



SUPPLIER CODE OF CONDUCT

Effective Date: 07/25/2022

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INTRODUCTION

SI-BONE, Inc. and its affiliates (collectively, “SI-BONE,” “we,” “our,” or “us”) are committed to corporate integrity, responsible product sourcing, and the safety and well-being of workers across the global supply chain. We strive to select manufacturers, suppliers, and vendors (each, a “Supplier”) that share these commitments. This Supplier Code of Conduct (“Code”) is intended to establish minimum standards for our Suppliers.

We expect our Suppliers to immediately notify SI-BONE of any actual or potential violations of this Code by emailing compliance@si-bone.com or by filing a whistleblower report (see contact information at end of Code).

The Code supplements but does not supersede any contractual requirements. Suppliers and their subcontractors must comply with the Code. If a Supplier is found to be in violation of the Code, SI-BONE will take appropriate measures to address the violations. SI-BONE reserves the right to terminate its relationship with any Supplier for failure to comply with the Code.

The provision of medical devices is regulated and monitored by a variety of government agencies around the world. SI-BONE requires all Suppliers to understand and comply with laws, regulations, and government directives that apply to their business activities (“Laws”).

This Code is posted on the SI-BONE website and may be updated periodically at SI-BONE’s discretion.

RISK MANAGEMENT SYSTEMS

Our Suppliers shall develop and maintain processes designed to ensure compliance with this Code and all Laws, and to identify and mitigate risks in areas addressed by this Code. Suppliers are also expected to create and maintain an anonymous complaint reporting system for managers and workers to report workplace complaints. Suppliers are expected to protect whistleblower confidentiality and prohibit retaliation.

BUSINESS PARTNER INTERACTIONS

Our Suppliers shall conduct their business interactions in a lawful and ethical manner.

- **Legal compliance:** Suppliers will fully comply with all applicable Laws.
- **Fair competition:** Suppliers will conduct their business fairly, ethically and in compliance with all antitrust and fair competition Laws regulating competition and trade in each jurisdiction in which they operate.
- **Conflicts of Interest:** Suppliers will not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, or obligations to SI-BONE. Suppliers and their personnel shall not deal directly, in the course of negotiating an agreement or performing their obligations for us, with any of our employees or their spouses,



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domestic partners, or other family members or relatives who may receive a personal benefit as a result of the Supplier's work with us.

- **Bribery / Corruption:** Suppliers will comply with applicable anti-corruption Laws, including but not limited to the United States Foreign Corrupt Practices Act, the United Kingdom Bribery Act, and the U.S. Anti-Kickback Statute, and not offer anything of value, either directly or indirectly, to government officials in order to obtain or retain business. Suppliers will not make illegal payments to government officials themselves or through a third party.
- **Recording and reporting information:** Suppliers will record and report all information accurately and honestly. Suppliers will disclose information regarding its business activities, without falsification or misrepresentation, to all appropriate parties and as required by applicable Laws.
- **Gifts & entertainment:** Suppliers will not offer or accept anything of value from business partners to obtain unfair business advantages. Any gifts or entertainment must comply with applicable Laws and SI-BONE policies which require that (a) gifts and entertainment cannot be offered, provided or accepted unless consistent with customary business practices and (b) not (i) more than token or nominal monetary value, (ii) in cash, (iii) susceptible of being construed as a bribe or kickback, or (iv) made or received on a regular or frequent basis.
- **Insider Trading:** Suppliers will ensure that they do not buy or sell our or another company's securities when in possession of information about us or another company that is not available to the investing public and that could influence an investor's decision to buy or sell such security.

HUMAN RIGHTS, LABOR, EMPLOYMENT

Our Suppliers shall respect human rights by avoiding infringing on the human rights of others and addressing adverse human rights impacts with which they are involved.

- **Nondiscrimination:** Suppliers will maintain a workplace that is free from discrimination and harassment based on race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, gender identity or expression, or other status protected under applicable Laws.
- **Child labor:** Suppliers will not use child labor. Suppliers will comply with all applicable child labor Laws, including those addressing limitations on age and types of permissible work.
- **Forced labor:** Suppliers will not use any form of involuntary or forced labor, including, but not limited to, prison labor, and shall not engage in any practice that constitutes trafficking in persons or slavery.
- **Freedom of movement:** Suppliers will not place any unreasonable restrictions on the ability of employees to leave the workplace or to terminate employment, including holding original copies of employee identification documents (passports or other identity papers).



