

Shockwave Medical, Inc.
Global Anti-Corruption Policy
(Approved October 1, 2020)

If you suspect violations of, or have any questions regarding, this Global Anti-Corruption Policy, please contact the Legal and Compliance Team at Shockwave Medical, Inc. (legal@shockwavemedical.com). We will treat the disclosure of any information, to the extent practical and appropriate, confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law. If you wish to report or ask questions anonymously, you may do so by contacting the Shockwave Ethics Line managed by NAVEX Global at: <https://secure.ethicspoint.com/domain/media/en/gui/66688/index.html>, US and Canada toll free: (844) 783-5397. NAVEX Global will provide you with a mechanism to receive our answer or the results of our investigation while preserving your anonymity.

1. *Purpose and Scope of this Policy.* This Global Anti-Corruption Policy (this “**Policy**”) reiterates our commitment to conducting business with honesty and integrity and in accordance with all anti-corruption laws, including, but not limited to, the US Foreign Corrupt Practices Act of 1977 (“**FCPA**”), the UK Bribery Act of 2010 (“**UKBA**”), and other anti-corruption laws in countries in which Shockwave does or intends to do business. This Policy explains Shockwave’s rules with respect to ethical and honest business dealings and it provides guidance on how to act in a variety of situations. However, this Policy will not be able to provide answers to all ethical dilemmas that you may encounter – your own values and common sense will help you find your way and Shockwave’s Legal and Compliance Team is here to support you in any way necessary.

This Policy applies to Shockwave Medical, Inc. and each of its subsidiaries (“**Shockwave**”), their respective officers, directors, employees, and contractors (the “**Shockwave Parties**” and each, a “**Shockwave Party**”), and to any third-party that does business with, provides services to, and/or acts on behalf of Shockwave (each, a “**Third-Party**”), including but not limited to distributors, vendors, suppliers, subcontractors, joint-venture partners, agents, consultants and other representatives.

2. *Application of the Policy.*

2.1. *Terms of the Policy.* 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, Shockwave Parties, and Third-Parties shall not engage in any form of bribery, including offering, providing, promising or agreeing to provide, offering, authorizing, soliciting, or accepting anything of value, directly or indirectly, with the intent to obtain or retain business or an improper advantage or to secure services.

“**Anything of value**” can include, but is not limited to, money; gifts, such as gift cards; contracts or business opportunities; political or charitable donations; medical or educational expenses; job opportunities; and travel, meals, or entertainment expenses.

There is no exception for small amounts. Even the provision or acceptance of items of small value can violate this Policy and anti-corruption laws. Similarly, it does not matter whether the bribe is actually provided or accepted; the mere offer, promise, agreement, or authorization of a bribe is enough to violate this Policy and anti-corruption laws.

Without limitation of the foregoing, this Policy prohibits:

- Giving bribes: Making improper payments, or offering or providing something of value, either directly or indirectly, in order to improperly influence someone's behavior, to secure a business advantage, to secure government authorizations, licenses, approvals, etc., or to receive favorable treatment;
- Accepting bribes: Receiving something of value (either directly or indirectly) in return for giving an improper advantage or favorable treatment;
- Offering, providing, promising to provide, or authorizing unjustified benefits or payments: Offering any form of undue reward, not limited to money, including extravagant trips, entertainment or gifts of significant value, job offers, etc.; and
- Using intermediaries: Using another party to provide, promise or agree to provide, offer, solicit, or accept bribes on Shockwave's or a Third-Party's behalf.

2.2. *Government Officials.* Government Officials are any officer or employee of any government (whether U.S. or foreign); any officer or employee of any agency, department, instrumentality, company, board, commission, or enterprise that is owned or controlled by a government; any officer or employee of any international organization (e.g., Red Cross); any owner, director, officer or employee of any organization that performs a government function; or any elected official, candidate for public office, or political party. Government Officials includes employees of state-owned or controlled companies and entities. In countries with nationalized healthcare, like China, many hospitals are state-owned or controlled and, as a result, many healthcare professionals are considered Government Officials.

