

CORINDUS VASCULAR ROBOTICS, INC.
RELATED PARTY TRANSACTIONS POLICY

The Board of Directors (the “Board”) of Corindus Vascular Robotics, Inc. recognizes that transactions involving related parties present a heightened risk of conflicts of interest (or the perception thereof) and therefore has adopted this Related Party Transactions Policy (the “Policy”) which shall be followed in connection with all related party transactions involving Corindus Vascular Robotics, Inc. and its subsidiaries and affiliates (“Corindus” or the “Company”).

Board or Audit Committee Approval

The Board has determined that the Company’s Audit Committee (the “Committee”) shall review and make a recommendation to the Board for approval or disapproval of, or approve or disapprove themselves as appropriate, all Related Party Transactions (as such term is defined below) and any material amendments to such Related Party Transactions. The Board may determine that a particular Related Party Transaction or a material amendment thereto shall instead be reviewed and approved by a majority of directors disinterested in the Related Party Transaction. No director shall participate in any approval of a Related Party Transaction for which the director is a Related Party (as such term is defined below), except that the director shall provide all material information concerning the Related Party Transaction to the Committee.

The Committee shall review the material facts of all Related Party Transactions that require the Committee’s approval or recommendation. If advance Committee approval of a Related Party Transaction is not feasible, then the Related Party Transaction may be considered and, if the Committee determines to be appropriate, ratified at the Committee’s next regularly scheduled meeting or a special meeting of the Committee. In determining whether to approve, recommend or ratify a Related Party Transaction, the Committee will take into account, among other factors it deems appropriate, (i) whether the transaction is fair to the Company, (ii) whether the Committee has all of the material facts regarding the transaction or parties involved, (iii) whether the transaction is generally available to an unaffiliated third-party under the same or similar circumstances and cost, and (iv) the extent of the Related Person’s interest in the transaction.

Management Report

The Committee may request that the Chief Executive Officer of the Company (i) provide to the Committee, on a quarterly basis, a summary of all payments made by or to the Company in connection with duly approved Related Party Transactions during the preceding fiscal quarter and (ii) review all payments made by or to the Company in connection with duly approved Related Party Transactions and certify to the Committee that any payments made by or to the Company in connection with such Related Party Transactions have been made in accordance with the Company’s policy and the terms and conditions of the documents evidencing the relevant Related Party Transactions.

Disclosure

All Related Party Transactions shall be disclosed in the Company's applicable filings with the Securities and Exchange Commission to the extent required by the Securities Act of 1933, as amended, and the Securities Exchange Act of 1934, as amended, and related rules and regulations. Furthermore, all Related Party Transactions of which management is aware shall be disclosed to the Committee. At least annually, management shall elicit information from the Company's executive officers and directors as to existing and potential Related Party Transactions and shall seek to obtain such information from 5% shareholders who do not file reports with the SEC on Schedule 13D or Schedule 13G. An executive officer or director shall promptly inform the Chairman of the Committee when the executive officer or director becomes aware of a potential Related Party Transaction in which the executive officer or director would be a Related Party.

Definitions

A "Related Party Transaction" means a transaction or series of transactions (including any financial transaction, arrangement or relationship (including any indebtedness or guarantee of indebtedness) in which the Company was, is or will be a participant and in which any Related Party had, has or will have a direct or indirect interest and that would be required to be disclosed pursuant to Securities and Exchange Commission Regulation S-K, Item 404 or any other rules or regulations, as then in effect. For the avoidance of doubt, the following transactions are not considered Related Party Transactions:

1. transactions where the rates or charges involved therein are determined by competitive bids;
2. transactions involving services as a bank depository of funds, transfer agent, registrar, trustee under a trust indenture, or similar services; or
3. transactions in which the interest of the Related Party arises solely from the ownership of a class of the Company's equity securities and all holders of that class receive the same benefit on a pro rata basis.

"Related Party" means a person as indicated below, or an entity owned by such person:

1. an "executive officer" of the Company (as defined in Rule 405 promulgated under the Securities Act of 1933, as amended, and Rule 3b-7 promulgated under the Securities Exchange Act of 1934, as amended);
2. a director of the Company or a nominee for director of the Company;
3. a person (including any entity or group) known to the Company to be the beneficial owner of more than 5% of any class of the Company's voting securities (a "5% shareholder"); or
4. a person who is an "immediate family member" of an executive officer, director, nominee for director or 5% shareholder of the Company.

“Immediate Family Member” means a person’s child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and a person (other than a tenant or employee) sharing the household of the specified person.

This Related Party Transactions Policy was adopted by the Company’s Board on October 17, 2014 and revised on April 30, 2015 and March 6, 2019.

/s/ David W. Long
David W. Long, Corporate Secretary