

2023
Corporate
Responsibility
Report





From the very first days of Silk Road Medical and continuing through to today, our company remains fully dedicated to the prevention of stroke and to the health and well-being of people with carotid artery disease. Understanding the devastation that stroke can have on an individual and their family, we are passionate about providing an innovative solution that reduces the risk. Fundamentally, we are in this business to transform and improve lives.

We are passionate about serving patients and the doctors who use our products yet have an equally strong commitment to our dedicated employees, our community and running our business in an ethical and compliant way.

These deep commitments, taken together, have led to strong financial results, an increase in research and development investment to further advance our product portfolio, world-class physician training, outstanding clinical results, and a strong team of talented and dedicated employees.

As we grow as a company, we continue to focus on the areas of environment, social and governance that support our goal of being a socially responsible organization. I am pleased to provide this report describing our progress.

Sincerely,

A handwritten signature in black ink, appearing to read 'ERogers' with a heart symbol at the end.

Erica Rogers
President & CEO

> Table of Contents

Company Overview	4
About this Report	5
Social Initiatives at Silk Road Medical	5
Building and Supporting an Amazing Team	6
Cartwheel Culture	7
Commitment to Diversity and Inclusion	8
Commitment to a Workplace Free of Discrimination and Harassment	9
Commitment to Freedom of Association	9
Commitment to Creating a Safe, Healthy and Secure Work Environment	10
Commitment to Competitive and Fair Compensation	10
Commitment to Learning and Development	11
Field Force Training	11
New Hire Training	12
Employee and Leadership Development Training	12
Commitment to the Health and Wellbeing of our Employees	12
Access to Healthcare	13
Commitment to Training and Education of Physicians	13
Commitment to Patient Safety	14
Commitment to Fair Pricing and Access	15
Commitment to Compliance with Federal Policy on use of Animals in R&D efforts	15
Ethics and Compliance	16
Comprehensive Compliance Program	16
Dedication to Quality and Patient Safety	17
Post-Market Activities	18
Commitment to Strong Supplier Partnerships	18
Conflict Minerals Policy Statement	20
Commitment to the Environment	20
Environmental Impact - All Silk Road Medical Operations	20
Business, Production, Packaging, and Chemical Waste, Recycling and Reuse - All Silk Road Medical Operations	21
Electronic Waste	22
Silk Road Medical SASB Index	22

> Company Overview

We are a medical device company focused on reducing the risk of stroke and its devastating impact. We believe a key to stroke prevention is minimally-invasive and technologically advanced intervention to safely and effectively treat carotid artery disease, one of the leading causes of stroke. Our business is focused on a relatively new approach for the treatment of carotid artery disease called transcatheter artery revascularization, or TCAR, which we seek to establish as the standard of care.

TCAR relies on two novel concepts - minimally-invasive direct carotid access in the neck and high-rate blood flow reversal during the procedure to protect the brain - and combines the benefits of innovative endovascular techniques with fundamental surgical principles. TCAR using our portfolio of products has been clinically demonstrated to reduce the upfront morbidity and mortality risks commonly associated with carotid endarterectomy while maintaining a reduction in long-term stroke risk.

In the second quarter of 2022, we announced FDA label and Medicare coverage expansions for the use of TCAR in standard surgical risk patients. As of December 31, 2022, more than 60,000 TCAR procedures have been performed globally, including more than 19,500 in the United States during 2022 alone.

As a company, we work tirelessly to serve patients and support the doctors using our products. We combine a deep commitment to quality and safety, world-class physician training, outstanding clinical results, significant investment in research and development, and a strong team of talented and dedicated employees to make a difference in the lives of individuals at risk for stroke. Our employees are guided by our North Star, working together to provide our products and physician support to achieve the best possible patient outcomes with a dedicated focus on patient safety.



> About this Report

Our Corporate Responsibility Report represents the latest steps on our Environmental, Social, and Governance (“ESG”) journey and our commitment to transparency around these important topics.

The topics we cover in this Corporate Responsibility report are generally aligned with the material topics identified by the Sustainability Accounting Standards Board (SASB) for the Medical Equipment and Supplies industry. However, Silk Road Medical is not a SASB reporting company. The determination of the topics covered below is based on two factors: (i) sector-specific guidance provided by SASB and (ii) periodic assessments of sustainability issues that matter most to our stakeholders and our business. We will continue to evaluate these topics in the future and, accordingly, our disclosure may evolve over time.



> Social Initiatives at Silk Road Medical



Through our corporate philanthropy program, Lend a Hand, Silk Road Medical is committed to supporting social causes and educational initiatives that help build stronger and healthier communities. We do this through monetary donations to national and local organizations aligned with our commitment to preventing stroke and providing quality health care to the community. In addition, we provide scholarship funds to help traditionally underrepresented groups pursue education in science or engineering.

Our employees are also dedicated to providing volunteer time and donations to local efforts that benefit the communities in which we

work. The company has been involved in various projects over the years, including holiday gift drives, school backpack drives, bike building for underprivileged children, Earth Day clean-ups, and handmaking blankets donated to a local rehabilitation and healthcare center near our Sunnyvale headquarters.



