with respect to officers or directors of the Company may be made only by the Board.

II. Conduct of the Company's Business in a Legal and Ethical Manner

The Company expects that all Company personnel will:

- (1) Act with honesty, integrity and objectivity, without allowing independent judgment to be subordinated.
- (2) Understand and comply with all applicable laws, rules and the Comprehensive Compliance Program including this Code of Conduct and other Company policies and procedures ("the Compliance Program").
- (3) Promptly contact a supervisor or the CCO whenever there is a question about whether particular conduct violates the law or the Compliance Program.
- (4) Attend any Company-sponsored compliance training, as it relates to job functions.
- (5) Immediately notify the CCO of any pending criminal investigations involving healthcare fraud of which they are a target or any pending proceedings against them that could result in them being excluded or debarred.
- (6) Not commit or tolerate any conduct that may put the Company at risk of violating the law or the Company's ethical principles, or the Compliance Program
- (7) Act in good faith, responsibly, with due care, competence and diligence and without misrepresenting material facts or circumstances to customers, the public or anyone else.
- (8) Promote ethical behavior among employees, particularly those they supervise.
- (9) Use and control all Company assets and resources solely for the benefit of the Company.
- (10) Promptly report any suspected or actual violations of applicable law or the Compliance Program to the CCO.

III. Employment at or Affiliation with the Company

The Company will not employ or contract with any individual or entity who: (a) has been convicted of a criminal offense related to health care, or (b) is debarred, excluded or is otherwise ineligible for participation in federal or state health care programs. For each new director, officer, employee or contractor, the Company will:

- (1) Perform a background check;
- (2) Review (a) the List of Excluded Individuals and Entities maintained by the OIG (<https://exclusions.oig.hhs.gov/>) and (b) the Excluded Parties List System maintained by the GSA (<https://sam.gov/SAM/pages/public/searchRecords/search.jsf>).

The performance of these background investigations shall be documented and maintained in the appropriate personnel or contract files. Exclusion list reviews will be repeated annually for all directors, employees and contractors and records of these periodic reviews also will be maintained.

IV. Accuracy and Integrity of Books, Records, Financial Reports, and Other Records

The Company's books, records, and accounts must completely and accurately reflect the nature of the transactions recorded. This includes, but is not limited to, financial transactions, expense reports, activity reports, and other documents used in the normal course of business. All Company personnel are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to the Company. The Company expects all personnel to take this responsibility very seriously to ensure full, fair, accurate, timely, and understandable disclosure in reports and documents that the Company files with government agencies or releases to the general public.

All Company personnel, to the extent involved in the Company's disclosure process, including without limitation, the principal executive officer, principal financial officer and other senior employees who perform similar functions in the Company (collectively, "**Senior Financial Officers**"), must familiarize themselves with the disclosure requirements applicable to the Company as well as the business and financial operations of the Company, and must not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or

outside the Company, including to the Company's independent auditors, governmental regulators and self-regulatory organizations.

All of the Company's books, records, accounts, and financial statements must be maintained in reasonable detail, and reflect the matters to which they relate accurately, fairly, and completely. Furthermore, all books, records, accounts and financial statements must conform both to applicable legal requirements and to the Company's system of internal controls. All assets of the Company must be carefully and properly accounted for. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation and authorization. Misclassification of transactions as to accounts, business units, or accounting periods is forbidden. Each personnel bears responsibility for ensuring that he or she is not party to a false or misleading accounting entry.

V. Conflicts of Interest

All Company personnel must avoid any investment, interest, activity, or association that interferes, or might interfere with or might appear to interfere with, their obligation to perform their responsibilities in the best interests of the Company. A conflict of interest is any activity or interest that is inconsistent with or opposed to the best interests of the Company. An employee's and director's decision and actions in the course of employment or other relationship with the Company should be based on the best interests of the Company and not based on personal relationships or benefits. Employees and directors should never use or attempt to use their position with the Company to obtain improper personal benefits. Any situation, transaction or relationship that may give rise to an actual or potential conflict of interest should be disclosed to the Company and should be avoided, unless approved by the Company.

The following are some examples of conflicts of interest to be avoided:

- Family Members. Directors and employees should not conduct business on behalf of the Company with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to and authorized by the Company and is a bona fide arms-length transaction. "Family members" include a spouse, parents, children, siblings, and in-laws.
- Interests in Other Businesses. Employees may not accept compensation in any form for services performed for the Company from any source other than the Company. Employees should not have an undisclosed material financial interest in a competitor, supplier, or customer of the Company.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. We encourage you to seek guidance from your manager, human resources or the CCO when you have any questions or doubts.

If you are aware of an actual or potential conflict of interest where your interests may conflict with the Company's interests, or are concerned that a conflict might develop, please discuss with your manager and then obtain approval from the CCO or their designee before engaging in that activity or accepting anything of material value. Please also note that, to the extent your proposed engagement or activity could constitute a "related person transaction," it will also be addressed pursuant to our Related Party Transaction Policy.

