COMPASS Pathways plc

CODE OF BUSINESS CONDUCT AND ETHICS

Message from our Chief Executive Officer

Managing our business with honesty and integrity and treating each other fairly underpins each of Compass's values. We all need to act ethically and conduct ourselves in a way that gains the trust and confidence of our stakeholders, including our patients, our fellow team members, our partners, customers, suppliers, shareholders, and regulators.

Demonstrating our credibility and building trust with these stakeholders is critical to our mission. We are pioneers, building the future of mental health care. This entails generating evidence, advancing science, and creating new pathways to bring better treatment options to people who are suffering the often invisible, but profoundly debilitating effects of mental health conditions.

Ethical decision making and complying with both the spirit and letter of the law are essential to earning and keeping the trust of the people we work with and serve. The Compass Code of Business Conduct and Ethics helps us to do this by outlining the basic principles that should guide our behaviour and decisions.

Our reputation and our success depend on everyone who represents Compass upholding ethical standards of behaviour and maintaining the highest quality standards in everything we do.

Every team member needs to know, understand, and comply with the Code.

Thank you for embracing our values in all you do at Compass and for taking collective responsibility for creating a brighter, healthier future for the people we seek to serve.

Kabir Nath
Chief Executive Officer, Compass Pathways

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1. Introduction

At COMPASS Pathways plc (together with its subsidiaries, the "Company" or "Compass"), we are dedicated to accelerating patient access to evidence-based innovation in mental health. We are motivated by the need to find better ways to help and empower people with serious mental health conditions who are not helped by existing treatments. Our Code of Business Conduct and Ethics (the "Code") sets out our ethical principles and the high standards that guide how we work. These standards focus us on acting ethically and gaining the trust and confidence of those with whom we work. Following the Code will mean that we can make good choices and take personal accountability for our actions.

The purpose of this Code is to provide guidance to help you recognize and address ethical and legal issues, provide mechanisms to report unethical or illegal conduct, and foster a culture of honesty and accountability. Dishonest, unethical or illegal conduct will constitute a violation of this Code, regardless of whether such conduct is specifically referenced herein.

The Code cannot cover every situation that may arise, but it sets out essential principles and the minimum standards of conduct that we expect. You must use good judgement in everything you do and will need to ask for help if you are unsure. The Code is complemented by more detailed policies, procedures and training and should be read in conjunction with the Company's other policies and procedures adopted from time to time, including, but not limited to, the (i) Foreign Corrupt Practices Act, Bribery Act and Anti-Corruption Policy, (ii) Conflicts of Interest Policy, (iii) Insider Trading Policy, (iv) Corporate Communications Policies and Procedures, (v) Information Security Policy and (vi) policies and procedures governing interactions with healthcare professionals. The Code does not replace other legal or contractual obligations that may be relevant to Compass and/or our business.

Our Code applies broadly to those who work for or represent Compass or any of its subsidiaries. This includes our Board of Directors (the "Board"), our leadership team, our employees and our designated consultants or contractors. We all need to read and understand the Code. We will make a copy of the Code available to you and periodically you will be asked to review the Code and sign an acknowledgment of that review. This includes Code updates that will be provided from time to time. You will also receive periodic training on the contents and importance of the Code and our other policies and procedures. It is important for you to understand Compass's commitments relating to ethics and compliance.

The Company will take appropriate action to monitor and enforce compliance with the standards of the Code. Failure to comply with the Code could cause reputational damage to Compass and may result in disciplinary action for you, up to and including termination of your employment in some circumstances.

2. Reporting Procedures

Compass is committed to a Speak Up culture, where everyone can raise questions and report improper or unethical conduct, and to investigating reported concerns. This is important as misconduct or non-compliance undermines our reputation, impacts the success of our organisation and may have serious legal or business implications.

Seeking Guidance. The best starting point for you to seek advice on ethics-related issues, compliance with the Code or other Company policies will usually be your supervisor. However, if the conduct in question involves your supervisor, if you have reported the conduct in question to your supervisor and do not believe that he or she has dealt with it properly, or if you do not feel that you can discuss the matter with your supervisor, you should raise the matter with the Compliance Officer, who is identified below.