> Building and Supporting an Amazing Team

We understand the commitment our employees make to our company and we take our commitment to them very seriously. Silk Road Medical strives to create a work environment in which everyone is empowered to develop, to contribute, and to thrive.

Silk Road Medical has been certified as a Great Place to Work® in 2021, 2022, and 2023, a Best Workplace in the Bay Area in 2022, and a Best Workplace in BioPharma in 2022.

The Great Place to Work® certification is the only recognition based entirely on what employees report about their workplace experience. 97% of our employees said Silk Road Medical is a great place to work in our most recent survey, compared to 57% of employees at a typical U.S.-based company according to a Great Place To Work® 2021 Global Employee Engagement Study. We take pride in our company culture to ensure a sense of support and family among our employees.

**97% OF ENGAGEMENT SURVEY
RESPONDENTS SAID SILK
ROAD MEDICAL IS A GREAT
PLACE TO WORK**

Our workforce consists of a highly skilled, diverse, and engaged team dedicated to the company's mission and goals. As of December 31, 2022, we had 414 active employees, all located within the United States, of whom 232 employees

were engaged in sales, general and administrative activities, 87 were engaged in research and development activities, and 95 were engaged in manufacturing operations. During 2022, the number of employees increased by 65, or nearly 18%. None of our employees are represented by a labor union, and we have never experienced any employment-related work stoppages. We consider our relationship with our employees to be good.

As of December 31, 2022, 27% of our employees had been with Silk Road Medical for more than four years. While fluctuations may occur within our workforce from time to time, we track and attempt to manage our attrition rates and also analyze employee departure data so that we can continually improve upon our employee experience. During 2022, our employee turnover rate related to voluntary terminations was approximately 11%, the same rate as 2021.



Cartwheel Culture

We strongly believe our corporate culture is the operating system that powers the company. We talk about it, obsess over it, and have even given it a name – Cartwheel Culture.



Our Cartwheel Culture is uniquely ours and it's one we love and nurture every day. It provides a shared set of beliefs that drives everyday behaviors. These include:



Courage: We think big. We act boldly. We take on new challenges. We challenge ourselves and our colleagues to try new things that are difficult. We take smart risks. We explore new ideas and do things differently.



Focus on Core Strength: We unleash our strengths and shore up weaknesses in our company, in every department and in each member of TCAR Nation.



Flexibility: We view opportunities and challenge from all angles...even upside down. We explore all possibilities and are both willing and able to respond to changing circumstances and expectations. We make it a priority to listen and understand other people's ideas and viewpoints.



Lend a Hand: We actively support each other to achieve our common goal. Teamwork Matters.



Persistence: We believe that innovation comes from persistence and learning from our mistakes. We are persistent in the pursuit of our goals and believe that it's better to try and sometimes fail than to sit tight and fail for sure. We learn from the mistakes we make and move forward.

We monitor employee satisfaction and engagement in our day-to-day interactions with our team and conduct an annual engagement survey. Results of the engagement survey are measured and analyzed to enhance the employee experience, promote employee retention, drive change, and leverage the overall success of our organization. In 2023, approximately 82% of employees responded to our engagement survey, with 97% of respondents agreeing that Silk Road Medical is a great place to work.

Commitment to Diversity and Inclusion

We strive to create an inclusive work environment that represents the diversity in the communities in which we live and work. We welcome scientists, salespeople, medical technologists, assemblers, administrators and all others who contribute to our success.

Our employees come from different backgrounds – different races and ethnic backgrounds, different religions, and different parts of the world. Some of us are married to someone of the opposite sex and some to the same sex, some are not married. Some of us are becoming parents for the first time and others are counting down the days to retirement. Some of us do cartwheels every day and some need physical accommodation to best perform their role, but still do cartwheels in their heart.

We welcome all kinds of people who want to be part of our amazing journey.

In 2022, Silk Road Medical formed a Diversity, Equity, and Inclusion (DEI) Council with the mission to foster an environment that is inclusive and welcoming to all. The Council started work with a climate assessment survey and baseline training to bring awareness, engage people on the topic of inclusion and create a common language. The Council's work will continue in 2023 and beyond with a focus on employee education, cultural awareness, and DEI awareness in our HR and marketing programs.

As of December 31, 2022, Silk Road Medical had 414 employees.

Women made up approximately 46% of our workforce, including 42% of our executive leaders and 53% of our total corporate leaders, including our President and Chief Executive Officer, Erica J. Rogers.

People of color made up approximately 42% of our workforce, including 11% of our executive leaders and 34% of our total corporate leaders.

Our workforce spans approximately four generations. Baby Boomers make up about 10% of our workforce, GenX makes up about 46% of our workforce, Millennials make up about 39% of our workforce, and GenZ makes up about 5% of our workforce.

We had very few contingent workers and, as a result, we have not reported separately on contingent workers.

