



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

### CODE OF BUSINESS CONDUCT AND ETHICS ADOPTED BY THE BOARD OF DIRECTORS DECEMBER 12, 2017

#### INTRODUCTION

We are committed to maintaining the highest standards of business conduct and ethics. This Code of Business Conduct and Ethics (the “**Code**”) reflects the business practices and principles of behavior that support this commitment. As an employee, officer or director you are responsible for reading, understanding and abiding by this Code and its application to the performance of your business responsibilities. References in the Code to employees are intended to cover officers and, as applicable, directors.

Officers, managers and other supervisors are expected to develop in employees a sense of commitment to the spirit, as well as the letter, of the Code. Supervisors are also expected to ensure that all agents and contractors conform to Code standards when working for or on behalf of SI-BONE, Inc. (the “**Company**”). The compliance environment within each supervisor’s assigned area of responsibility will be a significant factor in evaluating the quality of that individual’s performance. In addition, any employee who makes an exemplary effort to implement and uphold our legal and ethical standards will be recognized for that effort in his or her performance review. Nothing in the Code alters the at-will employment policy of the Company.

To further encourage open lines of communication, we have established a Compliance Hotline which you may access for any reason at any time, around the clock with respect to any concerns you may have with respect to compliance with this Code. In order to provide assurance of anonymity, all Hotline calls are taken by a trained third-party vendor. The toll-free numbers to call depending on your location are as follows: North America - 855-742-6631 (855-SI-BONE-1); Italy - 800-797113; Germany – dial access code 0-800-225-5288 then, when prompted, enter 855-742-6631; United Kingdom – 0808-234-1103. If you are outside of these countries, or if you prefer to use the internet, you may voice your concerns by filling out the form available at [www.sibone.ethicspoint.com](http://www.sibone.ethicspoint.com). If accessing via mobile device or tablet, the form is best accessed at <https://sibone.navexone.com/>.

The Code addresses conduct that is particularly important to proper dealings with the people and entities with whom we interact, but reflects only a part of our commitment. From time to time we may adopt additional policies and procedures with which our employees, officers and directors are expected to comply, if applicable to them. You are further expected to comply in full with the AdvaMed Code of Ethics on Interactions with Health Care Professionals (“AdvaMed Code”) and if you are in the European Union, with the MedTech Europe Code of Ethical Business Practice (the “MedTech Code”) as applicable. Ultimately, however, it is the responsibility of each employee to apply common sense, together with his or her own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code.

Action by members of your immediate family, significant others or other persons who live in your household (referred to in the Code as “**family members**”) also may potentially result in ethical issues to the extent that they involve Company business. For example, acceptance of inappropriate



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

gifts by a family member from one of our suppliers could create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with the Code, you should consider not only your own conduct, but also that of your family members, significant others and other persons who live in your household.

**YOU SHOULD NOT HESITATE TO ASK QUESTIONS ABOUT WHETHER ANY CONDUCT MAY VIOLATE THE CODE, VOICE CONCERNS OR CLARIFY GRAY AREAS. SECTION 22 BELOW DETAILS THE COMPLIANCE RESOURCES AVAILABLE TO YOU. IN ADDITION, YOU SHOULD BE ALERT TO POSSIBLE VIOLATIONS OF THE CODE BY OTHERS AND REPORT SUSPECTED VIOLATIONS, WITHOUT FEAR OF ANY FORM OF RETALIATION, AS FURTHER DESCRIBED IN SECTION 22.** Violations of the Code will not be tolerated. Any employee who violates the standards in the Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

### **1. *Honest and Ethical Conduct***

It is the policy of the Company to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity is the foundation of corporate integrity.

