

MYOMO, INC.
CODE OF BUSINESS CONDUCT AND ETHICS

Adopted December 11, 2020

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1. Introduction

This Code of Business Conduct and Ethics (the “Code”) covers a wide range of business practices and procedures. The Code reflects Myomo, Inc. and its subsidiaries (collectively, “Myomo” or the “Company”) commitment to compliance. It does not cover every issue that may arise, but it sets out basic principles to guide all directors, officers and employees of Myomo in making ethical and legal decisions when conducting the Company’s business and performing their day-to-day duties. Myomo expects each director, officer and employee to exercise reasonable judgment to determine whether a course of action is consistent with Myomo’s ethical and legal standards, and to seek guidance when appropriate. The Code should also be provided to and followed by Myomo’s agents and representatives, including consultants.

According to the Myomo Employee Handbook, if you violate the standards in the Code, you may be subject to disciplinary action, up to and including termination of employment or service. *If you are in a situation that you believe may violate or lead to a violation of the Code, contact the Compliance Officer, Human Resources Department, Chief Executive Officer, or the Chair of the Audit Committee.*

If a law conflicts with a policy in the Code, you must comply with the law. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. However, this Code supersedes all other codes of conduct, policies, procedures, instructions, practices, rules or written or verbal representations to the extent that they are inconsistent with the Code. We are committed to continuously reviewing and updating our policies and procedures. The Code, therefore, is subject to modification by the Board of Directors of the Company (the “Board”) or a committee thereof.

Nothing in this Code, in any Myomo policies and procedures, or in other related communications (verbal or written) creates or implies an employment contract or term of employment or appointment for any person.

2. Purpose

The Code seeks to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- The conduct of its directors, officers and employees in a professional manner at all times;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Myomo files with, or submits to, all “Governmental Agencies”

(see definition in #3) such as the Securities and Exchange Commission (the “SEC”) and in other public communications made by Myomo;

- Compliance with applicable governmental laws, rules and regulations; *and*
- The prompt internal reporting to an appropriate person or persons identified in the Code of violations of the Code; and accountability for adherence to the Code.

3. Compliance With Applicable Laws, Rules and Regulations; Whistleblower Protection

Obedying the law is the foundation on which Myomo’s ethical standards are built. You must comply with applicable laws, rules and regulations. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

If you become aware of the violation of any law, rule or regulation by the Company, whether by its directors, officers, employees or any third party doing business on behalf of the Company, subject to the provisions in the following paragraph, it is your responsibility to promptly report the matter to, the Compliance Officer or the General Counsel.

Whistleblower Protection: Nothing contained in this Code, any agreement you have entered into with the Company, or any other Company policy limits your ability, with or without notice to the Company, to: (i) file a charge or complaint with any federal, state or local governmental agency or commission (a “Government Agency”) such as the Equal Employment Opportunity Commission, the National Labor Relations Board or the Securities and Exchange Commission (the “SEC”); (ii) communicate with any Government Agency or otherwise participate in any investigation or proceeding that may be conducted by any Government Agency, including by providing information or documents not subject to attorney-client privilege; (iii) exercise any rights under Section 7 of the National Labor Relations Act, which are available to non-supervisory employees, including assisting co-workers with or discussing any employment issue as part of engaging in concerted activities for the purpose of mutual aid or protection; (iv) share compensation information concerning you or others (provided that this does not permit you to disclose compensation information concerning others that you obtain because your job responsibilities require or allow access to such information); (v) discuss or disclose information about unlawful acts in the workplace, such as harassment or discrimination or any other conduct that you have reason to believe is unlawful; or (vi) testify truthfully in a legal proceeding. Any communications and disclosures related to these matters must be consistent with applicable law and the information disclosed must not have been obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted consistent with such privilege or applicable law). The Company will not limit any right you may have to receive an award pursuant to the whistleblower provisions of any applicable law or regulation for providing information to the SEC or any other Government Agency. Any provisions of any agreement between the Company and any current or former employee that is inconsistent with the above language or that may limit or interfere with the ability of any person to receive an award under the whistleblower provisions of applicable law will not be enforced by the Company.

4. Compliance with Federal and State False Claim Act Laws

The False Claims Act establishes liability for any person who knowingly submits a false or fraudulent claim for payment to the local, state or federal government. Myomo is committed to ensuring no false or fraudulent claims are submitted in compliance with all Federal and State False Claim Act Laws.

