



## Shockwave Medical, Inc.

### Code of Business Conduct and Ethics

A Message from Shockwave's Chief Executive Officer:

Our values and our Code of Business Conduct and Ethics serve as our guides to conducting business with the highest integrity and the highest ethical standards. Our values reflect Shockwave's culture and help to ground us by guiding our day-to-day interactions with customers and colleagues. Similarly, our Code of Business Conduct and Ethics and related policies provide important guidance to conduct our daily affairs.

The Code of Business Conduct and Ethics applies to all employees and directors of Shockwave. As a team, we have worked very hard to build a successful and well-respected company. We simply cannot - and will not - tolerate unethical or inappropriate behavior.

If you have a question or concern about what constitutes proper conduct for you or anyone else, you may always talk to your supervisor or Shockwave's Legal Department at [legal@shockwavemedical.com](mailto:legal@shockwavemedical.com). You may also report possible violations by calling the Shockwave Ethics Hotline at 1-844-783-5397 or via the internet at [www.shockwavemedical.ethicspoint.com](http://www.shockwavemedical.ethicspoint.com), where you can also find additional options for international reporting via telephone or the internet.

Now more than ever, building a great company requires an unwavering commitment to the highest ethical standards. Each of us is accountable for doing the right thing.

Sincerely,

Doug Godshall  
President and Chief Executive Officer  
Shockwave Medical, Inc.

## Table of Contents

### Contents

<b>Introduction</b> .....	5
1) Introduction .....	5
a) Scope .....	5
b) Purpose .....	5
c) Guidelines for Ethical Decision-Making .....	5
d) Employee Responsibilities .....	6
e) Manager Responsibilities .....	7
f) Consequences of Violations of this Code of Conduct .....	7
g) Internal Investigations .....	7
h) Anonymity & Confidentiality .....	8
i) Making False Accusations .....	9
2) Government Request & Subpoenas .....	9
3) Waivers of this Code of Conduct .....	9
Contact Information for Reporting .....	10
<b>Ethical Practices</b> .....	<b>11</b>
4) Conflicts of Interest .....	11
a) General .....	11
b) Disclosure .....	11
c) Examples .....	11
d) “Related Person” Transactions .....	12
5) Anti-Corruption/Anti-Bribery .....	13
6) Anti-Kickbacks .....	13
7) Fair Dealing with Customers, Suppliers and Competitors .....	13
8) Competitive Intelligence .....	14
9) Antitrust & Fair Competition .....	14
a) General Policy .....	14
b) Interactions with Competitors .....	14
c) Other Prohibited Practices .....	15
10) Insider Trading .....	15
11) Anti-Boycott .....	15
12) Trade Compliance .....	16
13) Anti-Money Laundering .....	16
a) General .....	16

b)	Lists Potential Warning Signs of Money Laundering .....	16
14)	Fraud .....	17
	<b>Our Workplace .....</b>	<b>18</b>
15)	Discrimination & Harassment Prevention .....	18
a)	Discrimination .....	18
b)	Harassment .....	18
16)	Non-Retaliation .....	19
a)	General .....	19
b)	Definition of “Good Faith” .....	20
c)	Self-Reporting .....	20
d)	Victims of Retaliation .....	20
17)	Diversity & Inclusion .....	20
18)	Substance Abuse/Drug and Alcohol-Free Workplace .....	20
19)	Workplace Safety and Health .....	20
20)	Workplace Violence .....	21
21)	Human Rights & Fair Labor .....	21
	<b>Proper Recordkeeping .....</b>	<b>22</b>
22)	Maintaining Accurate Financial Records/Internal Accounting Controls .....	22
a)	General .....	22
b)	List of Unacceptable Activities .....	22
c)	Employee Responsibilities .....	22
23)	Records Management .....	23
a)	General .....	23
b)	Employee Responsibilities .....	23
24)	Data Privacy .....	23
a)	Third-Party Data .....	23
b)	Employee Information .....	24
c)	Privacy Laws .....	24
	<b>Protection of Shockwave Assets .....</b>	<b>25</b>
25)	Protection of Confidential Information .....	25
a)	General .....	25
b)	Handling of Material Non-Public Information .....	25
26)	Protection of Intellectual Property .....	26
27)	Protection of Shockwave Assets & Resources .....	26
	<b>Proper Communications .....</b>	<b>27</b>
28)	Communicating with External Parties .....	27

29)	Social Media .....	27
30)	Healthcare Professional Interactions .....	27
31)	Product Quality .....	27
32)	Marketing and Advertising .....	28
33)	Proper Use and Protection of Electronic Communications .....	28
	<b><i>The Environment and Society</i></b> .....	<b>29</b>
34)	Social Responsibility .....	29
35)	Environmental Stewardship .....	29
	<b><i>Third Parties and Procurement</i></b> .....	<b>30</b>
36)	Selection and Use of Third Parties .....	30
	a) General .....	31
	b) Procurement Practices .....	30
	c) Prohibited Conduct .....	30
37)	Government Customers/Contracting .....	31
	<b><i>Gifts and Entertainment; Political Activity; Charitable Donations</i></b> .....	<b>32</b>
38)	Gifts & Entertainment .....	32
39)	Political Activity/Lobbying .....	32
	a) Personal Political Activity with Ethical Guidelines .....	32
	b) Company Political Contributions .....	33
40)	Charitable Contributions .....	33
	a) General .....	33

## ***Introduction***

### **1) Introduction.**

a) **Scope:** Our Code of Business Conduct and Ethics (this “**Code**”) reflects who we are and what’s important to us at Shockwave Medical, Inc. (“**Shockwave**”). This Code builds upon our shared values and we’re counting on everyone at Shockwave, including the Board of Directors and all officers and employees of Shockwave and its subsidiaries (regardless of where located) to follow this Code and make decisions to uphold our values. We expect that our contractors and temporary colleagues will also follow this Code, as applicable to them. By incorporating these values in all we do, we’ll build trust and strengthen relationships, with each other and our customers. Each of us has a responsibility to know the Code and its policies, to take them to heart, and use them in our daily job functions.

b) **Purpose:** Shockwave is built upon a foundation of strong corporate values and business practices. Our standards of business conduct serve as an important resource for employees in support of day-to-day decision-making. This Code represents the core of our values and how we create the solid foundation of trust and success that is reflected in our relationships with customers, suppliers, stockholders, and each other. This Code is designed to deter unethical behavior and to promote:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- full, fair, accurate, timely, and understandable disclosure in reports and documents we file with regulatory agencies and in our other public communications;
- compliance with applicable laws, rules, and regulations;
- the prompt internal reporting of violations of this Code; and
- accountability for adherence to this Code.

Use this Code as a guide. While this Code is comprehensive, many of the principles described in this Code are general in nature, and the Code does not cover every situation that may arise. Use common sense and good judgment in applying this Code. If you have any questions about applying the Code, it is your responsibility to seek guidance. This Code is not the sole source of guidance and information regarding the conduct of our business. You should consult applicable policies and procedures in specific areas as they apply, and you can always reach out to Shockwave’s Legal Department for further guidance ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)).

c) **Guidelines for Ethical Decision-Making:** When making a decision, as yourself the following questions. If you answer “yes” to all of these questions, it’s likely safe to move forward. If your answer is “no” or “not sure,” to any of these questions, you should not take such action:

- Is this action legal, ethical, and socially responsible?