### **2. *Legal Compliance***

Obedying the law, both in letter and in spirit, is the foundation of this Code. Our success depends upon each employee operating within legal guidelines and cooperating with local, national and international authorities. We expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. We hold periodic training sessions to ensure that all employees comply with the relevant laws, rules and regulations associated with their employment. While we do not expect you to memorize every detail of these laws, rules and regulations, we do want you to be able to determine when to seek advice from others. If you do have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your supervisor or the Chief Compliance Officer (as further described in Section 22).

Disregard of the law will not be tolerated. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

### **3. *No Discrimination or Harassment***

We are committed to providing a work environment that is free of discrimination and harassment. The Company is an equal opportunity employer and makes employment decisions on the basis of merit and business needs. In addition, the Company strictly prohibits harassment of any kind, including harassment on the basis of race, color, veteran status, religion, gender, sex, sexual



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

orientation, age, mental or physical disability, medical condition, national origin, marital status or any other characteristics protected under federal or state law or local ordinance.

### **4. *Insider Trading***

Employees who have access to confidential (or “inside”) information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All non-public information about the Company or about companies with which we do business is considered confidential information. To use material non-public information in connection with buying or selling securities, including “tipping” others who might make an investment decision on the basis of this information, is not only unethical, it is illegal. Employees must exercise the utmost care when handling material inside information.

### **5. *International Business Laws***

Our employees are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;
- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with countries, or traveling to, subject to sanctions imposed by the U.S. government (currently, Burma, Cuba, Iran, North Korea, Sudan and Syria), as well as specific companies and individuals identified on lists published by the U.S. Treasury Department;
- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibits transfers of U.S.-origin items to denied persons and entities; and
- Antiboycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

If you have a question as to whether an activity is restricted or prohibited, seek assistance before taking any action, including giving any verbal assurances that might be regulated by international laws.

### **6. *Antitrust***

Antitrust laws are designed to protect the competitive process. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit:

- agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;
- agreements, formal or informal, that establish or fix the price at which a customer may resell a product; and
- the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

Certain kinds of information, such as pricing, production and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the Compliance Officer whenever you have a question relating to these laws.

### **7. *Environmental Compliance***

Federal law imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.

It is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We are committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

### **8. *Conflicts of Interest***

We respect the rights of our employees to manage their personal affairs and investments and



**CODE OF BUSINESS CONDUCT  
AND ETHICS**

Effective Date: 12/01/2020

do not wish to impinge on their personal lives. At the same time, employees should avoid any actual or perceived conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of the Company. A conflict of interest exists when a person's private interest may influence or interfere with (or even appear to interfere with) any interest of the Company. For instance, a conflicting personal interest could result from any expectation of personal gain now or in the future or from a person's need to satisfy a prior or concurrent personal obligation. We expect our employees to be free from influences that conflict (or appear to conflict) with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of the Company, you should discuss the matter with your supervisor or the Chief Compliance Officer. Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Chief Compliance Officer and providing the Chief Compliance Officer with a written description of the activity. If a supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Chief Compliance Officer. Officers and directors may seek authorizations and determinations from the Company's Audit Committee. The Company may take into consideration any factor when considering whether a conflict of interest may exist and may rescind prior approvals at any time to avoid a conflict of interest, or the appearance of a conflict of interest, for any reason deemed to be in the best interest of the Company.

Evaluating whether a conflict of interest exists, or may appear to exist, requires the consideration of many factors, including but not limited to:

- whether it may interfere with the employee's job performance, responsibilities or morale;
- whether the employee has access to confidential information;
- whether it may interfere with the job performance, responsibilities or morale of others within the organization;
- any potential adverse or beneficial impact on our business;
- any potential adverse or beneficial impact on our relationships with our customers or suppliers or other service providers;
- whether it would enhance or support a competitor's position;
- the extent to which it would result in financial or other benefit (direct or indirect) to the employee;
- the extent to which it would result in financial or other benefit (direct or indirect) to one of our customers, suppliers or other service providers; and



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

- the extent to which it would appear improper to an outside observer.