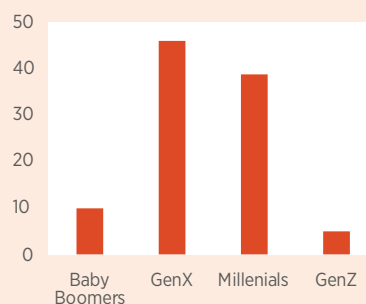
We believe that it is important to have a balanced and diverse board of directors and are committed

SILK ROAD MEDICAL CORPORATE LEADERS

42% of executive leaders
and **53%** of corporate
leaders at Silk Road
Medical are women.

11% of executive leaders
and **34%** of corporate
leaders at Silk Road
Medical are people
of color.

Silk Road Medical Workforce By Generation



to building and maintaining director diversity with members who bring a range of expertise, perspectives, experiences, and personal characteristics pertaining to age, race, gender and ethnicity. As of March 1, 2023, our board of directors, which consisted of eight members, included three female directors and two directors who self-identify as an underrepresented minority.

In addition, we actively recruit candidates from a variety of backgrounds and work to provide a fair interview and selection process. Silk Road Medical supports the educational development of college students through our summer internship program called Summer @ The Road, and by partnering with organizations such as East Side Prep in East Palo Alto, California, and diversity groups at several universities. Interns typically fill roles in our Commercial Operations, Marketing, R&D, and Medical Affairs teams and contribute to the success of our organization while learning valuable skills to aid in their education and early career. In 2022, we had 11 interns with 82% being people of color or women in engineering fields. Two interns accepted full-time jobs and five others will be returning in the summer of 2023.

Commitment to a Workplace Free of Discrimination and Harassment

In addition to our focus on our Cartwheel Culture, we strive to create a workplace that is free of bias, prejudice, discrimination and harassment. Our employment policies are designed to protect all employees and provide for their welfare and guides our behaviors and interactions.

Silk Road Medical does not discriminate on the basis of any protected class, including gender, race, disability, ethnicity, nationality, religion, sexual orientation, and gender identity or gender expression. We are also committed to maintaining a workplace free from harassment based on any protected characteristic.

We require any employee who believes they have been subjected to harassment or discrimination report the facts of the conduct immediately to their supervisor or Human Resources, or both. If, for any reason, employees do not feel comfortable discussing the matter with their supervisor, employees have access to multiple other avenues to make reports, including an Integrity Helpline through which employees may report issues online or by telephone and either choose to identify themselves or remain anonymous.

Creating an environment free of discrimination, harassment and favoritism, where employees feel comfortable, safe, and free from inappropriate and disrespectful conduct strongly reflects our values.

Commitment to Freedom of Association

We are committed to maintaining a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices.

Consistent with the company's demonstrated commitment to providing a safe and empowering workplace environment where contributions are acknowledged and compensated fairly, we recognize our employees' freedom of association. As is typical of companies in our industry and of our size, we do not have any unionized employees.

Commitment to Creating a Safe, Healthy and Secure Work Environment

Safety is extremely important to Silk Road Medical and we are committed to providing a safe, healthy and secure work environment for all employees and visitors. We have developed and implemented occupational health and safety policies that cover all of our facilities and operations. These include policies covering our Injury and Illness Prevention/Workplace Accident and Incident Reduction (AWAIR) Program, our Emergency Action Plan, our Ergonomic Program, our Exposure Control Plan, our Hazard Communication Program, our Hazardous Waste Management Program, and other specialized safety programs. In addition, any employee working in a hospital operating room is required to wear a dosimetry badge that monitors occupational radiation exposure to ensure compliance with annual limits.

We take systemic approaches to integrating safety and emergency preparedness into our day-to-day activities and we allot time for safety training. All employees are required to review and acknowledge our occupational health and safety policies at hire and annually thereafter. Our Employee Safety Committee reviews our safety performance monthly to discuss trends, risks, and opportunities for improvement. We have established an Employee Emergency Response Team comprised of volunteers trained in first aid, CPR, automated external defibrillator (AED) operation and site-specific emergency procedures.

We are proud of our safety record. During 2022, our Total Recordable Injury Rate for all operations was 1.2, which is below the average for the medical device manufacturing industry. We had no workplace fatalities.

Commitment to Competitive and Fair Compensation

Silk Road Medical places a focus on attracting and retaining talented and experienced individuals to manage and support our operations and believes that employees should be compensated fairly for their contributions to the company. We conduct annual compensation benchmarking on all positions throughout the company and we use external benchmarking surveys to guide our assessment of compensation competitiveness. Each position is evaluated based on level of the role, the complexity of the position, and years of experience required. Our compensation

program consists of three primary components: base salary, variable compensation plans (annual bonus targets for non-sales employees and commission plans for sales employees), and equity.

**75% OF ELIGIBLE EMPLOYEES
PARTICIPATE IN SILK ROAD
MEDICAL'S EMPLOYEE STOCK
PURCHASE PLAN**

We also offer all eligible employees the option to participate in our Employee Stock Purchase Plan, or ESPP. We believe our ESPP plan helps to build an ownership mindset amongst our participating employees. Under the ESPP, Participants may elect to have up to 10% of their compensation set aside through payroll deductions to

be used to purchase our common stock. Participants purchase stock in consecutive 6-month offering periods, with the purchase price set at a 15% discount to the lower of the market price at the beginning or end of the offering period. As of December 31, 2022, approximately 75% of eligible employees participated in the ESPP.