5. Compliance at Myomo

Myomo has established a structured compliance system to support legal and ethical actions throughout the Company. Compliance with this policy will be led by the Compliance Officer and the Audit Committee, but the responsibility for compliance is shared by all employees. The Compliance Officer will be responsible for overseeing the Myomo compliance system, including maintaining current policies, conducting training, auditing, monitoring, testing, communication, investigations and enforcement. The Compliance Officer will provide oversight for compliance strategy and keep the Board and its standing Committees informed of significant compliance issues, risks and trends.

6. Conflicts of Interest

The Company recognizes and respects the right of its directors, officers and employees to engage in outside activities that they may deem proper and desirable, provided that these activities do not impair or interfere with the performance of their duties to the Company or their ability to act in the Company's best interests. In most, if not all, cases this will mean that our directors, officers and employees must avoid situations that present a potential or actual conflict between their personal or outside professional interests and the Company's interests.

A "conflict of interest" exists when a person's private interests interfere or conflict in any way with the interests of Myomo, or impair, or could be perceived to impair a person's business judgment. Decisions should be made strictly on the basis of Myomo's best interests, without regard to personal concerns. You should avoid situations that present potential conflicts of interest, either real or perceived, and should not engage in activities that would make it difficult or appear to make it difficult for you to perform your work objectively and effectively. Examples of when a conflict of interest or potential conflict of interest may arise include but are not limited to:

- When a director, officer or employee takes actions or has outside interests, responsibilities or obligations that can make it difficult to perform his or her work objectively and effectively in the Company's best interests.
- When a director, officer or employee, or his or her relative or significant other, receives personal benefits (whether improper or not) as a result of his or her position with Myomo.
- When an employee works with a customer or supplier, except on our behalf.
- When an employee works for a competitor. . You are not allowed to work for a competitor in any capacity.
- When a director, officer or employee serves as a member of the board of directors or advisory board of any company that competes with Myomo.
- When a director, officer or employee invests in a customer, supplier, developer or competitor of Myomo. In deciding whether to make such an investment, you should consider the size and nature of the investment, your ability to influence

decisions of Myomo or of the other company, your access to confidential information of Myomo or of the other company, and the nature of the relationship between Myomo and the other company.

When a director, officer or employee conducts Myomo business with a relative or significant other, or with a business with which a relative or significant other is associated in any significant role. Relatives include spouse, siblings, children, parents, grandparents, aunts, uncles, nieces, nephews, cousins, step relationships and in-laws. Significant others include persons living in a spousal or familial fashion (including same sex), with an employee, officer or director.

Any material transaction, responsibility, obligation or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to the Compliance Officer, who may notify the Board or a committee of the Board as he or she deems appropriate. Actual or potential conflicts of interest involving a director, officer or employee other than the Compliance Officer should be disclosed directly to the Compliance Officer. Actual or potential conflicts of interest involving the Compliance Officer should be disclosed directly to the Chief Executive Officer.

7. Public Disclosure of Information

The federal securities laws require Myomo to disclose certain information in various reports that the Company must file with or submit to the SEC. In addition, from time to time, Myomo makes other public communications, such as issuing press releases.

Myomo expects all directors, officers and employees who are involved in the preparation of SEC reports or other public documents to ensure that the information disclosed in those documents is complete, fair, accurate, timely and understandable.

To the extent that you reasonably believe that questionable accounting or auditing conduct or practices have occurred or are occurring, you should report those concerns to the Chair of Myomo's Audit Committee.

8. Insider Trading

You are not permitted to use or share confidential information for stock trading purposes or for any other purpose, except for the conduct of our business. All non-public information about Myomo should be considered confidential information until it has been adequately disclosed to the public. Also, you may not trade in the securities of other companies about which you learn material, non-public information through the course of your employment with, or service to, Myomo. "Material non-public information" includes information that is not available to the public at large that could affect the market price of Myomo securities or another company's securities and that a reasonable investor would consider important in deciding whether to buy, sell or hold the securities. To use material non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical, but also illegal, and could result in criminal prosecution, in addition to the termination of your employment. In order to assist with compliance with laws against insider trading and avoid even the appearance of an improper transaction, the Company has adopted an Insider Trading Policy. A copy of this policy is

distributed to every director, officer and employee and included within the Employee Handbook. If you have any questions regarding the Company's Insider Trading Policy or as to whether information is material or has been adequately disclosed, please consult the Compliance Officer.