### **9. *Corporate Opportunities***

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by your supervisor, the Chief Compliance Officer or the Audit Committee, as described in Section 8 above. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

### **10. *Maintenance of Corporate Books; Financial Integrity***

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- transactions be supported by appropriate documentation;
- the terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- employees comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

Our accounting records are also relied upon to produce reports for our management, stockholders and creditors, as well as for governmental agencies. Employees who collect, provide or analyze information for or otherwise contribute in any way in preparing or verifying our accounting reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company that would be important to enable our management, stockholders and potential investors to assess the soundness and risks of our business



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

and finances and the quality and integrity of our accounting and disclosures. In addition:

- no employee may take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles or applicable laws, rules and regulations;
- all employees must cooperate fully with our Finance and Accounting Department, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records are accurate and complete; and
- no employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our financial reports or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any employee who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor, the Chief Compliance Officer, the Audit Committee of the Board or one of the other compliance resources described in Section 22 on reporting complaints regarding accounting and auditing matters.

### **11. *Fair Dealing***

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Chief Compliance Officer, as further described in Section 22.

You are expected to deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job. Be aware that the Federal Trade Commission Act provides that “unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful.” It is a violation of the Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.





## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

### 12. *Gifts and Entertainment*

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage with customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is not extravagant. Unless express permission is received from a supervisor, the Chief Compliance Officer or the Audit Committee, gifts and entertainment cannot be offered, provided or accepted by any employee unless consistent with customary business practices and not (a) of more than token or nominal monetary value, (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis or (e) in violation of any laws, **provided, however, that this Section 12 does not apply to Health Care Professionals.** This principle applies to our transactions everywhere in the world, even where the practice is widely considered “a way of doing business.” Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers and the public at large should know that our employees’ judgment is not for sale.

### 13. *Working with Governments*

#### *Overview*

Special rules govern our business and other dealings with governments. Employees, agents and contractors of the Company should use all reasonable efforts to comply with all applicable laws and regulations governing contact and dealings with governments, government employees and public officials. If you deal with governments, government employees or public officials, you should undertake to understand the special rules that apply. If you have any questions concerning government relations, you should contact the Chief Compliance Officer.

#### *Government Contracts*

You should use all reasonable efforts to comply with all relevant laws and regulations that apply to government contracting. You should refer all contracts with any governmental entity to the Chief Compliance Officer for review and approval.

#### *Requests by Regulatory Authorities*

You must cooperate with appropriate government inquiries and investigations in accordance with law. It is important, however, to protect the legal rights of the Company with respect to its nonpublic information. All government requests for Company information, documents or investigative interviews should be referred to the General Counsel. You should work with the Chief Executive Officer, Chief Financial Officer, General Counsel and Vice President of Regulatory Affairs in responding to requests by regulatory authorities to ensure adequate and complete responses and to avoid improper disclosure of attorney-client privileged materials, trade secret information or other nonpublic information. This policy should not be construed to prevent an employee from disclosing information to a government or law enforcement agency, where the employee has reasonable cause





## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

to believe that the information discloses a violation of, or noncompliance with, a state or federal statute or regulation.

### *Improper Payments to Government Officials*

You may not offer any payment or business amenity to a public official or a government employee if doing so could reasonably be construed as having any connection with the Company's business, even if it has a nominal value or no value at all. You should be aware that what may be permissible in dealings with commercial businesses may be deemed illegal and possibly criminal in dealings with the government. You should contact the Chief Compliance Officer for guidance.

### *Political Contributions*

The Company reserves the right to communicate its position on important issues to elected representatives and other government officials. It is the Company's policy to comply fully with all local, state, federal, foreign and other applicable laws, rules and regulations regarding political contributions. The Company's assets—including Company funds, employees' work time and Company premises and equipment—must not be used for, or be contributed to, political campaigns or political activities under any circumstances without prior written approval.