The Compensation Committee of our board of directors is responsible for compensation programs for our executive officers and reports to our board of directors on its discussions, decisions and other actions. Further information about our executive compensation programs can be found in our proxy statement.

Commitment to Learning and Development

Silk Road Medical believes that the professional development of our employees is a critical element to the success of our company.

Field Force Training

Silk Road Medical has an extensive training and development program in place for our salesforce. This includes a robust clinical training continuum for our therapy development specialists, area managers and area directors. This continuum commences with a two-week home study and continues well beyond TCAR certification.

Upon completion of the home study, new field hires are required to attend basic therapy and product training, which is typically held at our Plymouth, Minnesota location. This is a five-day intensive clinical/practical application training. All attendees must achieve at least 90% on all exams in order to proceed to the next level of training. The next phase includes eight weeks in the field observing and conducting all aspects of the procedure. Attendees are also required to participate in intermediate training which provides techniques on complication mitigation and includes intensive image training on our platform to support the creation of case plans for healthcare providers.

Within their eight-week field time, they also attend a preceptorship course where they will observe live TCAR cases and attend our TCAR Education and Simulation Training physician training program, also known as TEST Drive. While at TEST Drive attendees observe four hours of didactic and three hours of bioskills lab.

As part of final certification, field team members are required to observe multiple cases and conduct 25 case leads in live TCAR cases. They then travel to the Plymouth facility where they instruct a faculty physician on a simulated case. This entire continuum contains >85 hours of lecture. The continuum also includes monthly clinical training programs to educate on best practices and forensics to keep their knowledge fresh and relevant.

After certification, the field team attends regular continued education courses on clinical topics.

As of December 31, 2022, there were 133 employees with full TCAR certification.

New Hire Training

Every employee goes through an extensive New Hire Training program which informs all employees about the company's Quality System, products, culture, and mission while also covering important policies, procedures and corporate conduct guidelines. Retraining is conducted on the company's policies as they are updated, and refresher training is conducted periodically if no updates are made. Training on all applicable Quality System procedures is required for all company employees at the onset of their responsibilities to ensure the relevance and importance of their activities are understood. Retraining occurs as the respective procedures are updated.

Employee and Leadership Development Training

Silk Road Medical is committed to providing meaningful learning and development programming to employees at all levels, with a special focus on leadership development.

We have thoughtfully sourced respected programming such as Crucial Conversations for Mastering Dialogue and Dare to Lead to provide intrapersonal and personal development as well as Microsoft Office, Six Sigma Black and Green Belt, and classes on project management and critical thinking to support key professional skill sets.

We also develop our own programming and reference tools on a variety of professional skills such as coaching, performance feedback, change management, and DEI-related subjects. In addition, we provide a quarterly educational series for leaders and another for all employees in which subject matter experts share relevant organizational topics. These sessions are intended to be informative yet informal with the goal of greater communication, collaboration, and learning.

Outside of formal classroom learning, we provide opportunities to learn about our business and ask questions directly from our senior-most leaders who make themselves available to meet with small groups of employees on a regular basis.

Development opportunities are scheduled and promoted to reach all employees with in-person classes in both physical sites and virtual class opportunities to serve the field-based employee population.

Commitment to the Health and Wellbeing of our Employees

We prioritize the health and wellbeing of our employees and their families. We offer a comprehensive employee benefits package with a variety of options. These programs include medical, dental, and vision benefits, life insurance, disability programs, retirement programs (including an employer match on 401(k) contributions), flexible spending accounts (FSAs), health savings accounts (HSAs) with a generous employer contribution, an employee assistance program (EAP), and an employee stock purchase plan (ESPP). The company pays approximately 90% of healthcare premium costs on behalf of our employees. For new parents, the company offers up to 160 hours of child bonding leave and provides a benefit for new moms who travel for business that allows for them to pump milk and ship it back home.

All company employees are eligible to participate in our 401(k) program. Employees who work more than 30 hours per week are eligible to participate in our other benefit plans, along with their qualified dependents.

In addition, to support a healthy work/life balance, we offer a generous paid time off policy for all employees in non-exempt positions and a flexible time away policy for employees in exempt positions. We also provide paid holidays to all employees who work more than 30 hours per week.



> Access to Healthcare

Every year, 15 million people worldwide suffer a stroke. Nearly six million die and another five million are left permanently disabled. Silk Road Medical is committed to providing the healthcare system with reliable products which improve the lives of patients and positively contribute to the overall healthcare system.

We have a deep commitment to the well-being of our patients and have many examples of patient success stories available on our website at [Patient Stories](#).

Commitment to Training and Education of Physicians

Silk Road Medical mandates that new TCAR practitioners receive training prior to beginning clinical practice with the TCAR approach. The company has developed and implemented a world-class training program known as TCAR Education and Simulation Training or TEST Drive to train in both a live and virtual format. This program is available for practicing physicians and elements of their staff, as well as for residents and fellows completing their training. The TEST Drive training program provides both didactic and procedural training. The national programs are held in varying formats, including an online didactic, national program, and proctoring.