9. Corporate Opportunities

You are prohibited from taking for yourself opportunities that are discovered through the use of corporate property, information or position without the informed prior consent of the Board. You may not use corporate property or information obtained through your position with Myomo for improper personal gain or to compete with Myomo, directly or indirectly. Furthermore, you owe a duty to Myomo to advance its legitimate interests when such an opportunity arises.

10. Competition, Fair Dealing and Billing Integrity

Myomo is committed to outperforming its competition fairly and honestly. Misappropriating proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. You should endeavor to respect the rights of and deal fairly with Myomo's customers, suppliers and competitors and their employees.

Myomo is committed to billing only for properly authorized, performed and medically necessary services.

11. Antitrust and Competition Laws

Myomo's company policy is to comply fully with both the letter and spirit of antitrust and competition laws. One general concept is that all companies should compete individually rather than enter into agreements with others to restrict competition. In order to avoid creating even the appearance of improper agreements, the Company prohibits:

- discussions or other contacts with competitors regarding price fixing, stabilization, or discrimination;
- discussions or other contacts with suppliers and customers about issues that could unfairly restrict trade, such as excluding competitors from the marketplace;
- discussions or other contacts with competitors regarding territories or markets in which competitive products will be sold, allocation of markets or customers, or limitations on the sale of products; and
- discussions or other contacts with others to boycott customers or suppliers.

Another general concept is that companies should not engage in unfair competitive practices. Each employee, officer, and director of the Company will deal fairly and honestly with customers, suppliers, partners, and competitors. No one will engage in any unfair dealing, which could include, but would not be limited to, the following: misrepresenting (affirmatively or by omission) material facts, abusing privileged or confidential information, obtaining market data and other information from unauthorized sources, and making inaccurate or malicious statements about competitors or competitive products.

Many countries have antitrust or competition laws that vary significantly from U.S. laws.

Antitrust and competition laws in other countries may regulate, among other things, distribution agreements; patent, copyright, and trademark licenses; territorial and other restrictions on resellers and licensees; rebates and discounts to customers; refusals to deal; and licensing and pricing policies generally. All customers within the same competitive market must generally be treated on a fair and equitable basis with respect to prices, terms, and trade promotion. Violation of antitrust and competition laws carry stiff financial penalties and sometimes jail sentences. Because the laws are complex, please consult the Compliance Officer before acting if you have any questions.

12. Gifts, Bribes, Kickbacks and Other Improper Payments

The Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer or employee should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment. Myomo also prohibits “commercial bribery” that refers to the furnishing of something of value to an intermediary without his or her supervisor’s knowledge, with the intent to influence a third party’s commercial conduct. Accordingly, the Company prohibits any employee, consultant, middleman, or other agent acting on such individual’s behalf or on behalf of the Company from directly or indirectly engaging in commercial bribery.

You should take particular care to avoid accepting any favor or anything of value which could reasonably be interpreted as influencing your judgment in performing your duties for Myomo. Please discuss with the Compliance Officer any gifts or proposed gifts that you are not certain are appropriate for receipt or for giving.

The promise, offer or delivery of a gift, favor or other gratuity in violation of these rules may not only violate Myomo policy, but could also be a criminal offense.

13. Political Contributions/Gifts

Business contributions to political campaigns are strictly regulated by federal, state, provincial and local law in the U.S. and many other jurisdictions. Accordingly, all political contributions proposed to be made with the Company’s funds must be coordinated through and approved by the Compliance Officer. Directors, officers and employees may not, without the approval of the Compliance Officer, use any Company funds for political contributions of any kind to any political candidate or holder of any national, state or local government office. Directors, officers and employees may make personal contributions, but should not represent that they are making contributions on the Company’s behalf. Specific questions should be directed to the Compliance Officer.

14. Discrimination and Harassment

Myomo is dedicated to ensuring equal opportunity in all areas of employment, including hiring, promotions, and terminations. Myomo strictly prohibits any form of illegal discrimination or harassment. This includes, but is not limited to, derogatory remarks related to race, ethnicity, gender, religion, age, disability, or sexual orientation, as well as unwelcome sexual advances,

inappropriate touching, and any other behavior that creates a hostile or intimidating work environment. We are committed to maintaining a workplace where every employee feels respected, valued, and safe.