- Does this action comply with both the spirit and the letter of this Code?
  - Will this action appear appropriate?
  - Is it clear that Shockwave would not be embarrassed or compromised if this action were to become known within Shockwave or publicly?
- d) **Employee Responsibilities:** As a Shockwave employee, you are expected to exhibit the following:
- *Show Commitment:* Show a commitment to our values through your actions.
  - *Promote Compliance:* Promote an environment where compliance is expected, and ethical behavior is the norm.
  - *Understand this Code:* Understand and comply with both the letter and the spirit of this Code and Shockwave's other policies and procedures. This includes refusing any other person's request that you break the law, or going against Shockwave's values, policies, or procedures.
  - *Comply with Laws and Regulations:* Be aware of, and never intentionally violate, relevant laws and regulations. You should also understand that violations of laws or regulations may also result in legal proceedings and penalties, including, in some circumstances, civil and criminal penalties that could affect you personally in addition to a risk of adverse consequences to Shockwave. You should also be alert to changes in the law or new requirements that may affect your business unit.
  - *Seek Guidance:* Seek guidance if you have questions or concerns relating to this Code or otherwise.
  - *Cooperate:* Cooperate fully in any investigation of suspected violations of the Code that may arise in the course of your employment.
  - *Certify:* Provide, periodically upon request, a written certification that you have reviewed and understand this Code, comply with its standards, and are not personally aware of any violations of the Code by others. This certification is your pledge to live up to this Code and its expectations and promptly raise concerns about any situation that you think may violate our Code.

## Q&A

**Question:** There are so many different laws and regulations to follow, am I expected to know all of them? I am not a lawyer.

**Answer:** As a Shockwave employee, you have an obligation to understand all responsibilities of your job and adhering to this Code is included. Do not hesitate to contact Shockwave's Legal Department for help. If something seems out of place or you are ever uncertain, ask before taking any actions.

- e) **Manager Responsibilities.** Given their leadership role with Shockwave, managers must:
- be ethical role models for all employees;
  - exemplify our corporate values and exhibit the highest standards of integrity;
  - communicate the seriousness of Shockwave’s expectations for ethical conduct and their own personal support of these expectations by holding everyone accountable for making sound ethical judgments;
  - be alert to any situations or actions that may be unethical or potentially damaging to our reputation and take prompt action to address such situations or actions; and
  - be careful to avoid even the appearance of implicit approval of unethical or potentially damaging situations or actions.

#### Q&A

**Question:** What should I do if my manager asks me to perform a task that I think might violate this Code or the law?

**Answer:** You can raise your concerns directly with your manager if you feel comfortable. If not, you can reach out to Shockwave’s Human Resources Department or Shockwave’s Legal Department, or report the issue through Shockwave’s Ethics Hotline. See “*Contact Information for Reporting*” below for more details.

- f) **Consequences of Violations of this Code of Conduct.** Employees who take any of the following actions (or other comparable actions) are subject to disciplinary action up to and including termination of employment:
- violating this Code, other Shockwave policies and procedures, or relevant laws and regulations or encouraging others to do so;
  - knowingly making or referring a false allegation to management or any third-party;
  - deliberately providing false information;
  - refusing to cooperate in an investigation;
  - retaliating against any person that reports in good faith a potential violation of the Code; or
  - if you are a manager, failing to take appropriate actions after receiving a report of a suspected violation of this Code.

g) **Internal Investigations.** If a suspected violation of this Code, other Shockwave policies and procedures, or applicable laws and regulations has occurred, our General Counsel’s office has established

processes and procedures for conducting internal investigations. These processes and procedures include the following list:

- Any internal investigations shall be conducted by qualified personnel trained to conduct investigations lawfully, promptly, thoroughly, professionally, fairly, and confidentially.
- Employees should not interfere in internal investigations or engage in their own fact-finding. Rather, you should promptly raise ethics and compliance questions and immediately report suspicious behavior.
- Employees and others involved in internal investigations will be treated with dignity and respect.
- All investigations and any resulting corrective action will be conducted in compliance with local law, applicable Shockwave policies, and any other requirements.
- All employees are expected to cooperate in internal investigations, audits, accounting reviews, or directions from outside counsel in connection with lawsuits or government investigative proceedings.
- Searches of company-provided physical and information technology resources may be required.
- Retaliation will not be tolerated against any employee who cooperates in investigations, audits, accounting reviews, lawsuits or government investigative proceedings, or any similar activities. If you think you are being retaliated against or that an investigation is being conducted inappropriately, you should report it immediately using any of the reporting avenues available to you.
- After an investigation is completed, appropriate disciplinary and other corrective action will be taken when warranted by the facts.
- When legally required or otherwise appropriate, Shockwave's General Counsel will timely self-report compliance violations to applicable government authorities and cooperate with any resulting official proceedings. The determination of whether and when to refer a matter to government authorities, or to self-report compliance violations, will be made by Shockwave's General Counsel or such person's designees.

h) **Anonymity & Confidentiality.** When you make a report directly or through Shockwave's Ethics Hotline, you may choose to remain anonymous, although you are encouraged to identify yourself to facilitate communication. If you make your identity known, Shockwave's Legal Department and any investigators will take every reasonable precaution to keep your identity confidential, consistent with conducting a thorough and fair investigation. To help maintain confidentiality, avoid discussing these issues, or any investigation, with other employees. Because we strive to maintain strict confidentiality in all investigations, we may not be able to inform you of the outcome of an investigation.



## Q&A

**Question:** I understand that the Shockwave Ethics Hotline and internet portal provide an option for reporting anonymously. But can't Shockwave just trace back to my phone number or computer?

**Answer:** No. Shockwave contracts with a third-party service provider to provide the Shockwave Ethics Hotline and online reporting. The service provider collects the information, creates a report, and sends it to Shockwave for investigation. Shockwave doesn't have access to information about the phone or computer used to report a concern. The third-party service provider is contractually not allowed to provide any identifying information if a person has elected to remain anonymous.

i) **Making False Accusations.** Shockwave will protect any employee who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with an investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.

**2) Government Request & Subpoenas.** Employees should immediately contact Shockwave's Legal Department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) if they are contacted by law enforcement or other government officials with respect to their duties in most circumstances. However, employees:

- are not required to disclose to Shockwave that any governmental or regulatory entity has contacted such person regarding possible violation of any federal, state, or local law, rule, or regulation;
- do not need the prior authorization of Shockwave to disclose to any governmental or regulatory entity information regarding possible violation of any federal, state, or local law, rule, or regulation; and
- do not need to disclose to Shockwave that such person has made such a disclosure.