The didactic lectures are created and delivered by respected physicians with extensive TCAR procedure experience. The company also has developed high fidelity simulators that include a cutdown model to mimic surgical neck dissection with exposure of the common carotid artery and jugular vein. The model has active fluid circulation to provide a realistic simulation of all procedural steps from needle puncture, guidewire placement, arterial sheath insertion, establishment of flow reversal with carotid occlusion, and extracorporeal flow controller connection. The company has recently added a new training component to the simulator that simulates treatment of a carotid lesion and stent deployment without the need for fluoroscopy.

In addition, participants are encouraged to bring case material, including appropriate imaging, for presentation, discussion, and case planning. Finally, training stations are set up to include instructions regarding the use of the ENROUTE® Transcarotid Stent delivery system and deployment of the stent. We believe that a comprehensive and immersive training experience will lead to better clinical outcomes for patients.

Commitment to Patient Safety

At Silk Road Medical we have developed an innovative portfolio of products that deliver significant clinical benefits for our patients. The safety, effectiveness and clinical advantages of TCAR have been demonstrated in multiple clinical trials, post-market studies and registries that have been published in peer-reviewed journals representing outcomes in more than 25,000 patients to date. Key clinical trials and their outcomes are summarized as follows:

Summary of Key Clinical Trials as of February 28, 2023					
	PROOF	ROADSTER	ROADSTER	ROADSTER 3	TCAR Surveillance Project
Study Type	First in Human CE Marking DW-MRI Sub-Study	U.S. Pivotal IDE Study	U.S. Post-Approval Study	U.S. Post-Approval Study	Real world observation
Patients	75 pivotal 56 DW-MRI Sub-Study	67 Lead-in 141 Pivotal 78 Continued Access 52 Stent Sub-study	692	Up to 400	Open Ended
Profile	High Surgical Risk and Standard Surgical Risk	High Surgical Risk	High Surgical Risk	Standard Surgical Risk	High Surgical Risk and Standard Surgical Risk
Status	Complete	Complete	Complete	Enrolling	Ongoing - > 35,000 TCAR cases as of September 1, 2022, per VQI
Carotid Stent Systems Used	CE Marked Carotid Stents, including the Cordis Precise Stent	FDA Approved Carotid Stents, including the Cordis Precise Stent	ENROUTE Transcarotid Stent System	ENROUTE Transcarotid Stent System	ENROUTE Transcarotid Stent System

Summary of TCAR Clinical Trial Outcomes as of February 28, 2023

	PROOF	Pooled ROADSTER		ROADSTER 2	
	Intention to Treat Population	Intention to Treat Population	Per-protocol	Intention to Treat Population	Per-protocol
Stroke at 30 days					
All stroke	1.3%	1.4%	0.5%	1.9%	0.6%
All stroke and death	1.3%	2.3%	1.5%	2.3%	0.8%
Other adverse events at 30 days					
Myocardial infarction	0.0%	1.4%	1.0%	0.9%	0.9%
Cranial Nerve Injury* (Acute)	2.7%	0.5%	NR	1.40%	NR
Cranial Nerve Injury (persisting at 6 months)	2.7%	0.0%	NR	0.9%**	NR
Procedural Information					
Mean procedure time (mins)	NR	73.2	NR	74.8	74.6
Mean length of stay (days)	NR	1.7	NR	NR	1.6

*Only tabulated for Intention to Treat population.

**Evaluated at 90 days.

More information about TCAR trials, studies, and registries is available in our annual report, which is available here: [Silk Road Medical Annual Report](#).

Commitment to Fair Pricing and Access

TCAR is currently approved for commercial use in the United States. The majority of TCAR-eligible patients are Medicare beneficiaries, which means that physicians and hospitals are reimbursed by Medicare for the majority of TCAR procedures and direct patient costs are controlled by the Medicare program. Medicare reimbursement levels to physicians and hospitals have remained relatively stable over the past several years.

We sell TCAR products to healthcare systems, local hospitals, group purchasing organizations (GPOs), and similar customers. We set our pricing to support patient accessibility for the TCAR procedure, accounting for regional reimbursement schedules and procedure volume, among other things. Pricing is negotiated and memorialized in purchasing agreements that may include general confidentiality clauses.

Commitment to Compliance with Federal Policy on use of Animals in R&D efforts

As part of our core responsibilities to develop life-saving products, we incorporate the use of animal models into our research programs to evaluate physical performance characteristics and biocompatibility of devices being developed and to meet regulatory requirements. When suitable bench models are not available, animal studies are carried out at appropriately regulated and certified research institutions. All protocols for animal studies are carefully reviewed by Silk Road Medical and institutions such as IACUC (Institutional Animal Care and Use Committee).

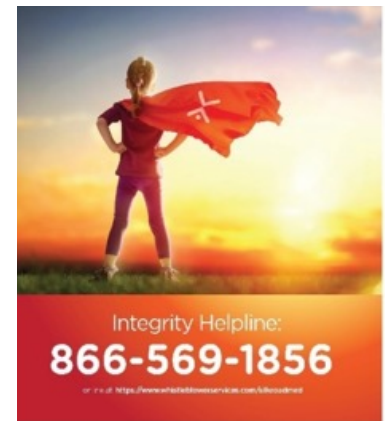
> Ethics and Compliance

At Silk Road Medical, all employees are expected to conduct business with the highest standards of business ethics. All Silk Road Medical employees, directors, agents, and contractors have a responsibility to comply with laws that apply to Silk Road Medical and be honest and ethical in all Company dealings.