VI. Protection of Confidential Information

The disclosure of confidential information regarding the Company's business or scientific operations, whether intentional or accidental, may adversely affect the financial stability and competitive position of the Company as well as the job security of employees. In carrying out the Company's business, employees may learn confidential or proprietary information about the Company, its customers, suppliers, or joint venture parties. Confidential or proprietary information of the Company, and of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

Employees must maintain the confidentiality of information about the Company and other companies entrusted to them by the Company, use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and

outside the Company, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

Company personnel shall not, without the written consent of senior management, during the term of employment or thereafter, use, directly or indirectly, for the personal benefit of themselves or others, or disclose to others, any confidential information of the Company or of other entities obtained during the course of their employment at the Company. Furthermore, to the extent the Company receives individually identifiable health information purposely or inadvertently, employees shall safeguard such information in accordance with the Company's policies and procedures.

Company personnel shall not seek or accept confidential information of a competitor in an illegal or unethical manner, and if a competitor's confidential information is offered or given to the individual, the individual shall immediately report the matter to his/her supervisor or the CCO.

The obligation to protect confidential information does not end when an employee leaves the Company. Any questions about whether information is confidential should be directed to the CCO.

VII. Compliance with Laws, Rules & Regulations

The Company will operate all aspects of its business in compliance with all applicable federal, state and local laws and regulations and the Comprehensive Compliance Program. Violations will be subject to disciplinary action, up to and including termination. All Company personnel must respect and obey all laws when carrying out responsibilities on behalf of the Company and refrain from illegal conduct.

Employees have an obligation to be knowledgeable about specific laws, rules, and regulations that apply to their areas of responsibility. If a law conflicts with a policy in this Code, employees must comply with the law.

Any questions as to the applicability of any law should be directed to the CCO. The following is a brief summary of certain topics about which employees should be aware:

A. Antitrust

Competition laws and regulations throughout the world are designed to foster a competitive marketplace and prohibit activities that restrain trade. Generally, actions taken in combination with other companies that restrain competition may violate the antitrust laws. Certain antitrust violations involving agreements with competitors are crimes and can result in large fines and prison terms for the individuals involved. In addition, actions taken by an individual company in market segments in which it has a particularly strong position may violate the antitrust laws if the actions have the effect of excluding competition through unfair means.

The Company is dedicated to compliance with laws governing fair competition in all of its activities. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and employees should seek counsel before taking any action whenever appropriate.

B. Health, Safety & Environment

The Company works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Compliance with all applicable laws, rules and regulations governing health, safety, and the environment are a responsibility of management and employees in all functions.

C. Healthcare Fraud and Abuse Laws

The Company will comply with all applicable federal and state healthcare fraud and abuse laws and regulations, including the federal Anti-Kickback Statute (42 U.S.C. §1320a-7b(b)) as well as with all applicable provisions of the Federal False Claims Act. (31 U.S.C. §3729 et seq.). These fraud and abuse laws prohibit, among other things, payment or receipt of kickbacks and other forms of improper "remuneration" in return for purchasing, leasing, ordering or recommending the purchase, lease or ordering of any goods, facilities, services or items covered under federal or state health care programs.

Common business practices such as providing discounts, rebates, or services to customers may have potential fraud and abuse law implications if the Company does not document and structure these practices properly. Inappropriate consulting arrangements or educational or research grants also may have potential fraud and abuse law implications. Please refer to the Company's Healthcare Regulatory Compliance Policies and Procedures for information on properly structuring such arrangements.

The Federal False Claims Act prohibits submission or causing the submission of fraudulent claims to Medicare and other federal and state programs. Only true and accurate reimbursement information may be provided to customers. The Federal False Claims Act also prohibits the filing of incorrect reports, including quarterly Average Sales Price.

D. Food and Drug Laws

The Company will comply with all applicable laws and regulations and all Company policies, procedures, rules and practices that govern the research, development, manufacture, distribution, and promotion and advertising of medical devices cleared/approved under the Federal Food, Drug and Cosmetic Act.

E. State Laws Regulating Compliance and Marketing Activities

The Company will comply with all applicable state laws and regulations governing its business, including state laws and regulations governing device manufacturer compliance programs, initiatives and interactions with health care professionals, including the statutory requirements of California Health and Safety Code §§119400-119402 and Mass. Gen. Laws ch. 111N, §§ 1-7 and 105 Mass. Code Regs. §§ 970.000-970.101.

F. The Comprehensive Compliance Program

Adherence to all elements of the Comprehensive Compliance Program will be a factor in evaluating the performance of Company personnel, including managers and supervisors. Any Company personnel who violate any part of the Comprehensive Compliance Program will be subject to disciplinary action up to and including termination.

G. Compliance with Industry Standards

The Company's Healthcare Regulatory Compliance Policies and Procedures are based upon the AdvaMed Code of Ethics on Interactions with Health Professionals. Company personnel must follow the Company's Healthcare Regulatory Compliance Policies and Procedures whenever they interact with licensed health professionals (including, but not limited to, physicians, nurses, and pharmacists), medical students, or members of purchasing committees for health care providers or medical practice groups.

H. Employment Laws

The Company works to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.