Any information you provide to law enforcement or government officials must be completely honest and truthful. Pursuant to our legal hold requirements, you must save all records and documents that may be relevant to any subpoena, litigation, or investigation, including any records that may otherwise be automatically destroyed or erased (such as e-mail and voice mail messages).

**3) Waivers of this Code of Conduct.** Shockwave will waive application of the policies set forth in this Code only where legal and where circumstances warrant granting a waiver based on the best interests of Shockwave and its stockholders. Any waiver pertaining to an employee must be approved by Shockwave's General Counsel and by Shockwave's Chief Executive Officer. Waivers of the Code for directors and executive officers may be made only by those members of the Board of Directors not involved in the possible waiver and must be promptly disclosed as required by law or regulation.

**Contact Information for Reporting**

If you (i) think that an actual or possible violation of this Code, any other Shockwave policy or procedure, or applicable laws and regulations has occurred, (ii) have questions or concerns about whether any conduct may violate this Code, or (iii) wish to clarify gray areas, it is important to get in touch immediately with your supervisor, Shockwave's Human Resources department, Shockwave's Legal Department at [legal@shockwavemedical.com](mailto:legal@shockwavemedical.com), or the Shockwave Ethics Hotline at 1-844-783-5397 (or via the internet at [www.shockwavemedical.ethicspoint.com](http://www.shockwavemedical.ethicspoint.com), where you can also find additional options for international reporting via telephone or the internet).

## ***Ethical Practices***

### **4) Conflicts of Interest.**

a) **General.** Shockwave believes business decisions should be made with sound judgment and integrity and not influenced by a conflict of interest. A conflict exists when your personal, social, or financial interests, duties, obligations, or activities, or those of a family member, influence your decisions in a way that is inconsistent or incompatible with the interests of Shockwave. Conflicts of interest expose our personal judgment and Shockwave to increased scrutiny and criticism and can undermine our credibility and the trust that others place in us.

b) **Disclosure.** Employees must make prompt and full disclosure of any situation that may involve an actual or potential conflict of interest. Employees should contact Shockwave's General Counsel ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) to make such disclosures, or to report any questions, problems, or issues regarding conflicts of interest.

c) **Examples.** While it is impossible to list all activities that could pose a conflict of interest, the following are common examples:

- **Financial Interest.** Conflicts of interest may arise if you or a family member has a substantial financial interest in a Shockwave supplier, competitor, or customer.
- **Outside Business and Other Interests.** A conflict of interest exists if your outside business or other interests can affect your objectivity, motivation, or performance as a Shockwave employee. For that reason, a second job is strongly discouraged. A second job or other affiliation with a Shockwave competitor is not allowed. A second job or other affiliation with a Shockwave customer, supplier, or provider of goods or services is prohibited. Employees who engage in outside employment must submit a written notice to Shockwave explaining the details of the outside employment. When the type of outside employment is not prohibited, employees are still bound by all confidentiality agreements with Shockwave and all Shockwave policies and procedures relating to confidential or inside information. Refer to the **Shockwave Employee Handbook, Outside Employment** section for more information, specifically for the types of outside employment that are strictly prohibited.
- **Outside Director/Board Memberships, Officer, and Trustee Positions.** Serving on the board of directors or an advisory committee of for-profit and non-profit organizations may present many opportunities for conflicts of interest. Before agreeing to become a member of the board of directors or an advisory committee of any for-profit organization, you should contact Shockwave's legal department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) to determine the relationship, if any, existing between Shockwave and the for-profit organization. To make sure activities relating to non-profit or community organizations do not create a conflict of interest or other problems, you should notify your supervisor of your prospective appointments before you

agree to the board service. You may not serve on the board of directors of a company or organization that raises the potential for a significant conflict of interest (e.g., certain competitive, supplier, or customer relationships). If approved for serving on the board of directors of an outside company or organization, you may not conduct outside business during working hours or use company assets or information in any work for another business.

- **Employment of Relatives & Friends.** Shockwave discourages hiring close personal friends or relatives in the same business unit. A potential conflict arises if you hire, manage, or otherwise do business with a close personal friend, relative, or someone with whom you have an intimate relationship. The actions of family members and friends outside the workplace can also create a conflict if their actions cause you to lose your objectivity in the workplace. Refer to the **Shockwave Employee Handbook, Employment of Family Members and Relationships** section for more information.
- **Gifts, Entertainment, and Other Items of Value.** You and your immediate family may not give or accept gifts, services, perks, entertainment, discounts, loans, or other items of more than modest value by local standards, to or from those who are doing business or seeking business with Shockwave. In addition, specific limitations apply in our interactions with healthcare professionals, and you should contact Shockwave’s Legal Department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) for further guidance on this topic.
- **Corporate Opportunities.** You have a duty to Shockwave to advance Shockwave’s legitimate interests should the opportunity arise. You should not take personal advantage of opportunities or favors offered to you by virtue of your employment with Shockwave. Be respectful of Shockwave property, information, and position, and make sure that you and your family members don’t use them for personal gain. Discounts on personal purchases of a supplier or customer’s products or services should not be accepted unless such discounts are offered to all employees in general.

## Q&A

**Question:** My brother owns a business and wants to be a Shockwave supplier. Is that allowed?

**Answer:** Yes, but you must adequately disclose this relationship to Shockwave’s General Counsel and the appropriate department manager. Normal procedures for selecting a supplier must be followed to ensure there is no appearance of special treatment for your brother.

d) **“Related Person” Transactions.** In addition to the general provisions above, certain transactions involving any of Shockwave’s directors (including nominees for director), executive officers, shareholders owning 5% or more of Shockwave’s voting securities, and the immediate family members of any of the foregoing, require review by Shockwave’s Board of Directors.

*For further details regarding Related Person Transactions please see the following:*

[\*Related Person Transaction Policy\*](#)

**5) Anti-Corruption/Anti-Bribery.** Shockwave prohibits bribery of any kind, including bribes to or from governmental officials and to or from non-government parties (commercial bribery). We have a zero-tolerance policy for bribery in all of our operations and activities. This means that Shockwave, its employees, consultants, and advisors shall not engage in any form of bribery, including offering, providing, promising, or agreeing to provide, offer, authorize, solicit, or accept anything of value, directly or indirectly, with the intent to obtain or retain business or an improper advantage or to secure services.

*For further details please see Shockwave's Global Anticorruption Policy available at:*

[\*Shockwave Global Anti-Corruption Policy\*](#)

**6) Anti-Kickbacks.** Shockwave prohibits providing anything of value intended to obtain favorable treatment in connection with a prospective or actual business arrangement, otherwise known as a "kick-back". You cannot do any of the following:

- offer, provide, solicit, or accept a kickback;
- attempt to offer, provide, solicit, or accept a kickback; or
- directly or indirectly include the amount of a kickback in the amount we charge or pay under a business arrangement.