Reporting a Concern. If you have a concern, or if you become aware of any actions that would violate the Code, any law or regulation, it is your responsibility to speak up promptly. You should contact the Company's Associate General Counsel, Securities, who has been designated by the Board as the Compliance Officer for the implementation, interpretation and administration of this Code. Alternatively, you can use the Speak Up Webform or Hotline which is available 24/7. The Speak Up process is secure and confidential and is managed by an independent company. Compass takes precautions to protect the confidentiality of anyone using the Speak Up Webform or Hotline. Details can be found here, and reports may be made via phone or in writing. The Speak Up Webform and Hotline should only be used to report concerns that involve the Code or improper or unethical conduct.

Concerns relating to accounting, internal accounting controls, auditing matters, or a potential violation of federal securities, anti-bribery or anti-corruption laws may be reported directly to the Board's Audit and Risk Committee in accordance with the procedures established by the Audit and Risk Committee for receiving, retaining and treating complaints regarding these matters. You may communicate with the Audit and Risk Committee or its designee:

- in writing to: Chairperson of the Audit and Risk Committee, c/o 3rd Floor, 1 Ashley Road, Altrincham, Cheshire, United Kingdom WA14 2DT; or

- by phoning the Speak Up Hotline and asking that the matter be forwarded to the Chairperson of the Audit and Risk Committee.

Whilst Compass encourages open reporting that allows you to be contacted to obtain further information, should you wish to raise your concern through the Speak Up Webform or Hotline without identifying yourself, you will be able to do so anonymously (subject to applicable laws, rules or regulations, or to any legal proceedings).

Compass has a non-retaliation policy that expressly forbids retaliation against anyone who reports suspected misconduct when they are acting in good faith on the basis of a reasonable belief. Any person who participates in any such retaliation is subject to disciplinary action, including termination.

3. Governance of the Code

Oversight. The Board oversees the Code through the Audit and Risk Committee, which is responsible for monitoring compliance with the Code by reviewing reports of non-compliance and when appropriate, imposing and enforcing appropriate disciplinary measures for violations.

Amendments. The Code has been approved by the Board and is subject to periodic review by the Audit and Risk Committee. All amendments or updates to the Code must be approved by the Board or any authorized committee of the Board.

Waivers. Requests for a waiver of a provision of the Code must be submitted in writing to the Compliance Officer for appropriate review. For employees and those acting on behalf of Compass who are not directors or executive officers, any waivers of the Code must be approved by the Audit and Risk Committee. Waivers of any provision of the Code for a director or an executive officer must be approved by the Board. Executive officers include Compass's principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions.

Any amendments or waivers may be publicly disclosed if required by applicable laws, rules and regulations.

The Code applies in its entirety to all of the Company's Board members, officers, employees and designated consultants or contractors, as stated above. However, only the following sections constitute the Code of Ethics for the purposes of the rules of the Securities and Exchange Commission ("SEC") and Nasdaq listing standards: Introduction; Reporting Procedures; Compliance with Laws and Regulations; Conflicts of Interest; Honest and Ethical Conduct and Fair Dealing; Public Reporting and Disclosure Obligations.

4. Our Working Environment

Bullying & Harassment. Compass believes in the right to be treated with dignity at work and does not tolerate bullying or harassment of any kind, whether this is face-to-face, verbal, written, or electronic, by one person or a group, inside or outside of Company premises.

Equal Opportunities. Compass is committed to providing equal opportunities and does not tolerate discrimination based on age, gender, race, sexuality or any other protected characteristic.

Occupational Health & Safety. Compass is committed to creating a safe and healthy workplace. We aim to achieve this by assessing, preventing and controlling health and safety risks that arise from our activities. Each one of us must take responsibility for our own health and safety, and that of our colleagues.

5. Compliance with Laws and Regulations

We are all responsible for ensuring we comply with the law and our policies when we are conducting Company business. The Company operates internationally and is subject to laws, rules and regulations in the U.S., U.K. and in other jurisdictions that affect our operations, research, development, testing, manufacture, and marketing of our products and product candidates, among

others. These laws include regulations promulgated by the U.S. Food and Drug Administration (FDA) and similar agencies in other countries, laws governing the pharmaceutical industry, U.S. securities laws, the Controlled Substances Act of 1970 in the U.S. and comparable laws governing controlled substances in other jurisdictions in which we operate, the U.S. Foreign Corrupt Practices Act (FCPA), U.K. Bribery Act and similar anti-bribery and anti-corruption laws in the jurisdictions in which we operate, antitrust and competition laws, trade controls, sanctions and export control laws, environmental, health and safety laws, U.K. laws relating to corporate actions and duties owed by corporate directors and officers, and laws relating to human rights and modern slavery.