15. Health and Safety

Myomo strives to provide a safe and healthy work environment for our employees and visitors. All employees have the opportunity and responsibility to contribute to a safe work environment by using commonsense rules and safe practices and by notifying management when any health or safety issues are present. All employees are encouraged to partner with management to ensure maximum safety for all. Any workplace injury, accident, or illness must be reported to the employee's manager and Human Resources as soon as possible, regardless of the severity of the injury or accident. During an emergency/disaster situation, Myomo will adhere to its emergency management policies and procedures.

16. Workplace Violence Prevention

Myomo is committed to providing a safe, violence-free workplace for our employees. Due to this commitment, we discourage employees from engaging in any physical confrontation with a violent or potentially violent individual or from behaving in a threatening or violent manner. Threats, threatening language, or any other acts of aggression or violence made toward or by any employee will not be tolerated. A threat may include any verbal or physical harassment or abuse; attempts to intimidate others; menacing gestures; stalking; or any other hostile, aggressive, and/or destructive actions taken for the purposes of intimidation. This policy covers any violent or potentially violent behavior that occurs in the workplace or at company-sponsored functions.

All Myomo employees bear the responsibility of keeping our work environment free from violence or potential violence. Any employee who witnesses or is the recipient of violent behavior should promptly inform their manager, and Human Resources. All threats will be promptly investigated. No employee will be subject to retaliation, intimidation, or discipline as a result of reporting a threat in good faith under this guideline.

Any individual engaging in violence against the Company, its employees, or its property will be prosecuted to the full extent of the law. All acts will be investigated, and the appropriate action will be taken. Any such act or threatening behavior may result in disciplinary action up to and including termination.

Myomo prohibits the possession of weapons on its property at all times, including our parking lots or company vehicles. Additionally, while on duty, employees may not carry a weapon of any type. Weapons include, but are not limited to, handguns, rifles, automatic weapons, knives that can be used as weapons (excluding pocketknives, utility knives, and other instruments that are used to open packages or cut string and for other miscellaneous tasks), martial arts paraphernalia, stun guns, and tear gas. Any employee violating this policy is subject to discipline up to and including dismissal for the first offense.

17. Drug and Alcohol-Free Workplace

It is the policy of Myomo to maintain a drug- and alcohol-free work environment that is safe

and productive for employees and others having business with the Company.

The unlawful use, possession, purchase, sale, or distribution of or being under the influence of any illegal drug or controlled substance (including medical marijuana) while on company or client premises or while performing services for the Company is strictly prohibited. Myomo also prohibits reporting to work or performing services under the influence of alcohol or any controlled substances or consuming alcohol or any controlled substances while on duty or during work hours, which may impact the employee's ability to perform their job or otherwise pose safety concerns.

Compliance with this policy is a condition of employment. Employees who test positive or who refuse to submit to substance abuse screening will be subject to termination. Notwithstanding any provision herein, this policy will be enforced at all times in accordance with applicable state and local law. Any employee violating this policy is subject to discipline, up to and including termination.

18. Regulatory Requirements

Myomo follows all applicable laws governing the manufacturing and distribution of medical devices. In particular, we observe the requirements of the U.S. Food and Drug Administration (the "FDA"), and we expect every employee to do likewise at all times.

These requirements affect employees who work inside and outside the U.S. alike, as many FDA requirements apply outside of national boundaries. While there are many FDA regulations to consider, regulation of advertising and promotion directly affects our everyday communications. Therefore, all employees are obligated to understand the basic rules with respect to labeling, promotion, off-label use, and adverse event reporting.

As a medical device company, Myomo is also subject to many healthcare rules and regulations designed to protect the public. As a Myomo employee, you must comply with the laws relating to the conduct of business in the medical device industry that address:

- fraud and abuse in government healthcare programs (Medicare and Medicaid);
- compliance with Medicare, Medicaid or other third-party payers' billing, coding, and coverage requirements;
- standards with third-party payers' credentialing and enrollment requirements;
- payments to physicians and other ordering providers to incentivize orders of our products or otherwise improperly influence medical judgment;
- collecting and reporting payments made to physicians and other healthcare providers; and
- the protection of patients and improvement in the quality of health care services.

19. Patient Privacy

During the course of business activities, we may have the opportunity to view a person's medical records, or learn the identity of a patient/study subject or other personal medical information. This information is entrusted to us with the understanding that it will be kept confidential. Employees must guard the confidentiality of all medical information in our possession at all times. Confidentiality applies 24 hours a day, 365 days a year, both inside and outside the workplace. The disclosure of confidential medical information is strictly

prohibited by law in most countries. Please contact the Compliance Officer if any disclosure of confidential personal information is discovered.

