

SHOCKWAVE MEDICAL, INC.
CALIFORNIA DECLARATION OF COMPLIANCE
JUNE 5, 2024

Shockwave Medical, Inc. (Shockwave), has developed a Comprehensive Compliance Program in accordance with the Compliance Program Guidance for Pharmaceutical Manufacturers (OIG Guidance) published by the Office of Inspector General (OIG), U.S. Department of Health and Human Services. Our program is designed in accordance with the Medical Device Manufacturers Association (MDMA) Code of Conduct on Interactions with Healthcare Providers, as well as, the Advanced Medical Technology Association (AdvaMed) Code of Ethics on Interactions with Health Care Professionals, which are substantially equivalent to the Pharmaceutical Research and Manufacturers of America (PhRMA) Code on Interactions with Healthcare Professionals.

Shockwave is committed to conducting our business affairs with honesty and integrity. Our Compliance Program embodies our commitment to adhere to the highest ethical standards and to comply with all applicable laws, regulations and industry standards. The Compliance Program is intended to prevent, detect, and remediate violations of laws, regulations, and company policies, as well as to promote an ethical culture that guides our interactions with healthcare professionals, healthcare entities, and patients. As part of our ongoing commitment to compliance, Shockwave regularly reviews and evaluates the elements of its Program.

The fundamental elements of our Comprehensive Compliance Program is described below:

1. **Written Standards:** The Shockwave Business Code of Conduct establishes the standards and expectations of behavior in the workplace. In addition, we have established policies and procedures our employees are expected to follow, including policies and procedures specifically for those who regularly interact with healthcare professionals. In particular, Shockwave established an annual aggregate spending limit for certain promotional materials, items and promotional activities provided to California-licensed health care professionals.
2. **Chief Compliance Officer:** Shockwave has established the position of Chief Compliance Officer and appointed the General Counsel to that position. The Chief Compliance Officer is responsible for developing, operating, and monitoring a global Program. The Chief Compliance Officer reports directly to the Chief Executive Officer and regularly meets with the Board of Directors to report on any compliance issues.
3. **Compliance Committee:** Shockwave has established a Compliance Committee to assist in the implementation of the Program.
4. **Education & Training:** Shockwave has implemented regular compliance training for employees. In addition, those employees who regularly interact with healthcare professionals are required to complete additional training.
5. **Developing Effective Lines of Communication:** Shockwave encourages open communication with our employees and has established a Compliance Hotline (844-783-5397) to report concerns or potential

misconduct. The employee has the option to report anonymously. Shockwave has also adopted and communicated a non-retaliation policy.

6. **Internal Monitoring & Auditing:** Shockwave performs ongoing activities to monitor, audit and assess compliance with the program and related policies and procedures.

7. **Investigations & Discipline:** Shockwave thoroughly investigates allegations of non-compliance or misconduct and encourages employees to report concerns without the fear of retaliation. We have established disciplinary and corrective procedures to address violations that are detected.

Shockwave established an annual aggregate spending limit for certain promotional materials, items and promotional activities provided to California-licensed healthcare professionals.

Declaration of Compliance

Shockwave Medical, Inc., declares that, to the best of our knowledge, and based on a good faith understanding of the applicable statutory requirements, that it is in compliance with the requirements set forth in California Health & Safety Code Sections 119400 -119402 in all material respects.

For a written copy of the Compliance Program or this declaration, please call 1-877-775-4846 or email compliance@shockwavemedical.com.

Last updated June 5, 2024