State and federal healthcare anti-kickback statutes specifically prohibit businesses in the healthcare space from offering, providing, soliciting, or accepting a kickback in return for, or to induce, the referral of any patient or healthcare business. You cannot enter into any of these types of prohibited arrangements. The laws can be broadly interpreted so that even where there are other, entirely legitimate business purposes present, if at least one purpose of the arrangement is to exchange money for the referral of services or to induce further referrals, the arrangement may be prohibited. Common targets of kickback investigations are physicians, marketers, consultants, and business owners.

**7) Fair Dealing with Customers, Suppliers and Competitors.** Shockwave is committed to dealing fairly with its associates, customers, suppliers, and competitors. You are expected to promote Shockwave products and services in a manner consistent with the customer's expressed financial needs and goals and to provide sufficient information to allow customers to make informed decisions voluntarily and without any form of coercion or undue influence. You are prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

**8) Competitive Intelligence.** Gathering information about our competitors, often called competitive intelligence is a legitimate business practice. Doing so helps us stay competitive in the marketplace; however, we must never use any illegal or unethical means to get information about other companies. Legitimate sources of competitive information include publicly available information such as news accounts, industry surveys, competitors' displays at conferences and trade shows, and information publicly available on the Internet. You may also gain competitive information appropriately from customers and suppliers (unless they are prohibited from sharing the information) and by obtaining a license to use the information or lawfully purchasing the ownership of the information. When working with consultants, vendors, and other partners, ensure that they understand and follow Shockwave policy on gathering competitive information.

**9) Antitrust & Fair Competition.**

a) **General Policy.** All our directors, officers, and employees must comply with antitrust and competition laws. International, U.S. federal, and state antitrust and competition laws prohibit efforts and actions to restrain or limit competition between companies that otherwise would be competing for business in the marketplace.

b) **Interactions with Competitors.** We treat our competitors with respect while protecting Shockwave's reputation and assets. Be particularly careful when you interact with any employees or representatives of our competitors. You should use extreme care to avoid any improper discussions with our competitors, especially at trade association meetings or other industry or trade events where competitors may interact. You should not have discussions with competitors regarding any of the following topics without express sign-off from Shockwave's Legal Department:

- prices or pricing strategy;
- discounts;
- terms of our customer relationships;
- sales policies;
- marketing plans;
- customer selection;
- allocating customers or market areas; or
- contract terms and contracting strategies.

Agreements with competitors do not need to be in writing in order to violate applicable antitrust and competition laws. Informal, verbal, or implicit understandings, i.e., knowing winks, are also violations. Antitrust violations in the U.S. may be prosecuted criminally as felonies and can result in severe penalties for Shockwave and any associate or other person who participates in a violation.

c) **Other Prohibited Practices.** Depending on business justification and effect on competition, other practices not involving competitors may result in civil violations of the antitrust and competition laws. These practices include:

- exclusive dealing;
- bundling/package offerings;
- resale restrictions; and
- selective discounting.

You should contact Shockwave’s Legal Department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) with any questions about the legality of practices or conduct under the antitrust and competition laws. If you become aware of any potential violations, contact the Shockwave’s Legal Department or report anonymously through the Shockwave Ethics Hotline at 1-844-783-5397 or via the internet at [www.shockwavemedical.ethicspoint.com](http://www.shockwavemedical.ethicspoint.com), where you can also find additional options for international reporting via telephone or the internet.

**10) Insider Trading.** We recognize that trading based on inside information is not only unfair, but also illegal. We maintain trust with our investors and the public by respecting financial laws, which means we do not trade based on material nonpublic information. In our work, we may become aware of material, nonpublic information about Shockwave or companies with which we do business. Information is “**material**” if a reasonable investor would consider it important in deciding whether to buy or sell that company’s securities. Information is “**nonpublic**” if it has not been broadly communicated to the investing public. Trading or enabling others to trade Shockwave stock or the stock of any other company - such as a customer, supplier, competitor, potential acquisition, or alliance - based on this information not only breaks trust with our investors and the public, but is also illegal, violates company policy, and is unfair to other investors. To use material nonpublic information in connection with buying or selling securities, including “**tipping**” others who might make an investment decision based on this information, is also unethical and illegal.

*For further details please see Shockwave’s Statement of Policy Concerning Trading in Company Securities, available the Legal Department intranet portal at:*

[\*\*Statement of Policy Concerning Trading in Company Securities\*\*](#)

**11) Anti-Boycott.** We do not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, contact Shockwave’s Legal Department, and do not respond to the request. Federal law prohibits transactions with certain persons or entities that have violated export-related laws or are believed to pose a threat to national security. Additionally, doing business with certain countries may result in imposed economic sanctions. We must perform due diligence before any transaction with an international element to determine whether such parties are on the U.S. government’s restricted list. Contact Shockwave’s Legal Department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) to ensure that all such transactions are properly evaluated to prevent potential violations.

## Q&amp;A

**Question:** What is a boycott request?

**Answer:** A request, as a condition of doing business, to discriminate against a person or company from a target country comprised of or affiliated with a particular nationality, race, or religion.

**12) Trade Compliance.** We are all responsible for complying with U.S. federal import and export laws and regulations and all applicable laws that govern international trade. These laws and regulations are complex and may change quickly as governments adjust to new political and security issues. If your work is governed by U.S. custom laws, it is your responsibility to understand the laws and regulations that relate to international trade. We also expect all our vendors to know and understand the laws that apply to their products, including customs and other U.S. government agencies. If you work in our supply chain, you need to make sure you (and our vendors) provide accurate product descriptions, correct tariff classifications, valuation information, and country of origin statements for all items we import or export, whenever required. If you have a question or concern, report it immediately.

**13) Anti-Money Laundering.**

a) **General.** Money laundering is a global problem with far-reaching and serious consequences. Money laundering is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Complex commercial transactions may hide financing for criminal activity such as terrorism, illegal narcotics trade, bribery, and fraud. Involvement in such activities undermines our integrity, damages our reputation, and can expose Shockwave and individuals to severe sanctions. Shockwave forbids knowingly engaging in transactions that facilitate money laundering or result in unlawful diversion. We take affirmative steps to detect and prevent unacceptable or illegal forms of payment and financial transactions. Anti-money laundering laws of the United States and other countries and international organizations require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws throughout the world and will conduct business only with reputable customers involved in legitimate business activities and transactions.

b) **Lists Potential Warning Signs of Money Laundering.** Money laundering is conduct designed to disguise proceeds of criminal activity by individuals or entities. Shockwave will not condone, facilitate, or support money laundering. Two areas that deserve special awareness are unusual ways in which payments may be requested and customers who appear to lack integrity in their operations. Be alert for:

- requests for cash payment, travelers' checks, or checks from an unknown third party;
- complex payment patterns;
- unusual transfers to or from countries not related to the transaction;
- customers who seem eager to avoid recordkeeping requirements;



- transactions involving locations previously associated with money laundering or tax evasion; and
- transactions which are inconsistent with usual business practices, or which do not match the customer's or client's normal pattern of activity.

**14) Fraud.** It is never acceptable to take any part in any activity involving theft, fraud, embezzlement, extortion, or misappropriation of property, no matter how small your role. Participation in fraud not only occurs when you engage in the activity itself but also when you help conceal, alter, falsify, or omit information in our records either for your benefit or at the direction of any others. You must refuse to engage in any questionable activities and must follow up any suspicions.