20. Record-Keeping

Myomo requires honest and accurate recording and reporting of information in order to make responsible business decisions and to comply with the law. For example, employees who must report their hours worked should only report the true and actual number of hours worked (whether for purposes of individual pay or for purposes of reporting such information to customers). Myomo also requires each director and employee to disclose any transaction or arrangement among such individual or any family member or affiliated entity of such individual, on the one hand, and any other director, employee or any family member or affiliated entity of such other individual, on the other hand, that in any way relates to or arises out of such individual's professional or working relationship with Myomo.

Myomo's Business Expense policy outlines how employees are reimbursed for work-related expenses. The Company complies with the Travel and Entertainment provisions of the Internal Revenue Service in defining the extent to which business expenses are allowed. Employees must ensure expenses are reasonable to avoid the Company incurring unnecessary expenses. These expenses must be approved by the employee's manager and submitted along with receipts in a timely manner. Expenses are subject to regular internal and external audit; therefore, compliance with the policy is essential.

All of Myomo's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect Myomo's transactions and must conform both to applicable legal requirements and to Myomo's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless expressly permitted by applicable law or regulation and the Chief Financial Officer is informed by you in writing of the maintenance of such funds or assets.

Business records and communications (including internal or external e-mails) very often become public, and you should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that can be misunderstood or misconstrued. This policy applies equally to e-mail, messaging applications, internal memos and formal reports. You should always remember that writings or images on your computer screen, screen savers, and pictures or videos you retain or view on your computer screen must comply with the Company's policies including, without limitation, harassment and discrimination. Records should always be retained or destroyed according to Myomo's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation, you must not delete or alter any e-mail that is directly or indirectly related to the subject of the litigation or investigation, or otherwise take any action that could be construed as an effort to obstruct the litigation or investigation. A director or employee who is found to have violated this policy could be subject to criminal penalties, among other things.

21. Document Retention

Myomo has records retention and disposal procedures to ensure that Company records

are maintained, stored, and, when appropriate, destroyed in accordance with Myomo needs and in compliance with applicable legal, regulatory, environmental, tax, employment and trade requirements. You are expected to be familiar with the specific requirements applicable to your position. Regular document destruction must stop immediately if you are aware of a legal request for such documents or if the Legal Department has issued a document hold notice. If an employee is unsure whether a document has been placed under a legal hold, such employee should preserve and protect that document while the Legal Department is contacted.

22. Confidentiality

Subject to the whistleblower protections set forth in Section 3, directors, officers and employees must maintain the confidentiality of confidential information entrusted to them by Myomo, except when disclosure is authorized by Myomo's established written policies or its Chief Executive Officer or required by laws or regulations. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. Confidential information includes all non-public information that might be of use to competitors, or harmful to Myomo, if disclosed, and information that suppliers and other business partners have entrusted to us. The obligation to preserve confidential information continues even after employment ends. In connection with this obligation, every employee is required to execute a confidentiality and proprietary information agreement when he or she began his or her employment with Myomo. Please contact the Chief Financial Officer if you need a copy of your signed confidentiality and proprietary information agreement or if you do not recall signing such an agreement at your hiring. You also must abide by any lawful obligations that you have to your former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

Third parties may ask you for information concerning the Company. Subject to the exceptions noted in the preceding paragraph and the whistleblower protections set forth in Section 3, directors, officers and employees (other than the Company's authorized spokespersons) must not discuss internal Company matters with, or disseminate internal Company information to, anyone outside the Company, except as required in the performance of their Company duties and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning the Company from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders. All responses to inquiries on behalf of the Company must be made only by the Company's authorized spokespersons. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to your supervisor or one of the Company's authorized spokespersons.

23. Protection and Proper Use of Myomo Assets

You should endeavor to protect Myomo's assets and ensure their efficient use. Any suspected incident of fraud or theft should immediately be reported for investigation. Myomo equipment should not be used for non-Myomo business, though limited incidental personal use is permitted.

All Myomo employees are expected to comply with all Myomo policies and procedures regarding the security of information systems.

Your obligation to protect Myomo's assets includes protecting its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business or marketing plans, scientific and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of such information would violate Myomo policy and could also be illegal and result in civil or even criminal penalties.