Compass may receive monetary support directly or indirectly through contracts or grants from various government entities in support of our discovery, development, and research activities. We are committed to complying with legal requirements associated with government contracts and funding. We are also committed to cooperating fully with government agencies conducting inspections and investigations.

We follow laws, regulations, codes, and guidelines related to safety, quality, research, and bioethics to deliver work that is not only legally, but also ethically, justified. We are dedicated to patient safety during our clinical trials and, as applicable, following approval of our products. We maintain procedures to help ensure the safety, efficacy, and quality of our investigational and approved products, follow relevant informed consent procedures, and promptly report adverse events, product complaints, and other safety or quality concerns through designated Company channels.

Healthcare laws govern our interactions with patients, healthcare professionals, institutions, payers, government bodies, and other stakeholders with whom we work. Although these laws can be complex, we are guided by a consistent set of principles. We act in ways that benefit patients and support the quality of healthcare services, while respecting the independent medical judgment of healthcare professionals. We present and promote our medicines in a manner that is truthful, and not misleading, medically accurate, appropriately substantiated, and fair and balanced with respect to safety and efficacy. We do not use any interaction, program, payment, service, grant, donation, or other item of value to improperly influence prescribing, referral, formulary, reimbursement, purchasing, or medical decision-making, and we help safeguard government and private healthcare programs against fraud and abuse.

As we prepare for and conduct commercial activities, we must follow applicable Company review and approval processes for promotional, educational, medical, market access, patient support, and other external-facing materials and activities. We must also maintain appropriate separation between promotional and non-promotional activities and seek guidance when we are uncertain which rules apply.

Patient assistance, reimbursement support, disease education, and other patient or caregiver support programs must be designed and operated to support appropriate access, education, and use of our products, and not to induce product use or interfere with the independent judgment of healthcare professionals or patients.

We comply with laws and regulations relating to privacy matters and personal data protection. Compass is entrusted with the personal information of various parties, including our

employees, clinical trial participants and investigators, employees or principals of our business partners, and other individuals with whom we come in contact. Compass requires that employees follow our policies and procedures for safeguarding proprietary information, confidential information, personal data or Personally Identifiable Information (PII).

6. Anti-Bribery and Anti-Corruption

The Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. You should not 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. You must fully comply with all anti-corruption laws of the countries in which the Company does business, including the U.K. Bribery Act and the FCPA, which apply globally. Violation of U.K. Bribery Act or the FCPA could subject the Company and its individual directors, officers, employees and designated consultants, among others, to serious civil and criminal penalties.

7. Gifts and Hospitality

You should not accept business gratuities or gifts (including entertainment) from competitors, partners, vendors, service providers or suppliers of the Company or anyone else having or seeking business with the Company (or with whom the Company is seeking to do business), except as permitted below. Cash, gift cards and gift certificates are not acceptable business gratuities or gifts and may not be given nor received by Compass employees, nor anyone working on our behalf, in connection with our business. While receiving gifts of nominal value (other than cash, gift cards and gift certificates) is acceptable, anything worth more than a nominal amount must not be accepted. Accepting any gratuity, gift or offer of entertainment of any value is prohibited if it creates even the appearance of impropriety.

There are strict laws, regulations and rules that apply to providing business gratuities or gifts (including entertainment) to government employees and health care professionals, which are covered in our gift and hospitality policies.

8. Corporate Opportunities

You owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. You are prohibited from diverting to yourself, or to others, any opportunities that are discovered through the use of Compass's property or information, or as a result of your position with Compass, unless that opportunity has first been presented to, and rejected, by Compass. You are also prohibited from competing with Compass or using Compass's property or information, or your position, for improper personal gain.

9. Conflicts of Interest

Compass is committed to ethical behaviour and decision-making free from outside influences. All decisions need to be in the best interests of Compass.

A conflict of interest occurs when a person's actions, ability to make decisions or ability to perform their responsibilities is influenced, or has the perception of being influenced, by a personal

interest. This might include working or conducting business with someone with whom you, or a family member, have a close personal relationship, investing in one of our competitors, partners, vendors, service providers, or suppliers, or owning or working for a company that competes, does business, or wants to do business with Compass.