It is the policy of the Company to provide employment opportunities without regard to and to prohibit discrimination against or harassment of any employee on the basis of race, religion, color, sex, pregnancy, national origin, age, physical or mental disability, military or covered-veteran status, marital status, sexual orientation, family medical leave, gender identity or any other classification protected by applicable federal, state or local law. Any employee who is found to have discriminated against another employee on these bases is subject to discipline up to and including termination. Decisions as to hiring, promotion and other aspects of the employment relationship are based solely upon job-related qualifications.

The Company also prohibits sexual harassment, as well as harassment based on any of the other characteristics listed above, and will take appropriate action to eliminate prohibited harassment and remedy the effects of such harassment.

No individual will suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination.

I. Foreign Corrupt Practices and Anti-Bribery Laws

Directors and employees may only transact business on behalf of the Company in foreign markets and with foreign government officials in accordance with the Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act and applicable local law. Directors and employees should never engage in any bribery, kickbacks or other types of corruption when dealing with customers, suppliers or other third parties regardless of local practices or competitive intensity. Specifically, directors and employees should never directly or indirectly via a third party make or provide a payment (including cash or any other items of value such as meals, gifts, travel, entertainment, etc.) to a foreign official or government employee to corruptly influence the foreign official or government employee, obtain or retain business for the Company or to acquire any improper advantage.

If a director or employee is unaware of the legal rules involving these activities, he or she should consult with the CCO before taking any such action. For more information about the FCPA and the rules governing providing things of value to foreign officials, please contact our CCO.

J. Insider Trading

Under federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. It is your responsibility to comply with these laws and not to share material non-public information. We have also adopted an Insider Trading Policy with which you must comply. For more information about insider trading laws, please reference our Insider Trading Policy which can be found on the Company’s internal website.

K. Other Laws

Various other types of laws may be applicable to Company activities. Please consult with your supervisor or the CCO if you are unsure about which laws are applicable to your activities.

VIII. Gifts and Entertainment

Company personnel shall not seek, accept, offer, promise, or give any payment, fees, loans, services or gifts from or to any person or firm as a condition or result of doing business with the Company. Business courtesies, gifts and entertainment must comply with the requirements of the Company’s Healthcare Regulatory Compliance Policies and Procedures or Company’s state-specific policies and procedures governing interactions with health care professionals in such states.

IX. Dealings with Government Agencies

Any communication with a government agency must be responsive, accurate, and complete. Any data or other information provided to a government agency must be accurate, complete, and include an explanation of any omission or inability to respond. Records of such communications must be retained in accordance with the Company’s data retention policies and procedures. All government agents will be treated with respect. Any inquiry from a government agent outside the normal course of administrative interactions for purposes of compliance with mandatory reporting requirements will be referred to the CCO.

X. Ensuring Compliance

A. Seeking Guidance

Employees are encouraged to seek guidance from supervisors, managers or other appropriate personnel when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding the Code should be brought to the attention of the CCO.

B. Reporting Violations

If an employee knows of or suspects a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), he or she should report it immediately to the CCO. See the Whistleblower Policy for information about making anonymous reports.

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. The Company does not permit retaliation of any kind for good faith reports of violations or possible violations.

C. Investigations

Reported violations will be promptly and thoroughly investigated. It is imperative that the person reporting the violation not conduct an investigation on his or her own. Directors and employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Directors and employees should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, you are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

D. Sanctions

Employees who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, employees or officers who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject the employee, officer or director to civil and criminal liability.

E. Disclosure

Nothing contained in this Code or any other Company agreement or policy is intended to prohibit or restrict you from disclosing confidential information to any government, regulatory or self-regulatory agency including under Section 21F of the Securities and Exchange Act of 1934 and the rules thereunder.

XI. Appropriate Use of Electronic Media

The Company provides access to and use of electronic mail, voicemail, the Internet, and other electronic media for business purposes. The Company's electronic media shall not be used for any purposes that violate federal, state or local laws.

XII. Policies Relating to Document Retention and Destruction

The Company will retain those documents that it is required to retain in order to comply with pertinent laws and regulations and that are needed for its daily operations. Documents will be retained long enough to satisfy specific legal requirements. Where documents are no longer required to be maintained by law or by legitimate business needs, they may be destroyed but shall be done in accordance with the Company's policies.

The basic rule allowing destruction of certain documents shall not apply after one of the following circumstances occurs:

- (1) Service of legal process;
- (2) Inquiries indicating the commencement of litigation; or
- (3) Notice from the CCO.

Under these circumstances, no documents should be destroyed until written approval has been received from the CCO. Contact the CCO if you have questions about the appropriateness of destroying certain documents.

XIII. Amendment

The Company is continuously reviewing and updating its policies, and therefore reserves the right to amend this Code at any time for any reason.

XIV. Ask Questions if Necessary to Ensure Compliance

All Company personnel should contact their supervisor or the CCO if they have questions about applicable law or any issues addressed in the Compliance Program, this Code of Conduct, or other Company policies in order to ensure full compliance.

You can reach the CCO (Gary Doherty) at: Gary.Doherty@Acutus.com or (442) 232-6080.