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- **Fair treatment:** All workers will be treated with respect and dignity. Suppliers will not engage in or permit physical, verbal, or psychological abuse or coercion, including threats of violence or sexual harassment.
- **Immigration:** Suppliers will comply with applicable immigration Laws and regulations in any jurisdiction where they operate and only employ workers with a legal right to work in the relevant location.
- **Wages and benefits:** Suppliers will comply with all applicable wage and hour Laws and regulations, including those relating to minimum wages, overtime hours, piece rates and proper classification, and provide legally required benefits.
- **Freedom of association:** Suppliers will respect the rights of workers to establish and join a legal organization of their own selection. Workers will not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.

WORKPLACE HEALTH AND SAFETY

Suppliers shall ensure the health and safety of their workplace.

- **Work environment:** Suppliers will comply with all applicable safety and health Laws and regulations in the countries in which they operate including, where appropriate, addressing occupational injury and illness, emergency preparedness, and occupational safety. Suppliers are expected to provide employees with a healthy and safe workplace, including access to clean, safe and reasonable working conditions.
- **Hazardous substances:** Suppliers will comply with all applicable environmental Laws and regulations regarding waste, hazardous or toxic materials and identify and disclose to us all chemicals in products that are regulated by a government or other authority in the applicable jurisdiction where they are being used. Suppliers should protect workers from exposure to chemical, biological, and physical hazards, in addition to on-site accidents.
- **Security:** Suppliers will provide measures necessary for physical security at all its facilities. Additionally, our Suppliers must comply with our security procedures when at our facilities.

ENVIRONMENT

Suppliers shall recognize their responsibility to the environment and seek to enhance their environmental performance.

- **Environment:** Suppliers will comply with all Laws regarding the environment and the use of restricted substances in the jurisdictions in which they operate. Where possible, Suppliers should identify and implement practices to conserve natural resources, reduce waste, increase recycling, enhance energy conservation, and mitigate greenhouse gas impacts.



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- **Environmental permits & recordkeeping:** Suppliers will obtain and keep current all required environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.
- **Hazardous substances:** Suppliers will comply with all applicable environmental Laws and regulations regarding waste, hazardous or toxic materials. Suppliers are expected to train employees on how to handle hazardous materials per local and state regulations. Suppliers should make efforts to decrease the use of hazardous or toxic materials including, where possible, implementation of focused reduction initiatives and use of less hazardous alternatives.

CONFLICT MINERALS

Conflict minerals include tin, tantalum, tungsten, and gold mined in the Democratic Republic of the Congo (DRC) and adjoining countries. Suppliers must disclose the use of conflict minerals in products it manufactures or contracts to manufacture, if the minerals are necessary to the functionality or production of the product. Suppliers must source conflict minerals in accordance with applicable Laws. Supplier must conduct the appropriate due diligence within its supply chain to determine the origin of the conflict materials. Furthermore, Suppliers must meet the conflict reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

INTELLECTUAL PROPERTY AND DATA

Suppliers shall respect and protect our intellectual property, shared data, and confidential information.

- **Intellectual property:** Suppliers will respect intellectual property rights of SI-BONE, including patents, trade secrets, trademarks, copyrights and equivalent rights, and comply with SI-BONE's requirements governing their use. Suppliers will not, without our consent, disclose to others or use for their own purposes, our intellectual property, or confidential or proprietary information. Our Suppliers will not provide us with the confidential information of third parties, without first obtaining appropriate consent from the relevant third party.
- **Data privacy:** Suppliers will take the appropriate steps to process personal information in compliance with all applicable legal requirements. Suppliers will respect the privacy of individual's personal information and adopt adequate technical and organizational measures necessary to secure personal information and to prevent unauthorized access, alteration or loss.

COMPLIANCE/ REPORTING

It is the responsibility of Suppliers to maintain records or documentation to demonstrate compliance with the Code. SI-BONE may engage in monitoring activities to confirm Supplier compliance with this Code. Supplier shall cooperate with audits or due diligence activities conducted by SI-BONE or on SI-BONE's behalf, to ensure compliance to the requirements outlined in the Code. In addition to any



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other rights we may have under our agreement with our Suppliers, if we determine or believe that at any time a Supplier or their Representatives have failed to comply with the standards set forth in this Code, then we have the right to cease our relationship with that Supplier without notice and without liability or obligation of any sort accruing to us.

Suppliers may report concerns with respect to compliance with this Code by emailing compliance@si-bone.com or submitting an anonymous report to SI-BONE's Compliance Hotline.

- Toll-free numbers, based on the caller's location:
 - 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
- Internet: www.sibone.ethicspoint.com
- Mobile device or tablet: <https://sibone.navexone.com/>

ADDITIONAL INFORMATION

For additional information on SI-BONE's corporate policies, please visit our Corporate Governance website at <https://investor.si-bone.com/corporate-governance/governance-highlights>.