## *Our Workplace*

### 15) **Discrimination & Harassment Prevention.**

a) **Discrimination.** We're a group of unique, diverse, and talented people, and that's part of what makes us successful. Let's do our part to keep our workplace respectful and inclusive. Shockwave prohibits discrimination in employment, employment-related decisions, or in business dealings based on an individual's race, color, ancestry, age, sex, sexual orientation, gender, gender expression, religion, disability, ethnicity, national origin, veteran status, marital status, pregnancy, and any other status protected by the laws or regulations in the locations where we operate.

We recognize that a highly productive workforce – made up of diverse team members who bring a wide variety of skills, abilities, experiences, and perspectives – is critical for us to better understand the complexity of our customers' needs and deliver high-value solutions in innovative ways. Our employees should be given opportunities to flourish in a barrier-free, non-discriminatory environment. We comply with laws regarding employment of immigrants and noncitizens and provide equal employment opportunities to everyone who is legally authorized to work in the applicable country. We provide reasonable accommodations to individuals with disabilities and remove any artificial barriers to success.

It is critical that every Shockwave employee feels valued and is provided with opportunities to contribute to the business. If you believe your rights have been violated or have any other workplace concerns, you should consult your supervisor or another member of your management chain or call Shockwave's Human Resources Department directly. If you do not receive a clear explanation or believe you may not receive an objective or adequate review of the issue from your supervisor or Shockwave's Human Resources Department, call the Shockwave Ethics Hotline at 1-844-783-5397 or via the internet at [www.shockwavemedical.ethicspoint.com](http://www.shockwavemedical.ethicspoint.com), where you can also find additional options for international reporting via telephone or the internet. Refer to the **Shockwave Employee Handbook, Equal Employment Opportunity and Policy Prohibiting Harassment, Discrimination, and Retaliation** section for more information.

#### Q&A

**Question:** One of my colleagues consistently makes derogatory jokes about certain nationalities. Everyone else always laughs, but the jokes always make me feel uncomfortable. What should I do?

**Answer:** You should immediately inform your manager, reach out to Shockwave's Human Resources Department, contact Shockwave's Legal Department, or report the issue through Shockwave's Ethics Hotline. These types of jokes and comments are discriminatory and violates our policies and this Code.

b) **Harassment.** We observe a zero-tolerance policy when it comes to harassment of our people. Harassment in the workplace is prohibited regardless of whether it is welcome or unwelcome and regardless of whether the individuals involved are of the same or different sex, sexual orientation, race, or another status. Harassment includes verbal, visual, or physical conduct which inappropriately or unreasonably interferes with

work performance, diminishes the dignity of any person, or creates an intimidating, hostile, or otherwise offensive work environment based on an individual's legally protected status. Examples of harassment include:

- sexual advances, requests for sexual favors, sexually explicit language, off-color jokes, remarks about a person's body or sexual activities;
- displaying sexually suggestive pictures or objects, suggestive looks, leering or suggestive communication in any form;
- inappropriate touching, both welcome and unwelcome;
- using slurs or negative stereotyping;
- verbal kidding, teasing or joking;
- intimidating acts, such as bullying or threatening; and
- any other conduct that shows hostility toward, disrespect for, or mistreatment of an individual based on the individual's legally protected status.

If you believe you are being harassed or have witnessed harassment of a colleague, you need to report this to your manager, another manager, Shockwave's Human Resources Department, or Shockwave's Legal Department. Shockwave will act promptly in investigating your concern and directly address the issue with the individuals involved. We recognize the sensitive nature of these claims and will work to ensure confidential treatment of the allegations in order to protect all involved. Refer to the **Shockwave Employee Handbook, Equal Employment Opportunity and Policy Prohibiting Harassment, Discrimination, and Retaliation** section for more information.

#### 16) Non-Retaliation.

a) **General.** We believe it is essential to create an environment where individuals feel able to raise any matters of genuine concern internally without fear of disciplinary action being taken against them. Employees can trust that any issue raised in good faith will be taken seriously and that the matter will be investigated appropriately and be kept confidential, as far as practicable. Shockwave values the help of employees who identify potential problems that we need to address. Any employee who reports a concern or violation in good faith will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation. Retaliation against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct that the employee believes in good faith constitutes a violation of applicable laws or regulations, this Code, or Shockwave's related policies is prohibited and will, in itself, be treated as a violation of this Code. Individuals who take action against a person for making a report or participating in an investigation in good faith will be subject to disciplinary action, up to and including termination, as local law permits. Refer to the **Shockwave Employee Handbook, Equal Employment Opportunity and Policy Prohibiting Harassment, Discrimination, and Retaliation** section for more information.

b) **Definition of “Good Faith”.** Acting in “good faith” means that you provide all of the information you have and believe you are giving a sincere and complete report.

c) **Self-Reporting.** Nothing in this Code shall be construed as excusing any person from their own misconduct or protecting them from disciplinary action due to their self-reporting that misconduct. However, the fact that a person self-reported their own wrongdoing will be taken into consideration in determining an appropriate response.

d) **Victims of Retaliation.** Any person who reasonably believes that they have been subject to retaliation due to their disclosure of a legal or ethical compliance incident, or potential conflict of interest, shall immediately inform Shockwave’s General Counsel ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)).

**17) Diversity & Inclusion.** We are one team with many different ideas, backgrounds and experiences and we believe diversity and inclusivity make Shockwave better. We believe that we best serve and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the company. This is why Shockwave maintains a safe and inclusive work environment where all dimensions of difference are valued and respected. We want everyone to feel welcome and able to be their authentic self to create value and drive growth. All employment-related decisions must be based on company needs, job requirements, and individual qualifications. Each Shockwave employee should always be inclusive and celebrate what team members have to offer.

*For further details regarding diversity and inclusion at Shockwave, please see Shockwave’s Equality, Diversity, and Inclusion (EDI) Policy available at:*

[Equality, Diversity, and Inclusion Policy](#)

You may also receive additional information by contacting Shockwave’s EDI Team at [diversity@shockwavemedical.com](mailto:diversity@shockwavemedical.com).

**18) Substance Abuse/Drug and Alcohol-Free Workplace.** Shockwave strives to maintain a workplace that is free from illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances shall not be used in a manner that impairs a person’s performance of assigned tasks. Shockwave reserves the right to conduct searches of Shockwave property or employees and their personal property brought onto the premises and have an employee tested if there is reasonable suspicion that he or she is under the influence of drugs or alcohol. If you are using prescription or non-prescription drugs that may impair alertness or judgment or witness an employee impaired and therefore possibly jeopardizing the safety of others or Shockwave business interests, you should report it immediately. If you have a problem related to alcohol or drugs, you are encouraged to seek assistance from qualified professionals. Please contact Shockwave’s Human Resource department for further guidance. Refer to the **Shockwave Employee Handbook, Substance Abuse** section for more information.

