

**Shockwave Medical, Inc.**  
**Supplier Code of Conduct**  
**Approved on April 6, 2023**

Shockwave Medical, Inc. (“**Shockwave**”) operates with high ethical business standards and integrity in the communities where we work and live. To preserve the trust placed in us, we count on our network of suppliers, distributors, and business partners across the globe to commit to and uphold high standards of integrity, values, and operating principles.

This Supplier Code of Conduct, as may be amended from time to time (this “**Supplier Code**”), outlines Shockwave’s expectations and guidelines with respect to the conduct of any third party that provides goods or services to Shockwave for compensation including, but not limited to, our direct and indirect suppliers, co-manufacturers and co-packers, labor providers, logistic providers, and licensees including their parents, subsidiaries, affiliates, and sub-contractors (each, a “**Supplier**”).

**RESPONSIBLE SOURCING**

Our Suppliers are expected to have in place ethical and responsible sourcing practices in place with their suppliers comparable to this Supplier Code.

**COMPLIANCE WITH APPLICABLE LAWS**

We require that our Suppliers abide by all applicable national, state, and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles.

**CHILD LABOR**

Shockwave does not tolerate any form of child labor in our supply chain. Shockwave expects our Suppliers to prevent child labor in their operations. Without limitation of the foregoing, we expect that our Suppliers will only use workers who meet the minimal legal age of employment as defined by the local laws where they are located. In addition, we encourage our Suppliers to:

- Not hire any individuals under the greater of: (i) 15 years of age, or 14 years of age where local law allows; or (ii) the legal minimum age for employment in the country.
- Not employ any individuals under the age of 18, if such employment interferes with schooling or vocational education, or exposes such individuals to risks that can harm physical, mental, or emotional development.

**FORCED LABOR AND HUMAN TRAFFICKING**

Shockwave does not tolerate any form of abusive or illegal labor in our supply chain, such as forced labor or human trafficking. Shockwave requires that all labor in its supply chain be voluntary and that workers are allowed freedom of movement. All forms of forced labor and human trafficking are prohibited including but not limited to any form of prison, slave, bonded, or forced indentured labor.

**FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING**

Shockwave respects the rights of employees to freedom of association and collective bargaining across its operations and supply chain. In furtherance thereof, we expect that our Suppliers will:

- Not limit the right of workers to form, join or not join trade unions or other organizations of their choosing and collectively bargain, without, in any case, fear of discrimination, retaliation, harassment or intimidation.
- Not obstruct alternative means of freedom of association in cases where freedom of association is restricted by local law.

## **NON-DISCRIMINATION**

Shockwave does not tolerate any form of discrimination in the workplace. We are committed to diversity and inclusion in the work environment. Without limitation of the foregoing, we expect our Suppliers to:

- Prohibit discrimination in the workplace that is based on the grounds of an individual's: race; color; gender; gender expression; age; national origin; religion; citizenship status; marital status; sexual orientation; engaging in, or refraining from engaging in, protected union activity; gender identity; transgender status; physical or mental disability; protected veteran status; genetic information; pregnancy (including childbirth and related medical conditions, including medical conditions related to lactation); or other categories protected by applicable laws.
- Make hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, based solely on the worker's skill, ability, experience, and performance.

## **FAIR TREATMENT**

Shockwave does not tolerate any form of disparate treatment in the workplace and expects that its Suppliers will:

- Treat all workers with dignity and respect and not subject workers to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment.
- Clearly define and communicate to workers all disciplinary policies and procedures in support of these requirements.

## **WORKING HOURS, WAGES AND BENEFITS**

Suppliers must comply with all applicable legal standards with regards to minimum wages, overtime, and maximum hour rules that are established by laws and regulations in the applicable location. In addition, we encourage our Suppliers to work toward paying a wage that is sufficient for workers to meet their basic needs and provide at least some discretionary income.

## **WORKER HEALTH & SAFETY**

Shockwave requires that all workers be provided with a safe and healthy working environment. Without limitation of the foregoing, Suppliers shall:

- Ensure that workers have the right to refuse and report unsafe or unhealthy working conditions regardless of role, title, or responsibility.
- Train workers on the appropriate occupational health and safety policies and procedures, including emergency evacuation procedures.
- Provide workers with appropriate protective equipment and instruction on appropriate use.
- Provide potable drinking water to all workers as well as adequate and clean sanitation facilities.
- Not place unreasonable limitations to workers' access to toilets, rest, or lactation breaks.
- If applicable, provide clean and well-maintained dormitories and reasonable entry and exit privileges for workers and in compliance with safety regulations.