### *Lobbying*

You must obtain approval from the President/CEO for any work activity that requires lobbying communication with any member or employee of a legislative body or with any government official or employee in the formulation of legislation. Work activity covered by this policy includes meetings with legislators or members of their staffs or with senior executive branch officials on behalf of the Company. Preparation, research and other background activities that are done in support of such lobbying communication are also covered by this policy even if the communication ultimately is not made.

## **14. Protection and Proper Use of Company Assets**

All employees are expected to protect our corporate assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. Our property, such as office supplies, computer equipment, and buildings, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. In particular, appropriate use of our corporate information technology assets such as laptops, mobile devices, computers and other technology must be performed to ensure their appropriate use and not in violation of any of the Company's other applicable policies. Waste, damage or misuse of corporate assets by any employee will not be tolerated and may subject you to further discipline.

## **15. Confidentiality**

One of our most important assets is our confidential information. As an employee of the Company, you may learn of information about the Company that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees



## **CODE OF BUSINESS CONDUCT AND ETHICS**

Effective Date: 12/01/2020

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 the Company or its customers if disclosed, such as business plans, scientific and technical strategies, financial information, information related to the Company's research, testing platforms and sequencing methods, data and results, inventions, works of authorship, trade secrets, processes, conceptions, formulas, patents, patent applications, licenses, suppliers, manufacturers, customers, market data, 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. This information may be protected by patent, trademark, copyright and trade secret laws.

In addition, because we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat our confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

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, a public disclosure or a formal public 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 here, until that information is disclosed to the public through approved channels. This policy requires you to refrain from discussing confidential or proprietary information with outsiders and even with other employees of the Company, unless those fellow employees have a legitimate need to know the information in order to perform their job duties. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks 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. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas in and around our place of business. All Company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company except where required for legitimate business purposes.

In addition to the above responsibilities, if you are handling information protected by any privacy policy published by us, such as our website privacy policy, then you must handle that information in accordance with the applicable policy.



**CODE OF BUSINESS CONDUCT  
AND ETHICS**

Effective Date: 12/01/2020

**16. *Media/Public Discussions***

It is our policy to disclose material information concerning SI-BONE, Inc. to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the company will have equal access to information. All inquiries or calls from the press and financial analysts should be referred to the Company's Chief Executive Officer, President and Chief Operating Officer or Chief Financial Officer. We have designated our CEO and CFO as our official spokespersons for financial matters. We have designated our CEO, President and CFO as our official spokespersons for scientific, clinical, technical and other related information. Unless a specific exception has been made by the CEO, President or CFO, these designees are the only people who may communicate with the press on behalf of the Company. You also may not provide any information to the media about us off the record, for background, confidentially or secretly.

**17. *Health Care Professional Interactions***

The Company is firmly committed to complying with all laws and regulations governing its interactions with Health Care Professionals. Agents and employees of the Company 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, Company products. The term "Health Care Professional" or "HCP" means 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 the Company'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.

To further this commitment, we have adopted various voluntary industry codes relating to ethical interactions with Health Care Professionals, including the AdvaMed Code and MedTech Code.

**18. *Clinical Trials***

We conduct clinical trials in accordance with all applicable laws and regulations, as well as internationally recognized standards of Good Clinical Practice. Investigators for our clinical trials are selected based on qualifications, training, and clinical expertise in relevant fields, the potential to recruit research participants and ability to conduct clinical trials in accordance with recognized standards of Good Clinical Practice and applicable legal requirements. We respect the independence of the individuals and entities involved in the clinical research process so that they can exercise their judgment to protect research participants and to ensure an objective and balanced interpretation of trial results and publication of trial results in accordance with applicable legal requirements and International Committee of Medical Journal Editors standards. Our interactions with them will not interfere with this independence.