**19) Workplace Safety and Health.** Shockwave values the safety and health of every employee. We strive to provide a safe and healthy workplace for employees, customers, and visitors to our premises. All managers have the responsibility for ensuring proper safety and health conditions for their employees. Management is

committed to maintaining industry standards in all areas of employee safety and health, including industrial hygiene, ergonomics, and security. To support this commitment, employees are responsible for observing all safety and health rules, practices and laws that apply to their jobs, and for taking precautions necessary to protect themselves, their co-workers, and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses, and unsafe practices or conditions to their supervisor. As is the case with any violation of this Code, employees are responsible for reporting any unsafe behavior or condition regardless of whether they are directly involved or a witness. Refer to the **Shockwave Employee Handbook, Safety** section for more information.

**20) Workplace Violence.** To preserve employee safety and security, weapons, firearms, ammunition, explosives, and incendiary devices are forbidden on Shockwave’s premises or in Shockwave vehicles. In addition, Shockwave will not tolerate acts or threats of violence, including extreme or inappropriate verbal or physical threats, intimidation, harassment and/or coercion. Behavior that threatens the safety of people or property, or has the potential to become violent, should be immediately reported to your supervisor, Shockwave’s Human Resources Department, Shockwave’s Legal Department, or the Shockwave Ethics Hotline.

**21) Human Rights & Fair Labor.** We are committed to upholding fundamental human rights and believe that all human beings around the world should be treated with dignity, fairness, and respect. We ask that our suppliers and direct contractors demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. Shockwave does not use or condone slave labor or human trafficking, denounces any degrading treatment of individuals or unsafe working conditions, and supports our products being free of conflict minerals. We are committed to following all applicable wage and hour laws and regulations.

*For further details, please refer to Shockwave’s Modern Slavery Act Transparency Statement available at:*

[Modern Slavery Act Transparency Statement](#)

## ***Proper Recordkeeping***

### **22) Maintaining Accurate Financial Records/Internal Accounting Controls.**

a) **General.** Accurate and reliable records are crucial to our business. Integrity in our recordkeeping inspires the trust of our customers, partners, and investors. We are committed to maintaining accurate company records and accounts in order to ensure legal and ethical business practices and to prevent fraudulent activities. We are responsible for helping to ensure that the information we record, process, and analyze is accurate and recorded in accordance with applicable legal or accounting principles. We also need to ensure that it is made secure and readily available to those with a need to know the information on a timely basis. Shockwave records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files, and all other records maintained in the ordinary course of our business. All Shockwave records must be complete, accurate, and reliable in all material respects.

b) **List of Unacceptable Activities.** Investors count on us to use and provide accurate information so they can make good decisions. The following are examples of activities not allowed:

- Maintaining undisclosed or unrecorded funds or assets for any purpose.
- Making, or asking others to make, false, misleading, or artificial entries on an expense report, timesheet, or any other report.
- Giving false quality or safety results.
- Recording false sales or recording sales outside of the time-period they actually occurred.
- Understating or overstating known liabilities and assets.
- Delaying the entry of items that should be current expenses.
- Hiding the true nature of any transaction.
- Providing inaccurate or misleading information for company benefit programs.

c) **Employee Responsibilities.** We must ensure that Shockwave's accounting and financial records meet the highest standards of accuracy and completeness. As an employee of Shockwave, it is your responsibility to:

- report accurate, complete, and understandable information about our business, earnings, and financial condition;

- make open and full disclosure to, and cooperate fully with, outside accountants in connection with any audit or review of Shockwave’s financial statements; and
- report immediately to your manager, the Chief Financial Officer, Ernst & Young - Shockwave’s external auditors, or Shockwave’s General Counsel if:
  - you have reason to believe that any of Shockwave’s books and records are being maintained in a materially inaccurate or incomplete manner;
  - you are being pressured to prepare, alter, conceal, or destroy documents in violation of Shockwave’s policies; or
  - you have any reason to believe that someone has made a misleading, incomplete, or false statement to an accountant, auditor, attorney, or government official in connection with any investigation, audit, examination, or filing with any government agency or regulatory body.

### 23) Records Management.

a) **General.** Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Records consist of all forms of information created or received by Shockwave, whether originals or copies, regardless of media. Examples of company records include paper documents, e-mail, electronic files stored on hard drive, disk or any other medium (CD, DVD, USB data storage devices, etc.), or in the cloud, that contains information about our company or our business activities.

All records are the property of Shockwave and should be retained in accordance with our Records Retention Policy. We are responsible for properly labeling and carefully handling confidential, sensitive, and proprietary information and securing it when not in use. We do not destroy official company documents or records before the retention time expires but do destroy documents when they no longer have useful business purposes.

b) **Employee Responsibilities.** Retain or discard Shockwave’s records in accordance with Shockwave’s Record Retention Policy. Shockwave’s Legal Department may issue notices regarding retention of records in the case of actual or threatened litigation or government investigation. Employees must abide by the directions contained in these notices, as failure to do so could subject Shockwave and employees to serious legal risks. If employees have questions about the recordkeeping requirements that apply to their jobs, please contact Shockwave’s Legal Department at [legal@shockwavemedical.com](mailto:legal@shockwavemedical.com).

### 24) Data Privacy.

a) **Third-Party Data.** Shockwave respects the privacy of its business partners, customers, and others for whom we may handle personal data. We must handle personal data responsibly and comply with all applicable privacy laws and company policies (including our records retention requirements). Personal data is information that can directly or indirectly identify an individual, such as name, contact information, and health-related information. Employees who handle the personal data of others must:

- act in accordance with applicable law;
- act in accordance with any relevant contractual obligations;
- collect, use and process such information only for legitimate business purposes;
- limit access to the information to those who have a legitimate business purpose for seeing the information; and
- take care to prevent unauthorized disclosure.

b) **Employee Information.** Shockwave respects the confidentiality of the personal information of employees, including employee medical and personnel records. Access to personal information is only authorized when there is a legitimate and lawful reason, and access is only granted to appropriate personnel. Requests for confidential employee information from anyone outside our company under any circumstances must be approved in accordance with our policies. However, it is important to remember that employees should have no expectation of privacy with regard to normal course workplace communication or any personal property brought onto Shockwave premises or used for Shockwave business.

c) **Privacy Laws.** Protecting the privacy and security of personal information is a growing global concern. Many countries are enacting or strengthening privacy laws that govern the use of personal information and holding violators accountable.