If Shockwave, any Shockwave Party, or any Third-Party interacts with Government Officials in the course of providing services to and/or acting on behalf of Shockwave, we must be especially cautious.

Consistent with this Policy, Shockwave, Shockwave Parties and Third Parties may not offer, provide, promise or agree to provide anything of value to influence the actions or decisions of, or to obtain any improper advantage with, government employees or the government bodies they may influence.

2.3. *Expediting Payments.* Shockwave does not permit expediting payments. Expediting payments (also known as "facilitating" or "grease" payments) are payments made to speed up or secure the performance of a routine government action, such as visa processing, granting of permits, or customs clearance. These payments are considered illegal bribes in many jurisdictions, including those with laws applicable to Shockwave. Shockwave, Shockwave Parties and Third Parties may not make any expediting payments on behalf of or in connection with services performed for Shockwave, no matter where the business is conducted. This is true regardless of local customs in such locations.

2.4. *Red Flags.* You should be aware of "red flags" that may indicate corruption, including but not limited to the following:

- History or reputation of corruption or unethical conduct in the country where you are doing business.
- Unusual payment arrangements, including pressure to make a payment ahead of schedule; requests or offers of cash or cash equivalents; requests to pay by unusual methods, such as with travelers checks or lavish gifts; requests that payment be made in an account located in another country or in the name of a person or entity other than the third-party.
- Any request or offer of lavish entertainment or expensive gifts, or for meals, entertainment, travel or travel-related expenditures with no apparent business purpose.

- Refusal by a vendor or other third-party to contractually agree to comply with this Policy and anti-corruption laws.
- Lack of qualifications or resources on the part of the vendor or other Third-Party to perform the services offered.
- A request for a “bonus” or “special fee” or other payments contingent upon the vendor or other third party’s successful acquisition of a license, permit, approval, or obtainment of some other discretionary act.
- Fees or commissions that do not appear to relate to the value of the services provided or seem unusually high or excessive in relation to the services provided.
- A vendor or other third party’s use of a sub-agent or intermediary without informing Shockwave.
- Recommendations by government officials to hire specific vendors.
- Lack of transparency in expenses and accounting records.

2.5. *Cash Payments.* Cash payments of any kind to a third party, other than documented petty cash disbursements or other valid and approved payments, are prohibited. Shockwave checks shall not be written to “cash,” “bearer,” or anyone other than the party entitled to payment, except to replenish properly used petty cash funds.

2.6. *Compliance.*

2.6.1. All Shockwave Parties and Third-Parties must be familiar with and perform their duties according to the requirements set out in this Policy.

2.6.2. All Third-Parties are expected and required to conduct business in accordance with all applicable laws, rules, and regulations. If any Third-Party finds itself in a situation where customary conduct is inconsistent with this Policy, and/or local laws or regulations, they are expected to comply with the more stringent standard.

2.6.3. Given the serious nature of a violation of this Policy, failure to comply, whether intentional or not, in addition to any civil or criminal penalties, may lead to disciplinary action up to and including termination of employment or any contractual relationship.

2.7. *Asking Questions and Reporting Violations.*

2.7.1. If you have any questions about this Policy or any conduct, or if you become aware of any proposed or actual transaction or situation that you believe may violate anti-corruption laws or this Policy, inform your manager and Shockwave’s Legal and Compliance team. You may also contact the Shockwave Ethics Line shown on the first page of this Policy. You may act anonymously through the Shockwave Ethics Line.

2.7.2. Shockwave prohibits retaliation in any form against any persons for making good faith reports under this Policy or for cooperating with a compliance investigation, even if the investigation is not able to be substantiated.

2.7.3. All Shockwave Parties and all Third-Parties shall immediately report any known or suspected violations of this Policy, including expediting payments. Conscious disregard, deliberate ignorance, or willful blindness to circumstances is not a defense against criminal liability or disciplinary action.