## **SAFETY & QUALITY**

Shockwave is dedicated to providing safe, high-quality products and we expect our Suppliers to help us meet this commitment, including through the following:

- Products and services delivered must meet all of our specifications and any requirements of applicable law.
- Any concerns about product safety or quality must be reported to Shockwave.

## **ENVIRONMENT**

We are working to advance our efforts to responsibly and sustainably source our product components, packaging materials, and other goods and services in a way that will help reduce our impact on air, land, and water. In furtherance of the foregoing, we require that our Supplier's operations fully comply with all applicable environmental laws and regulations including those related to waste disposal, hazardous waste, greenhouse gas emissions, wastewater, and toxic substances. In addition, Suppliers are encouraged to:

- Actively measure, manage, and disclose environmental impacts in areas such as Greenhouse Gas (GHG) emissions, water, and waste as well as to set targets and implement action plans for reducing environmental impacts.
- Characterize, monitor, control and treat air emissions, wastewater and solid waste generated from operations, as required prior to discharge or disposal.

## **BUSINESS ETHICS**

Shockwave is committed to conducting business ethically and lawfully in countries where we operate across our supply chain. We endeavor to only do business with Suppliers and business partners who demonstrate a strong commitment to ethical behavior. Without limitation of the foregoing, we expect that:

- Suppliers shall conduct their business in accordance with the highest ethical standards and have controls in place that prohibit and detect the misuse of company assets, corruption,

bribery, improper gifts, extortion, embezzlement and even the appearance of conflicts of interest.

- Suppliers' business dealings should be fair, legal, and honest.
- Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.
- If Suppliers and business partners extend any business courtesies to our employees, they will do so infrequently, and the courtesies must be of no more than moderate value. Suppliers and business partners will also accurately reflect their business dealings in their books and records.
- To the extent that Suppliers and business partners transports goods for Shockwave into the United States, Suppliers shall endeavor to comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at [www.cbp.gov](http://www.cbp.gov) (or other website established for such purpose by the U.S. government).

## **PRIVACY AND CONFIDENTIALITY**

In dealing with confidential information, including personal information, obtained in connection with any relationship with Shockwave (collectively, "**Confidential Information**"), Suppliers shall:

- Safeguard and make only proper use of Confidential information in accordance with all applicable laws.
- Use or disclose Confidential information only with Shockwave's express consent. Any information or data regarding Shockwave that a reasonable person would consider to be confidential shall always be treated by Suppliers as Confidential Information.
- Have implemented: (i) measures to monitor and protect the systems in which Confidential Information resides, including prevention of both internal and external data/privacy breaches; and (ii) procedures for responding to such breaches.
- Contractually obligate any third parties with access to the Confidential Information to comply with the requirements for protection of such information as set forth in this section.

## **GRIEVANCE MECHANISMS**

Shockwave expects its Suppliers to provide grievance mechanisms that are transparent, responsive, anonymous, unbiased, and confidential to workers and other parties across the value chain. In furtherance thereof, we expect that Suppliers will ensure that:

- Workers know of and have access to grievance mechanisms which allow for anonymous reporting and shall address reported concerns and violations in a timely manner and follow a clearly outlined process.
- Workers who speak up in good faith are protected from retribution, retaliation, and reprisal.

Violations and concerns may also be reported directly by employees, business partners and other parties to the Shockwave Ethics Line, a third-party monitored, independent service available 24/7 in multiple languages via phone at 844-783-5397 and internet <https://secure.ethicspoint.com/domain/media/en/gui/66688/index.html>.

## **COMPLIANCE WITH THIS SUPPLIER CODE**

We reserve the right to:

- Request from our Suppliers information about the management of relevant issues outlined in the Supplier Code.
- Verify compliance with this Supplier Code through internal and external assessment mechanisms, such as self-assessment questionnaires and on-site audits.
- Request that Suppliers disclose information that may pertain to geographical location of facilities that produce any item supplied to Shockwave, origin of raw materials produced within their facilities, and environmental performance indicators such as greenhouse gas emissions.

If Shockwave becomes aware of any non-compliance with this Supplier Code that is not remedied in a timely manner or at all, Shockwave may, in addition to any other rights or remedies available to Shockwave, take such actions as permitted under any business agreements between Supplier and Shockwave, up to termination of Shockwave's business relationship with Supplier.

Management of our Supplier Code of Conduct is the responsibility of the Shockwave legal and compliance team, which is led by our General Counsel who reports into Chief Executive Officer. Ultimate oversight of this Supplier Code resides with our Board of Directors.