## ***Protection of Shockwave Assets***

### **25) Protection of Confidential Information.**

a) **General.** One of our most important assets is our confidential information. As an employee of Shockwave, you may learn of information about Shockwave that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes non-public information that might be of use to competitors or harmful to Shockwave or its customers if disclosed, such as business, marketing and service plans, financial information, product architecture, source codes, engineering and manufacturing ideas, designs, databases, customer lists, pricing strategies, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers, and social security numbers), and similar types of information provided to us by our customers, suppliers, and partners. You are expected to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels (usually through a press release, an SEC filing, or formal communication from a member of senior management). Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment at Shockwave until that information is disclosed to the public through approved channels. You should also take care not to disclose confidential information inadvertently. Materials that contain confidential information, such as notebooks, cell phones, and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information, or prospects on the Internet is prohibited. You may not discuss our business, information, or prospects in any “chat room”, regardless of whether you use your own name or a pseudonym. All company emails, voicemails, and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of Shockwave, except where required for legitimate business purposes. Refer to the **Shockwave Employee Handbook, Confidentiality and Trade Secrets** section for more information.

b) **Handling of Material Non-Public Information.** Material non-public information is a specific category of confidential information relating to information that is “material”, meaning there is a substantial likelihood that a reasonable investor would consider it important in making an investment decision, and “non-public”, meaning it has not been disseminated in a manner making it available to investors generally on a broad-based, non-exclusionary basis. There are a variety of requirements relating to material non-public information, and if you have any questions regarding material non-public information, please contact Shockwave’s Legal Department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)).

*For related information please refer to Shockwave's Policy Regarding the Treatment of Material Non-Public Information available the Legal Department intranet portal at:*

[Policy Regarding the Treatment of Material Non-Public Information](#)

**26) Protection of Intellectual Property.** Our intellectual property is among our most valuable assets. Intellectual property refers to creations of the human mind that are protected by various national laws and international treaties. Intellectual property includes copyrights (protects materials such as computer software, music, artwork, audio, and videotapes, books, presentations, and training materials), patents (protects inventions), trademarks (protects product and service names and logos), and trade secrets (protects proprietary information), as well as other rights, including design rights, expertise, proprietary rights, and other intangible industrial or commercial property.

We must protect and, when appropriate, enforce our intellectual property rights. We also respect the intellectual property belonging to third parties and must not knowingly infringe upon the intellectual property rights of others. Partners must promptly disclose to Shockwave, in writing, any such work product and cooperate with our efforts to obtain protection for Shockwave. To ensure that Shockwave receives the benefit of work done by outside consultants, it is essential that an appropriate agreement or release be in place before any work begins.

**27) Protection of Shockwave Assets & Resources.** Our assets are the resources we use to conduct our business. Our assets include:

- physical assets, such as office furnishings, equipment, and supplies;
- technology assets, such as computer hardware, software, and information systems;
- financial assets, such as cash, securities, and credit cards;
- Shockwave's name, brand, and customer relationships; and
- information assets, such as intellectual property, including information about products, services, systems, and other data.

Use Shockwave assets for legitimate Shockwave business and appropriately safeguard them, including against cyber-related attack, theft, loss, waste, and abuse. Never sell, lend, or give them away, regardless of their condition or value, unless you are authorized to do so. You also have a responsibility to extend the same degree of care to assets entrusted to Shockwave by others. All physical and technology assets provided by Shockwave, whether used inside or outside the workplace, are property of Shockwave and are provided for your business use. In general, you should not use Shockwave assets (including technology or information resources) for your personal activities.

## ***Proper Communications***

**28) Communicating with External Parties.** Shockwave is committed to providing clear, accurate, complete, and consistent information to the public. To ensure professional handling, all media requests and requests from financial analysts, stockholders, and industry analysts should be forwarded to Investor Relations at [investors@shockwavemedical.com](mailto:investors@shockwavemedical.com).

**29) Social Media.** Social media is a great way to connect with family, friends, and colleagues, and we encourage Shockwave employees who participate in social media to do so in a respectful and relevant way, and to protect the reputation of themselves and Shockwave. Employees who choose to make use of social media or otherwise engage in online communications as identifiable employees of Shockwave must always comply with this Code and Shockwave’s Employee Handbook on all forms of social media. Only designated Shockwave employees are authorized to speak on behalf of Shockwave on social media. Colleagues who choose to speak on social media about Shockwave in any way must make it clear that they are Shockwave employees, but not speaking on behalf of Shockwave or as an official Shockwave representative. All Shockwave-branded social media accounts (using “Shockwave” or any Shockwave business unit, department, or product name as part of the account name or URL and/or using the Shockwave logo or portion of the logo in any way) must be approved in advance. It is against company policy for any employee to create a Shockwave social media account without approval from the Marketing team. Refer to the **Shockwave Employee Handbook, Use of Social Media** section for more information.

### **Q&A**

**Question:** What are some real-life examples of social media use that violates our policies?

**Answer:** Posting photos of Shockwave facilities that may inadvertently reveal proprietary information or violate the privacy of other Shockwave employees, sharing information about a Shockwave product before its officially released, or unauthorized speaking on behalf of Shockwave on social media platforms are all situations that violate our social media policy.

**30) Healthcare Professional Interactions.** Shockwave is firmly committed to complying with all laws and regulations governing its interactions with Healthcare Professionals, meaning any individual or entity involved in providing health care services and/or items to patients, which purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe Shockwave’s products (“HCPs”). Agents and employees of Shockwave may not engage in any conduct that unlawfully induces anyone to refer patients or to purchase, lease, recommend, use, or arrange for the purchase, lease or use of, any Shockwave’s products. This includes, but is not limited to, physicians, nurses, nurse practitioners, physician assistants, operating room staff, physical therapists, all hospital employees regardless of title or level, and all employees of HCPs.

**31) Product Quality.** Shockwave is committed to meeting or exceeding customer and regulatory requirements regarding the research, development, manufacturing, packing, testing, supplying, and marketing of our products. Quality means consistently delivering innovative, safe, and effective products that fulfill the

needs of Shockwave’s customers while complying with regulatory requirements and maintaining the effectiveness of the Quality Management System. Shockwave customers include internal company employees, consumers, HCPs, healthcare organizations, government agencies, and distributors. While patients are not Shockwave customers, they are ultimately impacted by what we do and how we do it. Quality improvement in all areas of our business is imperative to deliver consistent quality products and procedures that can treat even the most complex conditions. The achievement of our quality goals and objectives depends on our ability to listen to and deliver on customer needs in every business activity.

**32) Marketing and Advertising.** Our customers and the patients they serve depend not only on the quality of our products, but also on the quality of the information we provide to the medical community and general public. We are committed to ensuring that all our product promotions and promotional materials are accurate, balanced, and not misleading and conform to all applicable laws and regulations. Our promotional materials and promotions must be approved in advance in line with our standard operating procedures. All promotions must be consistent with approved instruction for use for our products and we do not tolerate, or market our products for, any “off-label” promotion or in any fashion other than the instruction for use. We do not tolerate or permit any employee to provide advice or guidance to any other person or entity, including any customer or HCPs, with respect to matters related to healthcare coding or reimbursement.

#### Q&A

**Question:** What if a physician asks me questions about using our products in a way that is inconsistent with the product labeling, can I point him to other physicians who are also prescribing such use?

**Answer:** Shockwave employees must not provide physicians with information that is inconsistent with the U.S. Food and Drug Administration cleared or approved label. You should let the physician know that Shockwave does not promote use of any of our products for purposes other than those specified in the product label.