Our Code of Business Conduct and Ethics (posted here: [Code of Business Conduct and Ethics](#)) provides our team with the guidance and access to resources needed to operate with unquestionable integrity. Our Code of Conduct does more than just codify rules of conduct – it is the very foundation by which we conduct business every day. The Code of Conduct describes how we put our values into practice and provides guidance for our employees and all others who work on our behalf.

The Code is designed to promote:

- *Honest and ethical conduct.*
- *Compliance with applicable laws, rules, and regulations.*
- *Prompt internal reporting of violations of laws, rules, and regulations.*
- *Accountability for adherence to the Code.*
- *Full, fair, accurate, timely and understandable disclosure in our reports and public communications.*



Silk Road Medical representatives receive annual training on our Code of Conduct and are encouraged to raise compliance related concerns to their manager, functional VP, Human Resources, the Legal department or the Compliance Officer. In addition, reports can be made online or via telephone to an Integrity Helpline reporting system. We allow anonymous reports via the Integrity Helpline and have adopted an open access policy for information reporting, as well as confidentiality and non-retaliation policies for individuals who make reports. Every report is investigated by either the Human Resources Department or Compliance Officer.

Comprehensive Compliance Program

Silk Road Medical has developed a comprehensive compliance program that is designed to comply with applicable federal and state laws and industry standards, including those relating to the marketing and promotion of our products. Among other things, our compliance program provides guidance on interactions between industry and healthcare professionals (HCPs) in the course of sales, marketing, research, contracting, education, training and other activities.

The Silk Road Medical compliance program is designed to assist employees with following both the letter and the spirit of the law, including fraud, waste, and abuse laws, the federal Anti-Kickback Statute (AKS), the federal False Claims Act (FCA), the Foreign Corrupt Practices Act (FCPA), and other applicable laws. Our program was developed using applicable legal standards and government issued guidelines, and was informed by industry standards such

as the Advanced Medical Technology Association (AdvaMed) voluntary code of ethics for Medical Devices & Diagnostics companies (addressing interactions with HCPs and encouraging ethical business practices and responsible industry conduct) and guidelines established by the American Medical Association (AMA) regarding subsidies, payments, and gifts to physicians.

**SILK ROAD MEDICAL TRAINS
ALL OF OUR EMPLOYEES ON
OUR COMPLIANCE PROGRAM
AT HIRE AND ANNUALLY
THEREAFTER**

Our Compliance Program is led by our Compliance Officer and an Ethics & Compliance Committee. Our Ethics & Compliance Committee is led by our Compliance Officer and includes multiple cross functional senior leaders, including leaders from Marketing, Sales, Clinical, Regulatory, Quality, Manufacturing, HR, Legal, and the Executive Medical Director, and meets regularly throughout the year.

We conduct mandatory compliance training for all employees at hire and annually thereafter, including training covering anti-bribery and anti-corruption requirements, the FCA, FCPA and AKS. We have an Integrity Helpline that is monitored by the Compliance Officer and the Chief Legal Officer. Employees are trained on the helpline at new hire training as well as provided regular reminders during annual compliance training.

> **Dedication to Quality and Patient Safety**

Silk Road Medical has the highest commitment to quality, following our North Star to achieve great patient outcomes and ensure patient safety. The Silk Road Medical Quality System, as defined in the Quality Manual, is the foundation to ensure that quality is built into every step of the medical devices that Silk Road Medical designs and develops, manufactures, and supplies to customers.

The quality system is designed to ensure compliance with U.S. Food and Drug Administration (FDA) and applicable international regulations governing the design and development, manufacture, release, distribution and traceability of Silk Road Medical's medical devices.

Silk Road Medical maintains a current ISO 13485 certificate, the scope of which is:

The design and manufacture of sterile Transcarotid Neurointerventional Access Systems – with Retrograde Flow Neuroprotection and Transcarotid Stent Systems.

SILK ROAD MEDICAL QUALITY POLICY

Silk Road Medical is dedicated to developing, manufacturing, and marketing minimally invasive medical devices for the treatment of patients with vascular diseases.

Silk Road Medical is committed to maintaining and improving the suitability and effectiveness of its products and its quality management systems in order to comply with regulatory and user requirements.

Silk Road Medical's adherence to regulations and standards occurs through periodic FDA inspections and annual surveillance audits conducted by Silk Road Medical's registrar. The most recent FDA inspection was conducted in February 2020, resulting in a single Form 483 Notice of Observation that was satisfactorily closed with FDA in June 2020. The most recent registrar Annual Surveillance Audit, conducted in September 2022, resulted in no observations or non-conformances.