Payment to clinical investigators and/or their institutions will be reasonable, will not be in excess of fair market value, and will be based on work performed by the investigator and the investigator's staff, not on any other considerations. No payments or compensation of any sort will be tied to the outcome of clinical trials. When required, necessary and/or appropriate, we will obligate our clinical trial investigators and all others conducting our research, to disclose their



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

relationships with us to patients, their employers, societies, institutions, journals, the public, and others.

### **19. Patient Information; Product Quality**

#### *Patient Information*

Patient information must not be accessed, removed, discussed with, or disclosed to unauthorized persons, either within or outside the Company, without proper consent. All individuals having access to confidential patient information are bound by strict ethical and legal restrictions on the release of medical data. No individual therefore may disclose to a third party, including his/her own family, information learned from medical records, patient accounts, management information systems, or any other confidential sources during the course of his/her work. No individual may access confidential information which they do not have a “need to know” to carry out their job duties. Individuals may not access, release, or discuss the medical information of others without proper consent, unless the individual must do so to carry out specific assigned job functions.

#### *Product Quality*

We are committed to providing innovative products and services that meet customer requirements and expectations. We also strive to continually improve the effectiveness of our quality management system. In order to deliver quality products and services, we comply with all applicable regulations and voluntary International Organization for Standardization (ISO) standards for quality systems. Our employees play a key role in continually improving our quality systems and processes. In the event you become aware of any issues that may affect the quality or safety of our products, instruments and services you are expected to notify our quality management group at (qa@si-bone.com; 855-884-3873 or 1-408-207-0700).

### **20. Marketing and Advertising**

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.

Generally speaking, a “promotion” or “promotional material” can be quite broad. For instance, a promotion is any representation (or anything that could be perceived as a representation) of the risks, benefits, performance, outcomes, or specifications of our products or services and can occur during seminars, trade shows, customer site visits, and interviews. “Promotional material” can include also any number of things used for “promotion” including, but not limited to, posters, copies of journal articles, press releases, patient testimonials, graphics, tags, pamphlets, letters, mailing pieces, presentations, brochures, instruction books, videos, audio recordings and web based materials or content.

All promotional materials and promotions must be approved in advance in accordance with our standard operating procedures. Furthermore, all promotions must be consistent with approved instruction for use for our products. We do not tolerate, or market our products for, any “off-label” promotion or in any fashion other than in accordance with their instruction for use. This includes



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

providing Health Care Professionals with verbal or written information relating to techniques or treatment outcomes other than in accordance with our instruction for use. Furthermore, we do not tolerate or permit any employee to provide advice or guidance to any other person or entity, including any customer or Health Care Professional with respect to matters related to health care coding or reimbursement.

### **21. Waivers; Conflicts**

#### *Waivers*

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or, to the extent permitted and applicable, by the rules of any public exchange where we may be listed and our Corporate Governance Guidelines, a committee of the Board and will be disclosed to stockholders as required by applicable laws, rules and regulations.

#### *Conflicts*

This Code provides guidance regarding applicable laws and regulations where the Company operates; however, such laws and regulations are often complex and vary from country to country. If a conflict exists between the Code and any law or regulation, the most restrictive applies. Any employee who believe a conflict exists between this Code and applicable law or regulation and/or are unsure how to proceed should contact the Chief Compliance Officer.

### **22. Compliance Standards and Procedures**

#### *Compliance Resources*

To facilitate compliance with this Code and other Company compliance policies, we have implemented a program of Code awareness, training and review. We have appointed a Chief Compliance Officer to oversee this program. The Chief Compliance Officer is a person to whom you can address any questions or concerns. In addition to fielding questions or concerns with respect to potential violations of this Code, the Chief Compliance Officer is responsible for:

- investigating possible violations of the Code;
- training new employees in Code policies;
- conducting annual training sessions to refresh employees' familiarity with the Code;
- distributing copies of the Code annually via the Company's secure learning management system to each employee with a reminder that each employee is responsible for reading, understanding and complying with the Code;