**33) Proper Use and Protection of Electronic Communications.** Shockwave’s information technology and communications systems are vital to enable us to conduct our business and reach out to our consumers. If you have access to our information systems and computer networks, you are responsible for using the highest standards of behavior in all your usage and communications. When you access our networks from remote locations (for example, at home or from other non-company locations), you are subject to the same standards of use as if accessed on company premises. The data transmitted, received, and stored by or within those systems, such as telephones, personal computers, data storage units, email, or pagers, are valuable assets. We must protect such assets to ensure that these resources are accessible for business purposes, that Shockwave’s reputation is protected, and that we minimize the potential for legal risk. Limited personal use may be acceptable so long as it does not interfere with Shockwave’s business activities or involve a meaningful amount of time or Shockwave’s resources.

*For related information please refer to Shockwave’s Information Security Policy available the Information Technology Department intranet portal at:*

**[Information Security Policy](#)**

## ***The Environment and Society***

**34) Social Responsibility.** We pride ourselves on being a company that operates with integrity, makes good choices, and does the right thing in every aspect of our business. We will continually challenge ourselves to define what being a responsible company means to us and translate our definition into behavior and improvements at Shockwave. We seek to align our social and environmental efforts with our business goals and continue to develop both qualitative and quantitative metrics to assess our progress.

**35) Environmental Stewardship.** In the challenges that face our planet, we are committed to being part of the solution. We pledge to conduct business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for ensuring that Shockwave business is conducted in compliance with all applicable laws and in a way that is protective of the environment.

*For more information regarding Shockwave's commitment to the environment, please refer to Shockwave's Environmental Policy available at:*

**[Environmental Policy](#)**

## ***Third Parties and Procurement***

### **36) Selection and Use of Third Parties.**

a) **General.** We believe in doing business with third parties that embrace and demonstrate high principles of ethical business behavior. We rely on suppliers, contractors, and consultants to help us accomplish our goals. They are part of the Shockwave team and should be treated according to our values. To create an environment where our suppliers, contractors, and consultants have an incentive to work with Shockwave, they must be confident that they will be treated in an ethical manner. We offer fair opportunities for prospective third parties to compete for our business. How we select our suppliers and the character of the suppliers we choose directly reflects the way we conduct business.

b) **Procurement Practices.** Our procurement decisions are made on a competitive basis based on total value, which includes quality, suitability, performance, service, technology, and price. Proper procurement conduct includes:

- using established corporate-wide agreements;
- obtaining competitive bids as necessary;
- confirming the financial and legal status of the supplier;
- verifying quality and service claims on a regular basis;
- making sure that purchase agreements clearly state the services or products to be provided, the basis for earning payment, and the applicable rate or fee;
- verifying that invoices clearly and fairly represent goods and services provided and
- avoiding reciprocal agreements or exchange of favors.

The fee or price paid for goods and services by Shockwave must represent the value of the goods or services provided. Payments can only be made to the person or the firm that actually provides the goods or services and must be made in the supplier's home country, where it does business, or where it sold the goods or services provided, unless approval is obtained from Shockwave's Legal Department.

c) **Prohibited Conduct.** Shockwave will not knowingly use suppliers who participate in the following activities:

- using child labor, forced labor or human trafficking;
- preventing freedom of association and collective bargaining of its employees;
- engaging in disparate treatment of employees, including discrimination or harassment;

- fostering unsafe or unhealthy working environment for its workers;
- supplying unsafe or low-quality products or services;
- violating laws or regulations; or
- conducting business unethically.

**37) Government Customers/Contracting.** When doing business with federal, state, or local governments, we must ensure all statements and representation to government procurement officials are accurate and truthful, including costs and other financial data. If any project directly involves the government or if you are responsible for someone working with the government on behalf of Shockwave, be alert to the special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees. Payments, gifts, or other favors given to a government official or employee are strictly prohibited as they may appear to be a means of influence or a bribe. Failure to avoid these activities may expose the government agency, the government employee, Shockwave, and you to substantial fines and penalties. For these reasons, any sale of our products or services to any federal, state, or local government entity must be in accordance with any applicable policies and procedures.

## ***Gifts and Entertainment; Political Activity; Charitable Donations***

**38) Gifts & Entertainment.** Gifts and entertainment can create goodwill in our business relationships but can also make it hard to be objective about the person providing them. Our choice of suppliers, vendors, and partners must be based on objective factors like cost, quality, value, service, and ability to deliver. We must avoid even the appearance of making business decisions based on gifts received through these relationships. Giving or accepting gifts of nominal value are acceptable as long as your business unit does not have a more specific gift policy. Infrequent business entertainment is appropriate provided it isn't excessive and does not create the appearance of impropriety. When giving gifts or offering to entertain a business partner, ensure that your offer does not violate the recipient's own policies. If you work with public officials, be aware that even simple offers such as purchasing a meal or refreshments may be unacceptable or even against the law. Contact Shockwave's Legal Department ([legal@shockwavemedical.com](mailto:legal@shockwavemedical.com)) before providing any gift or entertainment to a public official or if you otherwise have questions regarding gifts and entertainment.

### **Q&A**

**Question:** What is the difference between a "gift" and a "bribe?"

**Answer:** A "gift" is made with "no strings attached" in the interest of, for example, building a business relationship or expressing thanks. A "bribe" occurs if you accept or give something of value to someone in return for something else.

### **39) Political Activity/Lobbying.**

a) **Personal Political Activity with Ethical Guidelines.** Shockwave encourages personal participation in the political process in a manner consistent with all relevant laws and Shockwave guidelines. You may support the political process through individual contributions or by volunteering your personal time to the candidates or organizations of your choice. The following rules, however, apply:

- You may not make or commit to political contributions on behalf of Shockwave.
- These activities must not be conducted on Shockwave time or involve using any Shockwave resources such as telephones, computers, or supplies.
- If you express a personal view in a public forum (such as a letter to the newspaper), do not use Shockwave letterhead, company e-mail, or reference your business address or title.
- Shockwave will not reimburse employees for personal political activity.
- Your job will not be affected by your personal political views or your choice in political contributions.



- If you plan to seek or accept a public office, you must obtain prior approval from Shockwave's General Counsel.

b) **Company Political Contributions.** Shockwave's political contributions must be made in accordance with local law, approved in accordance with Shockwave's Delegation of Authority and any applicable policies, and properly recorded.

#### **40) Charitable Contributions.**

a) **General.** We encourage Shockwave employees to give back to their community in ways that are meaningful. We proudly support community development throughout the world. Shockwave employees may contribute to these efforts or may choose to contribute to organizations of their own choice. However, as with political activities, you may not use company resources to personally support charitable or other non-profit institutions not specifically sanctioned or supported by Shockwave. Be sure to separate your personal community activities from your work. Pursue community activities on your own time, with your own resources and as an individual private citizen, not as a representative of Shockwave. Do not claim to represent, or imply representation of, Shockwave to the public or in any public process or forum, unless specifically requested to do so by management. You should consult Shockwave's Legal Department or the Ethics Hotline if you have questions about charitable contributions.