Post-Market Activities

Silk Road Medical has a robust post-market surveillance and complaint handling system. The system provides for timely communication between our field employees and customers and the internal Quality Assurance team. Information regarding Silk Road Medical products and user and patient experiences is reviewed and, where appropriate, regulatory authorities are notified. Adverse events and device malfunctions are reported in the United States to FDA and listed in the Manufacturer and User Facility Device Experience (MAUDE) database (<https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfMAUDE/search.CFM>).

The information received is trended and analyzed as an input for continuous improvements of the products to ensure Silk Road Medical meets the needs of customers and their patients.

To date, there have been no Silk Road Medical products listed on the FDA MedWatch Safety Alerts for Human Medical Products Database. There has been one recall associated with Silk Road Medical's products. The recall was initiated in January 2021 on specific lots of the ENROUTE Transcatheter Stent System due to a tip bonding issue that could result in tip detachment during use. There were no serious health issues or deaths reported in association with the recall. In total, 100 stent lots were recalled. The recall was completed internally at Silk Road Medical and recall closure was requested with the FDA in September 2021. The recall was formally closed with the FDA as of January 31, 2023.

> Commitment to Strong Supplier Partnerships

Silk Road Medical's commitment to our customers and patients not only extends to our products, but also to our many component, material, and finished device supplier partners.

Silk Road Medical partners with key suppliers to ensure we can provide the highest quality products to our customers and their patients. We work closely with our suppliers throughout all stages of product design, development, production, and distribution to ensure our processes and products meet the needs and expectations of our customers.

Supplier relationships are reviewed regularly so that all parties remain focused on a single goal, which is to provide the highest quality devices to our patients. Product requirements are communicated, and detailed specifications are well understood, so that all parties remain aligned to provide the best quality of components, materials, and finished devices.

Silk Road Medical works with a wide range of suppliers of components, materials, supplies, and finished products throughout our product portfolio. Suppliers go through several quality

assessments and audits, including onsite visits and inspections as necessary, before they are approved to supply parts to us. This monitoring allows us to assess conformance to regulatory standards and allows us to frequently re-establish goals and expectations as the business grows. All suppliers are routinely monitored for product quality conformance and are provided real-time feedback when agreed upon criteria are not met. This approach ensures open, direct, and productive communication with the company's suppliers.

Our Supply Chain, Quality, R&D and Manufacturing teams execute a coordinated process to identify, evaluate and choose suppliers which meet Silk Road Medical's requirements. Silk Road Medical requirements for our suppliers go beyond the functional capability of the supplier with additional assessment of a supplier's risk management processes, production capacity, product specification conformance, site inspection, quality assurance/quality control testing, regulatory compliance, and continuous improvement processes.



**SILK ROAD MEDICAL PARTNERS
WITH SUPPLIERS TO ENSURE
WE CAN PROVIDE HIGH
QUALITY PRODUCTS THAT ARE
SOURCED RESPONSIBLY.**

When the company has identified the need for a new component or material, Silk Road Medical strives to utilize our existing supply base whenever possible. This ensures not only our commitment to our suppliers, with growth and new opportunities, but also reduces our exposure to new and untested suppliers. Having a robust existing supplier oversight program fosters trusting relationships with our suppliers and reduces a variety of risks for the company and our customers.

All of our suppliers are assigned a classification level based on their potential to impact patient health and safety and approved through our Quality System. This is true for components, services, or finished devices. All suppliers are monitored on a periodic basis, commensurate to their classification level and their overall product quality and conformance.

All components, materials, and finished devices have complete traceability throughout the manufacturing process, from purchase order receipt through final distribution to our customers. Incoming product is evaluated based on risk profiles and historical inspection results. These inspections are tracked and trended and the information fed back to our vendors and suppliers for continuous improvement.

For suppliers that fail to deliver product consistent with Silk Road Medical's standards, we have a rigorous process of Supplier Corrective Action that identifies root causes, remedial and preventative actions, and long-term effectiveness verifications. This ongoing supplier performance evaluation ensures we are continually improving the quality and conformance of all Silk Road Medical's components, materials, services and finished devices.

> Conflict Minerals Policy Statement

Silk Road Medical is fully dedicated to conducting our business with respect for human rights and in compliance with applicable laws. We support responsible material sourcing and encourages our suppliers to eliminate sourcing certain minerals, including columbite-tantalite (tantalum), cassiterite (tin), wolframite (tungsten), gold, and any of their derivatives, from sources that may finance armed conflict and cause human rights abuses.

For this reason, Silk Road Medical has established a program that is in alignment with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (“OECD Guidelines”) and its applicable supplements.

Enhancing the visibility of Silk Road Medical’s supply chains requires a collaborative effort with suppliers. To this end, we expect our suppliers to adopt similar policies and management systems with respect to conflict minerals and to drive those efforts through their supply chains.

Our suppliers are expected to promptly provide clear, timely, accurate, and appropriate reporting when requested regarding the smelters and facilities within their minerals supply chain as well as steps taken to investigate the source and chain-of-custody of such minerals. Silk Road Medical will continue to use this policy and the OECD Guidelines to evaluate relationships with current and future suppliers to ensure that they share our values regarding compliance, transparency, human rights, and ethics.