Compass requires anyone who works for or represents Compass to declare any actual or potential conflicts of interest they have to the Compliance Officer. The Board or the Nominating & Corporate Governance Committee may then be notified. Actual or potential conflicts of interest involving members of the Board, officers or the Compliance Officer are required to be disclosed directly to the Nominating & Corporate Governance Committee. In addition, members of the Board also have duties under the U.K. Companies Act 2006 to declare to the other directors the nature and extent of his or her interest in proposed or existing transactions or arrangements with the Company.

10. Accepting External Roles

Any outside activities or roles must not impair or interfere with the performance of your duties to Compass or your ability to act in Compass's best interests. Outside activities that create a potential or actual conflict of interest may result in a loss of impartiality, impairment of judgment, and interference with legitimate interests of our organisation.

If you wish to accept an additional position, whether advisory or paid, in a non-profit or for-profit organisation, prior permission from the Compliance Officer is required, and Company executives may be informed. Additional rules apply for members of the Executive Team. For Company executives, prior permission is required from the CEO and the Nominating and Corporate Governance Committee will be informed. Should the CEO wish to accept a role with another entity, prior permission is required from the Nominating and Corporate Governance Committee.

These decisions are at the sole discretion of the approver or approving body and may include conditions to address any potential conflicts of interest.

11. Communications Principles

External Communications. You are responsible for what you communicate both inside and outside of the workplace. You should always use good judgment before posting on social media and never share confidential information about Compass or any confidential information of a third party that you learned of as a result of your position with Compass. To ensure our external communications are appropriate, only designated spokespersons are authorized to make official Company communications, including communications via social media. These communications need to be pre-approved and must comply with applicable communications, insider trading, and other policies. If you are approached by the media, market professionals, investors or potential investors for comment or information about Compass or our business (including about any of our business partners), do not volunteer information and please contact the SVP, Investor Relations for investor-related inquiries or the VP, Communications for all other inquiries.

Investor Communications. Communications to investors by the Company and Company personnel are highly regulated, including under U.S. securities laws. Our investor relations

function manages communications between ourselves, the financial community, and other organisations. You should not communicate directly with investors or potential investors, as noted above.

12. Company Assets, Information, Intellectual Property and Data

Compass is committed to protecting our valuable assets and information. You are entrusted with the appropriate use and preservation of a wide range of our organisation's assets and you must use these resources exclusively for work-related activities and protect them from theft, contamination, damage, misuse or use by unauthorised parties. You should never use Compass assets or information for personal gain.

Confidential Information. Sharing any confidential, proprietary information with competitors, the public, or even friends or family may be a violation of law and can seriously damage Compass's competitive position, legal standing and reputation. You must take precautions to protect our confidential information and the confidential information entrusted to us by individuals outside Compass and other companies. For example, you may not use confidential information about Compass or a third party learned through your position or relationship with Compass to participate in prediction markets or similar event-based contracts, regardless of whether the information is material under applicable securities laws. You must also abide by any obligations that you have to any former employer.

Intellectual Property. Compass's intellectual property (IP) is a cornerstone of our present and future success. Our IP includes patents, trade secrets, technology training content, trademarks, copyrights, design rights, domain names and logos. You must take positive steps to protect Compass's IP. We also respect the hard work of others and the ownership rights they have in their intellectual property. You are not permitted to use or incorporate the intellectual property of others on behalf of the Company without an appropriate license.

Information and Cyber Security. Compass is committed to protecting our information and information systems from unauthorised access and use. We are all responsible for using technology appropriately, including artificial intelligence, and must follow our information security and cybersecurity processes and practices to protect our networks, computers, programmes and data from attack, unauthorised access, and damage.

Data Integrity and Data Accuracy. Data integrity and accuracy is essential to Compass's processes and our ability to meet legal and regulatory obligations, particularly when we report financial information to our regulators and to our shareholders. Our financial statements must conform to generally accepted accounting rules and our own accounting policies.

In addition, our research data must be legible and accurate, among other requirements. Pharmaceutical regulators rely on our data when they assess whether our product candidates and processes are safe and effective and whether our underpinning evidence base is sound.

All Compass employees, and anyone working on our behalf, are responsible for maintaining the integrity of data in all parts of our business and ensuring there are appropriate records in place to demonstrate that our data is accurate. Records must be maintained in accordance

with all applicable regulations and standards and accurately reflect the true nature of transactions and activities.