## CODE OF BUSINESS CONDUCT AND ETHICS

Effective Date: 12/01/2020

- updating the Code as needed and alerting employees to any updates, with appropriate approval of the Board of Directors, as appropriate, to reflect changes in the law, Company operations and in recognized best practices, and to reflect the Company's experience; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

Your most immediate resource for any matter related to the Code is your supervisor. He or she may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with the Chief Compliance Officer. If you are uncomfortable speaking with the Chief Compliance Officer because he or she works in your department or is one of your supervisors, please contact the Chief Executive Officer. Of course, if your concern involves potential misconduct by another person and relates to questionable accounting or auditing matters under the Company's Whistleblower Policy, you may report that violation as set forth in such policy.

### *Clarifying Questions and Concerns; Reporting Possible Violations*

If you encounter a situation or are considering a course of action and its appropriateness is unclear, discuss the matter promptly with your supervisor or the Chief Compliance Officer; even the appearance of impropriety can be very damaging and should be avoided.

If you are aware of a suspected or actual violation of laws, regulations, the Code or any other Company policy, you have a responsibility to report it. You are expected to promptly provide a compliance resource with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation. Further, the Company encourages and expects each of us to report when we feel we are being pressured to compromise standards that may lead to a potential violation. Please report these matters directly to your manager, Compliance ([compliance@si-bone.com](mailto:compliance@si-bone.com)) or Human Resources ([hr@si-bone.com](mailto:hr@si-bone.com)). We will take prompt disciplinary action against any employee who retaliates against you, including termination of employment.

Whether you choose to speak with your supervisor or the Chief Compliance Officer, you should do so without fear of any form of retaliation. The Company does not tolerate retaliation in any form against anyone who in good faith reports suspected violations or unethical behavior or who participates in an investigation regarding suspected violations or unethical behavior. If you feel that you have been retaliated against in any manner whatsoever, please notify Compliance ([compliance@si-bone.com](mailto:compliance@si-bone.com)) or Human Resources ([hr@si-bone.com](mailto:hr@si-bone.com)) immediately. Those who engage in retaliation will be subject to disciplinary action up to and including termination.

If for any reason you do not wish to discuss suspected violations or unethical behavior directly with the Company, please contact the Company's Toll-Free Hotline. Calls may be made for any reason at any time, around the clock. In order to provide additional assurance of anonymity, all Hotline calls are taken by a trained third-party vendor. The toll-free numbers to call depending on your location are as follows: North America - 855-742-6631 (855-SI-BONE-1); Italy - 800-797113; Germany – dial access code 0-800-225-5288 then, when prompted, enter 855-742-6631; United



**CODE OF BUSINESS CONDUCT  
AND ETHICS**

Effective Date: 12/01/2020

Kingdom – 0808-234-1103. If you are outside of these countries, or if you prefer to use the internet, you may voice your concerns by filling out the form available at [www.sibone.ethicspoint.com](http://www.sibone.ethicspoint.com). If accessing via mobile device or tablet, the form is best accessed at <https://sibone.navexone.com/>.

Supervisors must promptly report any complaints or observations of Code violations to the Chief Compliance Officer. If you believe your supervisor has not taken appropriate action, you should contact the Chief Compliance Officer directly. The Chief Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your supervisor may conduct any preliminary investigation, unless authorized to do so by the Chief Compliance Officer. Your cooperation in the investigation will be expected. As needed, the Chief Compliance Officer will consult with legal counsel, the Human Resources department and/or Audit Committee of the Board of Directors. It is our policy to employ a fair process by which to determine violations of the Code.

With respect to any complaints or observations of violations that may involve accounting, internal accounting controls and auditing concerns, under the Company's Whistleblower Policy, the Chief Compliance Officer shall promptly inform the Audit Committee, and the Audit Committee shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken. If a potential violation is reported via the confidential hotline or email address as provided under the Whistleblower Policy, the Audit Committee will be notified automatically and directly.

If any investigation indicates that a violation of the Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.