> Commitment to the Environment

As a growing medical technology company, we recognize that environmental responsibility plays an important part in the manufacturing of our products. Our environmental health and safety activities are led by the Vice President, Operations and Vice President, Human Resources.

Environmental Impact – All Silk Road Medical Operations

Our Sunnyvale, California footprint is 32,600 square feet and includes an ISO standard registered clean room that is 2,500 square feet. Our Plymouth, Minnesota facility footprint is 82,000 square feet and includes an ISO standard registered clean room that is 6,600 square feet. While we use city water and natural gas for routine facility operations such as heating, drinking water, and restrooms, our

SILK ROAD MEDICAL USE OF ELECTRICITY AND NATURAL GAS

Electricity Use – 2022 Per Day Average (kWh/day)

Sunnyvale, CA – 1,572

Plymouth, MN – 2,633

Natural Gas Use – 2022 Per Day Average (therms/day)

Sunnyvale, CA – 35

Plymouth, MN – 110

manufacturing processes at both Sunnyvale and Plymouth do not use city water or natural gas. We have no equipment that requires permitting.

At both locations, we use LED light sources and both occupancy and daylight sensors to minimize energy use for lighting. On weekends, air handlers are turned down and television screens are turned off to conserve energy.

Business, Production, Packaging, and Chemical Waste, Recycling and Reuse – All Silk Road Medical Operations

Our Sunnyvale location participates in the recycling programs offered by the City of Sunnyvale. All facility garbage and recycling, including recycling programs for business waste, production waste, and packaging waste, are managed through the city programs. Silk Road Medical generates approximately 15 tons of solid waste per year at this facility, 71% of which is recycled.

Our Plymouth facility uses similar waste management practices for its business, production, and packaging waste. While we do not have sufficient data to report a per-year rate of solid waste generation because the facility was only recently opened, we are currently producing solid waste at a lower rate at the Plymouth facility than at Sunnyvale and have a similar recycling rate (greater than 70%).

Both locations actively encourage employees to use reusable water bottles and mugs while in the office and provide branded bottles and mugs for all new employees. Cups and utensils provided in the office are all made of recycled materials.



In addition, our company practice is to reuse and redeploy returns and expired product. All administrative returns, excess, expired, and obsolete products are repurposed for other uses. For example, functional but otherwise non-saleable units are used in our physician and employee hands-on training programs conducted throughout the year. In addition, returned and non-saleable units are used within our engineering department for evaluation, testing, and prototyping activities where applicable. By re-using and re-purposing products where possible we ensure those products have multiple uses prior to disposal.

Our company is a small-quantity generator of hazardous waste in California and in Minnesota. Our hazardous waste program ensures that we comply with all relevant local, state, and federal regulations for proper signage, storage, inspections, labeling, transporting and disposal of waste. We are evaluating additional measures to reduce hazardous waste through improved solvent inventory, purchasing and recycling practices.

Electronic Waste

We manage the collection and recycling of electronic waste. When possible, computers that are taken out of rotation for employee use and are no longer considered a fixed asset are refurbished by our Information Technology team and offered to employees for personal use. Electronic materials that cannot be reused internally are sanitized and recycled by licensed e-waste recycling vendors. In addition, we collect and appropriately dispose of dead batteries. We generate less than 200 pounds of mixed electronic waste (batteries, monitors, computers, keyboards, etc.) per year.

We sponsor annual electronic recycling events at our facilities at which employees may bring their household electronic waste (such as computers and computer equipment, TVs, cell phones, and batteries) for recycling free of charge.

> Silk Road Medical SASB Index

We provide the table below as a reference to topics described in the Sustainability Accounting Standards Board (SASB) standards for the Medical Equipment and Supplies industry. This report is informed by these SASB standards but is not intended to align with them and is a voluntary disclosure to support the evolving information needs of our investors. As such, we are committed to providing investors with useful, relevant, and meaningful sustainability information. The determination of the topics covered below is based on two factors: (i) sector-specific guidance provided by SASB and (ii) periodic assessments of sustainability issues that matter most to our stakeholders and our business. We will continue to evaluate these topics in the future and, accordingly, our disclosure may evolve over time.

SASB Metric	Sustainability Accounting Standards Board (SASB) Framework	Response/Location of relevant information
HCMS-240a.1, 240a.2	Affordability and Pricing	Commitment to Fair Pricing and Access
HCMS-250a.1, 250a.2, 250a.3, 250a.4	Product Safety	Dedication to Quality and Patient Safety
HCMS-270a.1, 270a.2	Ethical and Marketing	Business Ethics and Integrity <i>Silk Road Medical has had no monetary losses as a result of legal proceedings associated with false marketing claims.</i>
HCMS – 401a.1, 410a.2	Product Design & Lifecycle Management	Commitment to the Environment
HCMS – 401a.1, 410a.2	Product Design & Lifecycle Management	Commitment to the Environment
HCMS – 430a.1, 430a.2, 430a.3	Supply Chain Management	Commitment to Strong Supplier Relationships
HCMS – 510a.1, 510a.2	Business Ethics	Commitment to Training and Education of Physicians <i>Silk Road Medical has had no monetary losses as a result of legal proceedings associated with bribery or corruption.</i>