

HEALTHCARE CORPORATE COMPLIANCE

Healthcare Corporate Compliance and Ethics Program

Oyster Point Pharma, Inc. (“Oyster Point” or the “Company”) is committed to maintaining a culture premised on integrity and guided by our values – accountability, collaboration, and trust. Acting with integrity means keeping compliance top-of-mind when making decisions, committing to operating with the highest ethical standards and complying with both the letter and spirit of applicable laws, regulations, and industry code. Maintaining a culture premised on integrity is critical to our mission, our reputation and our long-term business success.

The healthcare compliance and ethics program at Oyster Point (the “Compliance Program”) is built on a foundation guided by the “Healthcare Compliance Program Guidance for Pharmaceutical Manufacturers” developed by the Office of Inspector General (the “OIG Guidance”). Oyster Point’s [Code of Business Conduct and Ethics](#) (the “Code”) sets forth the Company’s commitment to abiding by the applicable laws, rules, and regulations that govern our industry.

In accordance with the OIG Guidance, Oyster Point has tailored its Compliance Program to fit the unique environment of the Company. Because a compliance program should be dynamic and flexible to adapt to the changing environment in which Oyster Point operates, Oyster Point will continually review, assess and enhance its Compliance Program as necessary to ensure that it functions as intended, serves the purposes for which it has been designed and enables Oyster Point to meet its high standards and commitment to compliance.

The following is a summary of the elements of our Compliance Program:

Oversight & Governance

Oyster Point has appointed a Chief Compliance Officer who has responsibility to implement and oversee Oyster Point’s Compliance Program. The Chief Compliance Officer provides regular reports to the Audit Committee of the Board of Directors and senior management. Oyster Point is committed to ensuring the Compliance Officer has appropriate resources dedicated to ongoing development and the authority to exercise independent judgment to effectuate change within the organization as necessary to establish and maintain the Compliance Program.

Policies and Procedures

Oyster Point has established a Code, which is available to all employees as well as publicly on Oyster Point’s corporate website. All employees must read and certify to the Code upon hire and annually thereafter. The Company has further established internal policy and procedure documents to set forth the standards, guidelines and legal requirements that govern the way Oyster Point conducts its business.

Training and Education

The Company’s policies and procedures are further reinforced through a training program that delivers regular and effective compliance education to Oyster Point employees that is relevant to their job function and responsibilities and, where appropriate, to business partners.

Effective Lines of Communication

Oyster Point is committed to promoting a corporate culture where employees feel comfortable raising concerns and asking questions. In most instances, employees should bring questions to their manager. Employees are also encouraged to seek assistance and advice from various departments within the

Company, including the Legal, Compliance and Human Resources departments. If an employee chooses to report potential concerns or violations anonymously, they may do so by calling the Oyster Point AlertLine, available 24 hours a day, 7 days a week at <https://www.OYSTAlertLine.com> or (800) 461-9330. Oyster Point's goal is that all employees, when seeking answers to questions or reporting potential violations, should know who to turn to for a meaningful response and should be able to raise good faith concerns without fear of retaliation.

Auditing & Monitoring

Oyster Point's Compliance team is responsible for monitoring, auditing, and evaluating the Compliance Program. In accordance with OIG Guidance, the nature, extent and frequency of compliance monitoring and auditing varies according to a number of factors, including new regulatory requirements, changes in business practices and other considerations. Oyster Point uses auditing and monitoring to identify and address non-compliance, as well as potential Compliance risks, and take advantage of identified opportunities to enhance processes and practices in order to reduce compliance risks.

Investigations and Enforcement

Oyster Point responds to alleged compliance violations and conducts investigations of such allegations when warranted. Oyster Point will initiate appropriate corrective action and preventative measures to help prevent the recurrence of similar violations. Corrective actions considered by Oyster Point include addressing gaps in policies, practices, training or understanding that may have contributed to a violation; imposing a range of appropriate disciplinary measures, up to and including termination from employment and contract termination.

INTERACTIONS WITH HEALTHCARE PROFESSIONALS IN CALIFORNIA

Interactions with Healthcare Professionals in California

September 1, 2022

Oyster Point's Compliance Program reflects our commitment to comply with laws that are applicable to our business, including the requirements set forth in the California Health & Safety Code §§ 119400-119402 (the "CA Code"). In accordance with the CA Code, Oyster Point has established an annual dollar limit of \$2,500 which applies to promotional items, materials, and certain other transfers of value provided to covered recipients in California. Oyster Point declares based on its knowledge and good faith understanding of the requirements under the CA Code, that as of the date above, it is in all material respects in compliance with the requirements of the CA Code. As of the date of this declaration, Oyster Point believes it is in compliance with its CA Code in all material respects. Notwithstanding the foregoing, this declaration is not intended and should not be construed to imply that the Oyster Point will not or has not identified individual instances in which an employee or agent of the Company has or may have violated one or more provisions of its Compliance Program. If such instances occur, Oyster Point takes reasonable and appropriate corrective action with respect to any actual or potential non-compliance in a manner consistent with its Compliance Program. Oyster Point makes this declaration, in good faith, in the absence of clarifying regulations or guidance from the State of California.

To request a copy of the Compliance Program or this declaration, please email: compliance@oysterpointrx.com or call (855) 992-2468 and leave a message with the required information to allow us to respond to the request.