

SHOCKWAVE MEDICAL, INC.

Policy for Reporting Concerns Related to Accounting, Auditing and Ethical Violations

Adopted February 20, 2019 (revised August 6, 2020)

The purpose of this Policy for Reporting Concerns Related to Accounting, Auditing and Ethical Violations (this “**Whistleblower Policy**” or “**Policy**”) is to reinforce the business and ethical integrity of Shockwave Medical, Inc. (the “**Company**”) by providing a safe and reliable means for employees and others to report concerns they may have about conduct at the Company. By following this Policy, you can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment. Whether you are an employee, an officer or director, an independent contractor, or someone who does business with us, we ask that you bring to light good-faith concerns regarding the Company. Towards this goal, we have adopted this policy to establish procedures for the receipt and handling of complaints as to financial or accounting matters. This Policy also includes means for employees to raise concerns with respect to any violations of the Company’s Code of Conduct and Business Ethics (the “**Code of Conduct**”).

This Policy applies to all employees, officers, directors and independent contractors of the Company and its subsidiaries, all of whom are referred to collectively as “**employees**” or “**you**” throughout this policy, and “**we,**” and “**our**” refers to the Company and its subsidiaries.

Employee Complaint Procedures

Any employee of the Company may submit a good-faith concern or complaint regarding financial statement or other disclosures, accounting, internal accounting or disclosure controls, auditing matters or violations of law or violations of the Code without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, and audit practices. Employees are encouraged to follow the procedures in this Policy and report any possible violations or questionable matters that have occurred, are ongoing or may occur.

The Audit Committee of the Company’s Board of Directors oversees employee concerns and complaints in the areas covered by this Policy.

Receipt of Employee Complaints

We encourage employees with concerns regarding financial or accounting matters or violations of our Code of Conduct to act promptly and take one or more of the following actions:

- Report your concerns to your direct manager or supervisor.
- If you are uncomfortable speaking with your manager or believe your manager has not properly handled your concern, contact the chair of the Audit Committee or the General Counsel of the Company.
- If you do not believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above contacts, report your concern on a confidential or anonymous basis to the Company’s third-party ethics hotline reporting company, NAVEX Global, by submitting a report on www.shockwavemedical.ethicspoint.com or by calling (844) 783-5397.

This Policy provides a mechanism for the Company to be made aware of any suspected wrongdoing and address them as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the

violation of a federal or state statute has occurred.

Reporting Complaints to Governmental Agency

All employees have the right to:

- Report possible violations of state or federal law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization, including in accordance with any “whistleblower” laws or regulations;
- Cooperate voluntarily with, or respond to any inquiry from, or provide testimony before any self-regulatory organization or any other federal, state or local regulatory or law enforcement authority;
- Make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, the Company; and
- Respond truthfully to a valid subpoena.

Scope of Matters Covered by These Procedures

These procedures relate to employee concerns or complaints relating to any questionable financial or accounting matter or violations of the Code of Conduct, including, without limitation, the following:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial books or records of the Company;
- deficiencies in or noncompliance with the Company’s internal controls;
- misrepresentation or false statement to or by an officer or employee regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- any attempts to mislead or improperly influence the Company’s independent auditor in the course of the performance of their audit;
- deviation from full and fair reporting of the Company’s financial condition, such as material misrepresentations or omissions with respect to the Company’s business, financial condition, results of operations or cash flows, in public disclosures of the Company’s financial position and prospective reports;
- improper use or disbursement of Company funds;
- improper use of Company property (including disclosure of confidential or proprietary information);
- use of non-public Company information to trade in securities; or
- any other violations of the Company’s Code of Conduct.

This list provides examples of the types of subjects covered by this policy and is not intended to be exhaustive. Any

employee with related concerns should raise those issues in accordance with this Policy.

Treatment of Complaints

We will take all complaints seriously and promptly and thoroughly investigate. The specific action taken in any particular situation will depend on the nature and gravity of the conduct or circumstances reported and the results of the investigation. If a concern has been reported, investigated, and confirmed, the Company will take corrective action proportionate to the seriousness of the offense. This action may include disciplinary action against the offending party, up to and including termination of employment or any other working relationship that the offending party may have with the Company. We will also take reasonable and necessary steps to prevent any further occurrence of the same or similar offense.

The following details the steps that will be taken in response to any complaint:

- Upon receipt of a complaint, the chair of the Audit Committee or the General Counsel will: (i) determine whether the complaint pertains to an accounting or auditing matter, or whether it pertains to violations of the Code or other relevant matters; and (ii) when possible, acknowledge receipt of the complaint to the sender.
- Complaints relating to accounting and auditing matters will be reviewed under Audit Committee direction and oversight by the chair of the Audit Committee or the General Counsel or such other persons as the Audit Committee determines to be appropriate.
- Complaints relating to violations of the Code of Conduct or any other matters will be reviewed initially by the chair of the Audit Committee or the General Counsel. The chair of the Audit Committee or the General Counsel may delegate the oversight of any complaint to such other persons as the chair of the Audit Committee or the General Counsel determines to be appropriate.
- After initial review, the chair of the Audit Committee or General Counsel, as applicable, will determine whether the matter warrants an investigation and, if so, will oversee any such investigation. If the matter appears to be significant, the chair of the Audit Committee or the General Counsel will discuss at any time the concerns raised with the Audit Committee.
- The person(s) authorized to conduct the investigation will report to the Audit Committee in a timely manner all findings of fact, conclusions and proposed recommendations for remedial actions, if any.
- Prompt and appropriate corrective action will be taken as and when warranted in the judgment of the Audit Committee or the General Counsel, as applicable.

Reporting and Retention of Complaints and Investigations

The chair of the Audit Committee or the General Counsel will maintain a log of all complaints, tracking their receipt, any investigation, and resolution, and shall prepare a periodic summary report on at least a semi-annual basis for the Audit Committee. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.

Confidentiality

Confidentiality will be maintained to the fullest extent possible during the course of the investigation, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law. For any concern or complaint not reported anonymously, we will advise the reporting party that the

subject of the complaint or concern has been addressed and, if we can, of the specific resolution. If you reported your concern on a confidential or anonymous basis through NAVEX Global, NAVEX Global will provide you with a mechanism to receive the report of the Company's investigation and corrective action while preserving your anonymity.

No Retaliation

We strictly prohibit and will not tolerate retaliation against any employee for reporting, either internally to the Company or to any governmental agency or entity or self-regulatory organization, information which he or she reasonably believes relates to any questionable financial or accounting matter or violations of the Code of Conduct or otherwise cooperating in an investigation of such a concern or complaint. All forms of retaliation are prohibited, including any form of adverse action, discipline, threats, intimidation, or other form of retaliation for reporting under or complying with this Policy. It is unlawful to retaliate against an employee for reporting possible misconduct either internally or to any governmental agency or entity or self-regulatory organization.

We consider retaliation a Code of Conduct violation itself, which will result in disciplinary action, up to and including termination of employment or any other working relationship with the Company. As a result, if you have been subject to any conduct that you believe constitutes retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to any report, please immediately report the alleged retaliation using the same procedures described above and we will investigate and take prompt corrective action, if appropriate.

The Audit Committee may revise or amend this policy as necessary or appropriate.