13. Honest and Ethical Conduct and Fair Dealing

Compass is committed to dealing honestly, ethically, and fairly with third parties. Compass only seeks competitive advantages through superior performance and never through unethical or illegal business practices.

Compass prohibits stealing proprietary information, possessing trade secret information obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies.

You must respect the rights of, and deal honestly, ethically, and fairly with, our competitors, partners, vendors, service providers, suppliers, customers, payers, distributors, specialty pharmacies, and other commercial or access stakeholders. Statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice.

14. Grants and Donations

Grants and donations are funds, benefits-in-kind or services given without charge to the recipient and without expecting anything in return. Compass supports legitimate causes that are aligned with our objectives and strives to be transparent when we authorise grants and donations. We do this by ensuring there are robust supporting approval processes. You may not commit to providing grants and donations on behalf of Compass without going through the proper processes, which are outlined in further detail in our Grants and Donations Policy.

15. Political Activity and Lobbying

Compass works ethically with governments and officials. We recognise that lobbying on behalf of Compass is permitted, but this activity is highly regulated by laws and regulations. To ensure the highest standards, corporate contributions or political activities are reviewed and endorsed at the Executive or Board level, as appropriate.

Employees are encouraged to participate in the political process as individuals. You must do this in your own time, and at your own expense. You must never suggest that you are speaking or lobbying on behalf of Compass without formal authorisation. Compass resources must not be used for political contributions or in support of any political party, candidate, or activity.

16. Insider Trading

Compass is committed to preventing insider trading. Insider trading occurs when securities are bought or sold based on material, non-public information, which is information that a

reasonable investor might consider important in making an investment decision or that alters the total mix of information in the marketplace about a company.

In simple terms, material information is any type of information that could reasonably be expected to affect the market price of Compass securities or the securities of another company. Buying or selling Compass securities, or securities of another company, while in the possession of this material, non-public information gives you an unfair advantage over other shareholders and potential shareholders and is considered insider trading. "Tipping" or passing material, non-public information to another person so that they may purchase or sell securities is also considered insider trading.

In the course of your daily work, you have access to a variety of information not known to the general public that concerns Compass and/or other companies with which we do business or are involved in a potential transaction or business relationship. This includes information about financial results or forecasts, clinical trial results, communications with regulatory agencies, executive-level personnel changes, and mergers or acquisitions. You are a trustee of that information, and have a responsibility to keep it "inside," or private, until it is disclosed officially via a public filing or announcement by authorised Compass personnel, such as an SEC filing or press release.

Some individuals who are "designated insiders" have access to material, non-public information on a routine basis due to their role. Specific trading procedures are in place for these individuals, their family members, and investment partners.

Following Compass's Insider Trading Policy will help to ensure that you are not engaged in prohibited insider trading and avoid even the appearance of an improper transaction. If you are uncertain about the constraints on your purchase or sale of any securities, you should consult with the Compliance Officer.

17. Public Reporting and Disclosure Obligations

Financial Reporting and Disclosure Obligations. The Company is committed to providing its shareholders with complete and accurate information about its financial condition and results of operations as required by U.S. securities laws, the U.K. Companies Act 2006, Nasdaq's listing standards, and other applicable laws and regulations. The Company's reports and documents it files with or submits to the SEC and the U.K. Registrar of Companies, and any earnings releases and similar public communications made by the Company, must include legally compliant, full, fair, timely and understandable disclosure. Directors, officers, employees and others who are responsible for these filings must use reasonable best judgment and perform their responsibilities honestly, ethically and objectively in order to ensure the integrity and accuracy of the Company's financial reports and public disclosures. Our financial statements, any reports or documents submitted to the SEC or the U.K. Registrar of Companies, earnings releases and any public statements about our business and financial status must be true, accurate and not misleading.

Accuracy of Records. All Company books, records and accounts must be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of

the transactions they record. The financial statements of the Company must conform to applicable accounting rules and standards, and the Company's accounting policies. No false or misleading entries may be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property may be made without adequate supporting documentation. All business transactions must be honestly and accurately reported and everyone is responsible for the accuracy of their records and reports.

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Adopted as of November 2, 2026

ACKNOWLEDGMENT

I acknowledge that I have reviewed and understand Compass Pathways plc's Code of Business Conduct and Ethics (the "**Code**") and agree to abide by the provisions of the Code.

_____

Signature

_____

Name (Printed or typed)

_____

Position

_____

Date