3. *Gifts, Meals and Entertainment.*

3.1. Shockwave Parties and Third-Parties must be cautious when giving gifts or entertainment to, or accepting gifts or entertainment from, anyone who does or seeks to conduct business with Shockwave or such Third-Party. Giving or accepting gifts and entertainment may appear to influence the recipient's ability to make objective business decisions.

3.2. Shockwave Parties and Third Parties may provide and accept meals, entertainment, token gifts or favors to or from any non-governmental official that: (i) have a valid business purpose; (ii) do not have significant value; (iii) do not create a real or apparent sense of obligation; (iv) are customary and widely accepted in the applicable location; (v) are consistent with local laws, rules and regulations; (vi) are permitted by Shockwave's or such Third-Party's policies including Shockwave's Gifts and Entertainment Policy; and (vii) are properly reported.

3.3. Shockwave, Shockwave Parties, and Third-Parties may pay for the reasonable cost of a non-US government official's meals, lodging, or travel if, and only if, the expenses are bona fide, reasonable, and directly related to the promotion, demonstration, or explanation of Shockwave's products or the execution of a contract with a non-US government or agency.

3.4. Shockwave Parties and Third Parties may not, under any circumstances, offer anything of value to government officials with whom they are conducting or seeking to conduct business on behalf of Shockwave or before whom they are representing Shockwave.

4. *Lobbying; Political Contributions.*

4.1. Lobbying is the process of communicating Shockwave's point of view and interest in any proposed government action and attempting to persuade government officials to act in a way that we believe is appropriate for Shockwave's business and public policy. Lobbying does not include routine contact with government officials or employees in connection with normal government processes, such as regulatory audits, applications for permits, or product sales to government agencies.

4.2. In compliance with local laws, Shockwave may, from time to time, lobby representatives of various governments. Many governments, including the federal and state governments in the US, regulate the activity of lobbying. Violating these laws can result in significant civil fines or criminal charges against both the individual and Shockwave. Lobbying is broadly defined and highly regulated and what might be culturally acceptable and legal in one country might be illegal in another.

4.3. The use of Shockwave's assets for or in aid of political parties or candidates for public office is generally prohibited.

4.4. You must consult with Shockwave's General Counsel for specific guidance and prior exception approval before engaging in any lobbying activity or making any political contributions on behalf of Shockwave.

5. *Due Diligence; Record-Keeping Requirements.*

5.1. Shockwave is not only responsible for its own actions but also may be held responsible for the actions of Third-Parties that it engages to provide services or act on its behalf. In order to reduce the risks associated with these

third-parties, Shockwave, all Shockwave Parties, and all Third-Parties must exercise due diligence and take all necessary precautions to ensure that their respective business partners are reputable and qualified. All Shockwave Parties should contact the Shockwave Legal and Compliance Team for assistance with third-party due diligence.

5.2. Shockwave, all Shockwave Parties, and all Third-Parties must keep records which accurately, fairly, and completely reflect all payments, transactions, and dispositions of assets. Great care must be taken to accurately record and not to mischaracterize the reason(s) for and/or type(s) of payments being made to third parties. All Shockwave Parties and all Third-Parties are prohibited from making false, misleading, or artificial entries in their respective books and records. Shockwave will not tolerate off-the-books transactions or funds under its control that are not truthfully and completely recorded in its books. All accounting records, expense reports, invoices, and other business records must be retained, reported, and recorded in line with applicable law and regulations. All records and supporting documentation must be periodically reviewed to identify and correct discrepancies, errors, and omissions.

5.3. All Third-Parties must ensure that the data they provide to Shockwave for the preparation of financial statements, regulatory reports, and publicly filed documents complies with all applicable accepted accounting principles and the Third-Party's internal control procedures.

5.4. Shockwave may periodically audit its and any Third-Party's records to ensure that financial transactions and payments are made in accordance with Shockwave's policies.

5.5. If any person has reason to believe that any books or records related to Shockwave are being maintained in a fraudulent, inaccurate, or incomplete manner, or feels pressured to prepare, alter, conceal or destroy documents, he or she shall report these concerns immediately to Shockwave's Legal and Compliance Team or through the Shockwave Ethics Line.

[End of Policy]

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