24. Use of AI and Automated Systems

Myomo may determine that in certain areas it will utilize artificial intelligence (AI) and automated systems to enhance productivity, efficiency, and decision-making processes. Employees may encounter AI-driven tools and technologies in various aspects of their work, such as data analysis, customer service, or workflow automation. It is essential to use AI tools and automated systems responsibly and ethically. Employees are expected to:

- Follow training and guidelines provided by the Company when using AI systems;
- Ensure the accuracy and integrity of data input into AI systems;
- Report any concerns or issues related to AI usage to their manager or the IT department; *and*
- Respect and protect sensitive data and confidential information when utilizing AI technologies.

Unlawful or unethical use of AI tools, such as using AI for harassment, discrimination, recording or analysis of conversations without proper consent or unauthorized data access, will result in disciplinary action, up to and including termination.

25. Trade Issues

Many countries regulate international trade transactions, such as imports, exports and international financial transactions and prohibit boycotts against countries or firms that may be "blacklisted" by certain groups or countries. The Company's policy is to comply with these regulations and prohibitions even if compliance may result in the loss of some business opportunities. Employees should learn and understand the extent to which international trade controls apply to transactions conducted by the Company.

26. Government Requests for Information

Myomo will cooperate fully with any government investigation. From time to time, government regulators may contact employees directly in the course of an investigation. You are free to decide on your own whether you wish to speak with a government investigator, and although we request that you inform the Compliance Officer if you are contacted by one, you are not required to do so. Any information you convey to the agency must be truthful and accurate. No Myomo employee will be retaliated against for conveying truthful and accurate information to a government agency, or for responding in good faith to an inquiry from a government agency without informing the Compliance Officer. Myomo urges you, before sharing any company information with a person who represents himself or herself to be affiliated with a government

agency, to ensure and confirm that the person in fact holds an official government capacity.

27. Waivers of the Code

Waivers of the Code may only be granted by Myomo's Compliance Officer; provided, however, that any waiver of the Code for executive officers or directors may be granted only by the Board of Directors or the Audit Committee of the Board. Any such waiver of the Code for executive officers or directors, and the reasons for such waiver, will be disclosed in Myomo's public filings, as required by law or securities exchange regulations.

28. Reporting Illegal or Unethical Behavior

You are encouraged to talk to supervisors or Human Resources personnel about observed illegal or unethical behavior or when in doubt about the best course of action in a particular situation. Any employee who suspects a violation of this Code, or any law or regulation, should bring the matter to the attention of the Compliance Officer, Human Resources or the Chair of the Audit Committee as soon as possible. It is the policy of Myomo not to allow retaliation for reports of misconduct by

others made in good faith by employees. You are required by Company policy to cooperate in internal investigations of misconduct.

You may, on an anonymous basis, submit a good-faith concern regarding questionable accounting or auditing matters without fear of dismissal or retaliation of any kind by contacting the Chair of the Audit Committee. Contact information is set forth on the Company's web site, and in the Company's proxy statements filed with the SEC.

29. Review of Code

The Board of Directors or the Nominating and Governance Committee shall at least annually review and reassess this Code and submit any recommended changes to the Board for its consideration.

30. Upholding the Standards - Our Commitment and Yours

It is everyone's responsibility to ensure timely and consistent action is taken against any violations of the Code. However, in some situations it is difficult to know if a violation has occurred. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? These questions will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.

- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. It is your supervisor's responsibility to help solve problems.
- Seek help from Myomo resources.

In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question, discuss it with the Compliance Officer, Human Resources, or the Chair of the Audit Committee. You may report legal or ethical violations on a confidential or anonymous basis and without fear of retaliation. Reports may be made anonymously by calling the Compliance Hotline at (844) 954-3345 or by submitting the report via a web intake form: <https://myomo.ethicspoint.com> or via a mobile site: <https://myomomobile.ethicspoint.com>. If your situation requires that your identity be kept secret, your anonymity will be protected to the greatest extent possible. In this regard, Myomo encourages you to draft and send such an emailed report using a non-Company computer, to assist in the protection of your anonymity. Myomo does not permit retaliation of any kind against employees for good faith reports of ethical violations and you should never feel pressured to violate a law or policy. Always seek clarification before taking action. When uncertain, prioritize getting guidance first.

AGREED AND ACCEPTED BY:

NAME:

DATE: