



# SILK ROAD MEDICAL

## 2020 CORPORATE RESPONSIBILITY REPORT



In early 2020, Silk Road Medical celebrated our 14th year as a business and our first year as a public company.

From the very first days of Silk Road 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.

I am very pleased to provide our first report on the actions we are taking in the areas of environment, social and governance that support our goals of being a socially responsible organization.

Sincerely,

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

Erica Rogers  
President & CEO

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# 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. We have pioneered a new approach for the treatment of carotid artery disease called transcarotid 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 profile of current treatment alternatives while providing a reduction in long-term stroke risk.

<b>Silk Road Medical By the Numbers</b>	<b>224 Employees</b>	<b>\$63.4 Revenue</b>	<b>640 Hospital Accounts</b>
	<b>Over 8,400 Procedures</b>	<b>83% Revenue Growth</b>	<b>1,444 Physicians Trained</b>

The year 2020 has brought unprecedented uncertainty with the coronavirus impacting lives and businesses around the world. At the time of preparing this document, we are faced with the challenge of a highly variable health care climate as hospitals emerge from an intense focus on the treatment of COVID-19.

Our teams in the field have done a wonderful job of staying focused on our North Star, doing what they can to ensure the best possible patient outcomes and physician support for TCAR procedures performed in the current climate, while supporting and monitoring the pipeline of patients being rescheduled, all the while continuing to prioritize the overall safety of our employees and the providers they serve.

While this has changed our short-term focus, we have not lost sight to our three strategic priorities for 2020.

1



## **U.S. TCAR Commercial Execution**

- Broaden adoption and deepen penetration while maintaining outcomes

2



## **TCAR Label Expansion**

- Establish regulatory and reimbursement strategy for Standard Surgical Risk

3



## **Pipeline Development**

- Outline pipeline products and clinical strategies

## 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.

Consistent with this commitment, Silk Road Medical strives to create a work environment in which everyone is empowered to develop, to contribute, and to thrive.

At Silk Road Medical, 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.

Our Cartwheel Culture 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.

## Commitment to Diversity and Inclusion

As of September 1, 2020, TCAR Nation is 259 members strong. We are proud of the gender diversity in our organization with female's representing 46% of our organization. This ratio is consistent across leadership roles within the company, where women represent 50% of our executive leaders and 44% of our total corporate leaders.

We strive to create an inclusive work environment that represents the diversity in the communities 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.

### **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. In short, as a company, we do not tolerate discrimination or harassment.

Silk Road Medical does not discriminate on the basis of color, religion (including, but not necessarily limited to religious creed, dress, and grooming practices), citizenship, political activity or affiliation, marital status, age (40 and older), national origin (including, but not necessarily limited to language use and possession of a driver's license issued to undocumented persons unable to obtain a driver's license under federal law), ancestry, mental or physical disability (including, but not necessarily limited to HIV and AIDS disabilities), genetic information, medical condition (including, but not necessarily limited to cancer), military and veteran status, sexual orientation, gender identity, gender expression, sex, gender, pregnancy, taking or requesting statutorily protected leave, or any other characteristics protected under applicable federal, state, or local laws.

We are also committed to maintaining a workplace free from harassment based on any protected characteristic. Harassment may take many forms, but the most common forms include: verbal harassment (e.g., jokes and/or unwelcome remarks about an individual's body, color, physical characteristics, appearance, or sexual practices, or gossiping about sexual relations); sexual harassment (e.g. conduct of a sexual nature between members of the opposite or same sex that is not welcome to the recipient); physical harassment (e.g., impeding or blocking movement, unwelcome physical contact, or leering at a person's body); or visual harassment (e.g., offensive or obscene pictures or emails, gestures, display of sexually suggestive or lewd objects, because of a protected characteristic, that is placed or circulated in the workplace).

We ask that 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 should bring the matter to the attention of the Vice President HR, their second-tier supervisor, or the CEO. If the employee doesn't believe his / her concern is being adequately addressed or if he / she is not comfortable speaking with one of the above-noted contacts, we offer employees an Integrity Helpline either online at <https://www.whistleblowerservices.com/silkroadmed> or by telephone at 866-569-1856, through which the employee may report the issue and either choose to identify himself / herself 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. In turn, we expect cooperation from all employees in making the non-discrimination and anti-harassment policies effective by both reporting any inappropriate behavior and participating as requested in any formal investigation. Policy violations will result in appropriate disciplinary action, which may include termination of employment.

### **Commitment to Equal Employment Opportunity**

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 in all aspects of employment and personnel matters (including, without limitation, recruiting and hiring, job assignment, compensation, opportunities for advancement, evaluation, benefits, training, discipline, and termination), and prohibits discriminatory practices.

All employees are employed on an at-will basis, consistent with local jurisdiction employment laws and regulations.

As of September 1, 2020, we had 259 employees, with the majority of employees located at our Sunnyvale, CA corporate headquarters. As is typical of companies in our industry and, of our size, we do not have any unionized employees (or all of our employees are employed pursuant to individual employment agreements). 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 employee's freedom of association.



### **Commitment to Creating a Safe, Healthy and Secure Work Environment**

Silk Road Medical is committed to providing a safe, healthy and secure work environment for all employees and visitors. Safety is extremely important to the company and we comply with all applicable health, safety and environmental laws as well as our Safety Programs. These Safety Programs and associated procedures have been developed and implemented throughout the company's facility with employees' safety in mind. These programs include an Injury and Illness Prevention Program, an Emergency Action Plan, an Exposure Control Plan, a Hazard Communication Program and a Hazardous Waste Management Program. In addition, any employee working in a hospital operating room is required to wear a dosimetry badge that monitors occupational radiation exposure and compliance with annual limits. No workplace injuries were reported in 2018 and 2019 as well as through the first half of 2020.

### **Commitment to Fair and Focused Recruitment Efforts**

Consistent with the company's mission and the complexity of our business, we seek to recruit and hire a highly technical workforce. We seek candidates with diverse backgrounds and ensure a fair interview and assessment process. Silk Road Medical has a very high employee referral rate for its open positions at 78%.

Silk Road Medical supports the educational development of college students through our summer internship program called *Summer at The Road*. Interns typically fill roles in our Commercial Operations, Marketing, R&D, and Medical Affairs teams and contribute to the success of our organization as well as learning valuable skills to aid in their education and early career. Similar to our regular workforce, we aim to have an internship class that is highly diverse. We have created partnerships with both high school and university diversity programs to provide qualified, diverse candidates to be considered for our program.

### **Low Employee Turnover**

In 2019, Silk Road Medical had a voluntary turnover rate of 3.8%, well below industry averages.

### **Commitment to Competitive and Fair Compensation**

Silk Road Medical believes that employees should be compensated fairly for their contributions to the company. The company practices paying competitive salaries and hourly wages. In order to ensure Silk Road Medical pays its employees competitively, annual benchmarking is completed on all positions throughout the company. We use external benchmarking surveys to guide our assessment of salary 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 the three primary

components: base salary, annual bonus targets (non-sales), commission plans (sales), and equity. In all cases, Silk Road Medical complies with all Federal and State requirements related to compensation of employees.

In addition, all employees are eligible to participate in our Employee Stock Purchase Program and we have a participation rate of approximately 85%.

The Compensation Committee is responsible for our executive 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 at the following link: [2020 Proxy Filing](#).

### **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 our physician training program, named TEST Drive, which is an acronym for TCAR Education and Simulation Training and observe 4 hours of didactic and 3 hours of bioskills lab. The next component of training is basic therapy and product training, which is typically held at the corporate headquarters in Sunnyvale, CA. This is a 5-day intensive clinical/practical application training. All attendees must achieve at least 85% on all exams in order to proceed to the next level of training. The next phase includes 90 days in the field observing and conducting all aspects of the procedure. They are also required to attend intensive image training on our platform as they will be creating case plans for healthcare providers. Restrictions on travel and in person meetings due to COVID-19 have required us to rethink our training approach and temporarily manage this training remotely and in small group sessions complying with all required protocol and maintaining quality and effectiveness.

Within the 90 days, they will also attend a preceptorship course where they will observe live TCAR cases.

Next is intermediate training which provides advanced clinical didactic and education on resources. As part of final certification, they are required to observe 5 cases and conduct 25 case leads in live TCAR cases for a total of 30. They then travel to TEST Drive where they will instruct a TEST Drive physician faculty 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 September 2020, there are 102 employees who are fully TCAR certified.

### **Manufacturing Team Training**

The company actively supports the professional education of our production team to ensure the manufacture of a quality product. This training includes training on manufacturing techniques, quality control procedures, and English language classes.

### **Employee and Leadership Development Training**

Silk Road Medical offers employees training programs in topics such as Lean / Six Sigma and Performance Coaching. Silk Road Medical is continuously evaluating and updating our training opportunities for employees and we are working on implementing additional management and staff training within the company.

### **Other Training Opportunities**

Every employee goes through an extensive New Hire Training program which informs all employees about the company's products, policies, procedures and corporate conduct guidelines. 100% of our employees goes through Safety Training and Anti-Harassment training upon hiring.

Additional employee training programs include: Quality System Manual, Quality System Terminology, Personnel and Training Corrective and Preventive Actions, Product Complaints, Control of Records, Information Systems and Security Policy.

Each year the company budgets a certain amount for employee learning and development. In 2019, the company incurred expenses of about \$80,000 for the continuing education of our employees. This money can be used by employees to attend medical conferences or attend externally hosted educational programs.

## **Commitment to the Health and Wellbeing of our Employees**

At Silk Road Medical, one of our top priorities is to maintain the health and wellbeing of our employees and their families. To achieve this goal, we offer a comprehensive employee benefits package with a variety of options. These programs include Medical, Dental, Vision, Life Insurance, Disability Programs, Retirement Programs including a match on the 401(k), Flexible Spending Accounts (FSAs), Health Savings Accounts (HSAs) with a generous employer contribution, EAP, and an ESPP. The company pays 83% of healthcare premium costs on behalf of our employees. For new parents, the company offers up to 160 hours of child bonding leave and provided a benefit for new moms who travel for business that allows for them to pump milk and ship it back home. All company employees who work more than 30 hours per week and their qualified dependents are eligible to participate. In addition, the company provides paid vacation and holiday time.

## **Commitment to Corporate Philanthropy**

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. Over the years, the company has been involved in a variety of projects including holiday gift drives, school backpack drives, the hand making and donation of 70 blankets to a local rehabilitation and healthcare center near our headquarters. The company also provides financial support by sponsoring the Stroke Awareness Foundation's Fight Stroke Walk and had approximately 35% of employees and their family members participate in the walk. Thus far in 2020, the company has participated in building bikes for under privileged children at our National Sales meeting, and during the Covid-19 pandemic, the company made a financial and in-kind donation to the Valley Medical Foundation and a financial donation to Meals on Wheels. The company also used its logistics team to distribute PPE Equipment including face masks, frocks, gloves, shoe covers, beard covers and hair nets that was donated by a third party to hospitals around the U.S. Most recently, 80 employees participated in the Cycle Nation fundraising event with the American Heart Association raising almost \$15,000.

## **Access to Healthcare**

Every year, 15 million people worldwide suffer a stroke. Nearly six million die and another five million are left permanently disabled. Globally, stroke is the second leading cause of disability. 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.

Our TCAR procedure volume is growing each year as physicians and their patients are more frequently choosing TCAR over other solutions, having surpassed 20,000 TCAR procedures performed worldwide in the 2<sup>nd</sup> quarter of 2020. In 2019, TCAR was used to treat over 8,400 patients with carotid artery disease in the U.S., compared to over 4,500 in 2018 and over 1,800 in 2017.

Silk Road Medical sells its products through a direct field force comprised of Area Managers and Therapy Development Specialists. Our sales team members go through an extensive training program as documented in the Commitment to Learning and Development section. Our products are manufactured at our facility in Sunnyvale, California and through third party manufacturing partners and shipped directly to customers.

### **Commitment to Training and Education of Surgeons**

Silk Road Medical considers it crucial for new TCAR practitioners to receive adequate training prior to beginning clinical practice with the TCAR approach. The company has developed and implemented a world-class TEST DRIVE training program to address this training need. This program is available for practicing surgeons, elements of their staff, as well as for surgical residents and fellows completing their vascular surgery training. The TEST DRIVE training program provides both didactic and “wet model” training. The national programs are held at a bio-skills facility near the Chicago O’Hare airport and regional programs are held at select bio-skills facilities throughout the U.S.

The program includes didactic lectures from respected surgeons who have had extensive experience with the TCAR procedure. The company also has developed wet models that include a cutdown to expose a realistic 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, flow reversal with carotid clamping, and extracorporeal side arm connection to the femoral vein. Guidewire access to the lesion under fluoroscopic control and stent deployment completes the hands-on part of the program.

Beginning in 2018, leveraging the curriculum of the standard TEST DRIVE program, specific modules were developed to meet trainees’ needs as they first enter practice. These modules included expanded information and tips on how to navigate value analysis committees, supply chain management, reimbursement issues as well as how to utilize new technologies and industry partnerships to enhance physician practice development. We help our surgeon customers with many aspects of practice management.

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. Angioscopy is included in the training, giving trainees the opportunity to visualize insertion of the micro puncture needle, guidewire passage, and insertion of the Uber-Flex™ arterial sheath. 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. Quite literally, we are helping patients reduce, or eliminate, the risk of stroke and other significant medical conditions related to blocked carotid arteries. The TCAR procedure is a less invasive procedure compared with the alternative, Carotid Endarterectomy (CEA). As of November 11, 2020, there are 49 peer reviewed and published papers and 7 clinical studies related to the TCAR procedure, with some of them showing TCAR to have a superior efficacy and safety profile compared with CEA.

All clinical trials are conducted with an approved protocol and are subject to institutional review board/ethics committee approval prior to trial initiation.

Data monitoring is conducted in-house with our clinical affairs team. For pre-market trials, we contract with an independent data and safety monitoring board. In addition, we contract with an independent clinical events committee to adjudicate major adverse events.

Institutional Review Board/Ethics Committee (IRB/EC) approval includes the patient informed consent form which articulates the risks to patients. Throughout the duration of clinical trials, participating sites are monitored for timely and accurate data capture and appropriate informed consent procedures. Monitoring is conducted according to a prospectively approved monitoring plan. In pivotal and feasibility studies, an unaffiliated data safety monitoring board (DSMB) is assembled to routinely review outcomes. The DSMB has independent authority to recommend pausing or terminating a trial or recommend changes to the trial protocol.

Silk Road Medical was subject to an FDA Bioresearch Monitoring inspection for the pivotal ROADSTER trial. That inspection led to one item noted on Form 483 Official Action Indicated (OAI) related to the patient data line listings that were submitted to FDA. There was a transcription error for certain patients. The patient line listings were

corrected during the inspection. The Office of Device Evaluation was notified of the issue and updated line listings were provided.

Clinical Trial Title	ClinicalTrials.gov reference
Silk Road Medical First in Man Study - Neuroprotection During Carotid Stenting and Angioplasty (PROOF)	<a href="https://ClinicalTrials.gov/show/NCT01264419">https://ClinicalTrials.gov/show/NCT01264419</a>
POST-APPROVAL STUDY of TRANSCAROTID ARTERY REVASCULARIZATION in PATIENTS With SIGNIFICANT CAROTID ARTERY DISEASE (ROADSTER 2)	<a href="https://ClinicalTrials.gov/show/NCT02536378">https://ClinicalTrials.gov/show/NCT02536378</a>
The MICHI NEUROPROTECTION SYSTEM: Evaluation of Performance in Carotid Artery Stent Procedures (The LOTUS Study)	<a href="https://ClinicalTrials.gov/show/NCT01958294">https://ClinicalTrials.gov/show/NCT01958294</a>
MICHI Neuroprotection System (NPS+f) Filter Debris Analysis Study (The F-1 Study)	<a href="https://ClinicalTrials.gov/show/NCT01877174">https://ClinicalTrials.gov/show/NCT01877174</a>
Safety and Efficacy Study for Reverse Flow Used During Carotid Artery Stenting Procedure (ROADSTER)	<a href="https://ClinicalTrials.gov/show/NCT01685567">https://ClinicalTrials.gov/show/NCT01685567</a>

Additional clinical trial information can be found at <https://www.clinicaltrials.gov/>

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 <https://silkroadmed.com/patient-stories/>

The TCAR Surveillance Project (TSP) is an initiative of the Society for Vascular Surgery Patient Safety Organization (SVS PSO). The TSP is a surveillance registry designed to monitor the safety and effectiveness of transcatheter stents placed directly into the carotid artery while reversing blood flow within the carotid artery to reduce stroke risk (TCAR). It will compare this less-invasive surgical procedure with standard carotid endarterectomy in centers that participate in the Vascular Quality Initiative (VQI). Additional information on the TSP can be found at: <https://www.vqi.org/data-analysis/tcar-surveillance-project/>

## OBJECTIVES OF THE TSP

- Obtain more data about real-world outcomes of TCAR in comparison with CEA as performed by centers participating in the VQI.
- Serve as a repository for TCAR procedures and outcomes data to broaden the evidence base for TCAR.
- Benchmark outcomes against other participants.

### 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.

Physicians are reimbursed by traditional Medicare through the Medicare Physician Fee Schedule. The Medicare physician Current Procedure Terminology (CPT) code (37215) is used for both TCAR and transfemoral carotid artery stenting procedures. Since 2017, the Medicare physician fees are stable for overall National Average payments and with no change in work Relative Value Units (RVUs).

CPT – 37215	2017	2018	2019	2020
Work RVU	17.75	17.75	17.75	17.75
Total RVU	29.09	29.18	29.21	29.04
Conversion Factor	\$ 35.8887	\$ 35.9996	\$ 36.0391	36.0896
National Avg Payment	\$ 1,044.00	\$ 1,050.47	\$ 1,052.70	\$ 1,048.04

Source: <https://www.cms.gov/apps/physician-fee-schedule/search/search-criteria.aspx>

Hospitals are reimbursed by traditional Medicare for TCAR only as hospital inpatient procedures as published in the Medicare Hospital Inpatient Prospective Payment System (HIPPS). TCAR and transfemoral carotid artery procedures are paid under the same MS-DRG family – Carotid Artery Stenting (CAS) 034, 035 and 036. The FY2017-FY2021 MS-DRG weights and national standardized payments for the CAS MS-DRG family remain stable.



<b>Carotid Artery Stenting – MS-DRGs</b>	FY2017 HIPPS Final Rule	FY2018 HIPPS Final Rule	FY2019 HIPPS Final Rule	FY2020 HIPPS Final Rule	FY2021 HIPPS Final Rule
<b>MS-DRG 034 – CAS w/ Major Complication &amp; Comorbidities (MCC)</b>	MS-DRG Weight: 3.8503 Standardized Avg Payment: \$ 22,959	MS-DRG Weight: 3.9918 Standardized Avg Payment: \$ 24,057	MS-DRG Weight: 3.5998 Standardized Avg Payment: \$ 21,979	MS-DRG Weight: 3.7537 Standardized Avg Payment: \$ 22,494	MS-DRG Weight: 3.9746 Standardized Avg Payment: \$ 25,546
<b>035 – CAS w/ Complications &amp; Comorbidities (CC)</b>	Relative Weight: 2.3365 National Unadjusted Avg Payment: \$ 13,932	Relative Weight: 2.2278 National Unadjusted Avg Payment: \$ 13,932	Relative Weight: 2.2203 National Unadjusted Avg Payment: \$ 13,556	Relative Weight: 2.3022 National Unadjusted Avg Payment: \$ 14,409	Relative Weight: 2.3371 National Unadjusted Avg Payment: \$ 15,022
<b>036 – CAS w/o CC/MCC</b>	Relative Weight: 1.7487 National Unadjusted Avg Payment: \$ 10,427	Relative Weight: 1.7636 National Unadjusted Avg Payment: \$ 10,628	Relative Weight: 1.726 National Unadjusted Avg Payment: \$ 10,538	Relative Weight: 1.751 National Unadjusted Avg Payment: \$ 10,959	Relative Weight: 1.8512 National Unadjusted Avg Payment: \$ 11,898

Source: FY2017-2021 HIPPS Final Rule; Table 1B, 1D, 5

Affordability and access to TCAR is supported through appropriate pricing of TCAR products to ensure the procedure is financially viable for healthcare institutions.

We do not use pricing tiers to incentivize artificial purchasing behavior by our customers.

### **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 and training 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).

For current/anticipated projects, use of animals (or cadaver tissue specimens) would be for the purposes of R&D testing, not training/education. There are currently no plans to utilize animals for anticipated training or education activities.

## Business Ethics and Integrity

At Silk Road Medical, honest and ethical conduct is critical to our success as a business. 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.

We have developed a Code of Conduct to provide employees, directors, agents, and contractors with the guidance and access to resources needed to operate with unquestionable integrity. The Code is designed to deter wrongdoing and 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.

We recognize that we operate in a highly regulated industry. Operating in the medical technology industry requires our employees to abide by an extensive set of rules, regulations, standard operating procedures, policies and practices. It is company policy that our employees adhere to and, abide by, all requisite rules and regulations in their decision making. But every day, we know our employees, directors, agents, and contractors are faced with challenges and dilemmas that require them to make choices. Not every situation which may arise can be anticipated so we operate by the phrase “Use Good



Judgement Always” and have created a symbol to remind all of us of this standard.

In further support of this standard, Silk Road Medical is committed to fostering constructive dialogue between management and employees. Our goal is that all employees, directors, agents, and contractors seek answers to questions when ethical

or compliance related issues arise, and they know who to turn to for a meaningful response. Additionally, employees are empowered to ask questions, to report actual and potential violations of this Code without fear of retaliation.

Silk Road Medical representatives are encouraged to raise compliance related concerns to their manager, functional VP, Human Resources or the Compliance Officer. We have adopted an open access policy for information reporting, as well as confidentiality and non-retaliation policies for reporting individuals. In order to facilitate our policies and maintain unrestricted access to reporting compliance concerns, anonymous reports are accepted via a Compliance Hotline reporting system and every report is investigated either the Human Resources Department or Compliance Officer. The Compliance Hotline can be reached at +1-866-569-1856 or online at <https://www.whistleblowerservices.com/silkroadmed>.

### **Comprehensive Compliance Program**

The company has developed a Comprehensive Compliance Program that is designed to comply with applicable federal and state laws and industry standards relating to the marketing and promotion of our products. More specifically, 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.

To our knowledge as of the date of this declaration, Silk Road Medical is in compliance with California Health & Safety Code sections 119400-119402, [as described here](#).

The Silk Road Medical Compliance program is designed to assist employees with following both the letter and the spirit of the Fraud and Abuse Laws, including the Federal Anti-Kickback Statute (AKS). The Silk Road Medical compliance program was developed using applicable legal standards, government issued guidelines, and industry standards.

Silk Road Medical has chosen to implement a comprehensive compliance program for the following reasons:

- As a good corporate citizen, Silk Road Medical wants to do its part to reduce waste, fraud, and abuse in the healthcare industry.
- We believe that compliance with federal and state laws, as well as industry guidelines, translated into better, more cost-effective patient care.
- We are committed to keeping our staff educated on healthcare ethics and policies.
- We are a trusted advisor to our customers and our customers trust us to know the law and to look out for their best interest.

Our Compliance Program is led by our Compliance Officer and an Ethics & Compliance Committee that address the risks and policies in regard to ethical behavior as well as industry interactions with healthcare providers. Our Ethics & Compliance Committee is led by our Compliance Officer and includes our CEO, Chief Commercial Officer, EVP Regulatory / Clinical / Quality, VP, HR, Executive Medical Director and meets regularly throughout the year.

Silk Road Medical is committed to complying with all government regulations and industry guidelines, including but not limited to:

- Anti-Kickback Statute: Federal statute prohibiting individuals or entities from knowingly and willfully offering, paying, soliciting or receiving value (monetary or non-monetary) to induce referrals of items or services covered by Medicare, Medicaid or any other federally funded program.

Violations can lead to fines, imprisonment or exclusion from selling products to federal and state health programs (e.g., loss of Medicare and/or Medicaid benefits).

- False Claims Act (FCA): Federal and state law prohibiting the submission of “false” or “fraudulent” claims for payment to government programs, commercial insurers, and other health care plans. Violations can lead to fines, imprisonment or exclusion from selling products to federal and state health programs (e.g., loss of Medicare and/or Medicaid benefits).
- Advanced Medical Technology Association (AdvaMed): Voluntary code of ethics for Medical Devices & Diagnostics (MD&D) companies that (1) addresses interactions with healthcare professionals (HCPs) and (2) encourages ethical business practices and responsible industry conduct.
- American Medical Association (AMA): Established guidelines for gifts to Physician from the Industry and provides guidelines on industry subsidies for conferences, meetings, and continuing medical education courses, etc.

Our mandatory compliance training for all employees covers the FCA, FCPA and AKS. We have a Compliance Hotline that is monitored by the Compliance Officer and VP of Human Resources. Employees are trained on the hotline 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 for all employees to follow, ensuring quality is built into every step of the medical devices that Silk Road Medical designs and develops, manufactures, and supplies to customers.

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 agreements.

Silk Road Medical Quality Policy  
Released, March 4, 2020

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

- United States Federal Food, Drug and Cosmetic Act
  - 21 Code of Federal Regulation (CFR) Part 11 – Electronic Records and Electronic Signatures
  - 21 CFR Part 803 – Medical Device Reporting
  - 21 CFR Part 806 – Medical Devices, Reports of Corrections and Removals
  - 21 CFR Part 820 – Quality System Regulations
- European Council Directive 93/42/EEC and Amendments
- ISO 13485:2016- Medical devices – Quality management systems- Requirements for regulatory purposes
- ISO 14971:2007- Medical devices- Application of risk management to medical devices

As regulations continue to evolve and as additional geographies are considered for commercialization, the quality system will be updated accordingly.

Silk Road Medical maintains a current ISO 13485:2016 certificate, the scope of which is:

*Design, manufacture and distribution of peripheral and neurointerventional devices and accessories.*

Silk Road Medical's adherence to the above listed regulations occurs through periodic FDA inspections and annual surveillance audits conducted by our Notified Body. The most recent FDA inspection was conducted in February 2020, resulting in a single Form 483 Notice of Observation relating to the calibration method used for a specific type of measurement tool. Silk Road implemented immediate corrective actions that satisfied FDA's concerns, and the observation was closed by FDA on June 10, 2020. The most recent Notified Body audits (Microbiology and Sterilization Audit, conducted November 10, 2020 and Annual Surveillance Audit, conducted October 1-3, 2019) resulted in no observations or major non-conformances being identified.

### **Post-Market Activities**

Silk Road has a robust communication pathway between employees and Quality Assurance allowing for product complaints or feedback to be documented within 24 hours of learning of the event. All employees are trained on what constitutes a complaint, along with how to report the relevant information. Quality Assurance then reviews and evaluates the information, conducts an investigation, where appropriate, and determines whether or not regulatory authorities, both domestic and abroad, require notification. Furthermore, the information received serves as an input to continuous improvements of the product to meet the needs of customers and patients, alike.

As of October 31, 2020, Silk Road has submitted 228 Medical Device Reports to FDA and has submitted no vigilance reports in the European Union. Of the 228 MDRs, 46 have been related to the ENROUTE Transcarotid Stent System, 160 have been related to the ENROUTE Neuroprotection System, and the balance are initial importer MDRs associated with the ENROUTE 0.014" Guidewire. The top three adverse events reported through MDRs are dissections requiring intervention, embolic strokes, and development of a thrombosis.

To date, there have been no product recalls. There has been one instance of a market withdrawal affecting two lots of the ENROUTE Neuroprotection System, totaling 251 returned units out of over 100,000 devices distributed through the end of Q2 2020. The market withdrawal was initiated in September 2018, to correct for a connection that allowed leakage of blood; there was no impact to safety, but the issue was deemed to be a user inconvenience.

## 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 partners throughout all stages of product design, development, production, and distribution to ensure our processes and products exceed the base regulatory standard.

These partnerships 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 has over 150 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 Medicals' supplier requirements. Silk Road supplier requirements go beyond the functional capability of the supplier with the company assessing a suppliers' risk management processes, production capacity, product specification conformance, site inspection, Quality Assurance/Quality Control testing, regulatory compliance, and continuous improvement processes.

When the company has identified the need for a new component or material, we strive 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 risk profile of potentially impacting patients' 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. All components and materials are inspected by Silk Road Medical Quality Team prior to use. Those inspection levels and quantities are 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 high 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**

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) adopted a final rule to implement reporting and disclosure related to "conflict minerals," as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rule requires manufacturers who are SEC filers to disclose whether the products they manufacture or contract to manufacture contain conflict minerals in those products. Conflict minerals refer to tin, tantalum, tungsten and gold (commonly referred to as "3TG"), regardless of where they are sourced, processed or sold. The final rule is intended in part to bring greater supply chain transparency to the use of such minerals originating from the Democratic Republic of Congo and adjoining countries in an effort to help end the violent conflict which has been financed, in part, by the exploitation and trade of conflict minerals.

Silk Road Medical supports responsible material sourcing and encourages our suppliers to eliminate 3TG from sources that may finance armed conflict and cause human rights abuses.

Silk Road Medical expects its suppliers and supply base to procure material containing 3TG from socially responsible sources in an effort to help end the violent conflict in these regions. Silk Road Medical sources from numerous suppliers and many of our suppliers and their sub-suppliers are private companies or international companies which are not subject to SEC regulations. Silk Road Medical relies on the cooperation of its suppliers to source these materials from socially responsible sources. Silk Road Medical expects its suppliers to undertake reasonable due diligence within their supply chains to determine the origin of the materials and products they supply to us.

## **Commitment to the Environment**

As a growing medical technology company, we work to minimize our impact on the environment and climate change and have therefore incorporated environmentally sustainable practices wherever possible into our facilities and manufacturing operations. As Silk Road Medical continues to grow, we are faced with additional considerations about how our company may impact other areas of society, including expanded responsibilities related to caring for the environment. Our environmental health and safety activities are dual lead by the Vice President, Operations and Vice President, Human Resources.

We endeavor to conserve natural resources and reduce or eliminate adverse environmental risks associated with our business. We seek to comply with, or exceed, all applicable environmental laws, rules and regulations. In addition, we actively seek to implement good-faith standards to reduce our environmental impact, when explicit regulations do not exist.

### **Low Environmental Impact**

Our headquarters footprint is 32,600 square feet and includes an ISO standard registered clean room that is 2,500 square feet. At this facility, Silk Road Medical generates approximately 4 cubic feet of solid recyclable items per week and approximately 4 cubic feet of solid waste per week.

Neither city water nor natural gas is used in our manufacturing operations. We do not have an emergency standby diesel generator or a natural gas boiler onsite. In fact, we have no equipment that has emissions or requires permitting.

Our facility has a 55-gallon natural gas water heater that provides hot water for our restrooms and kitchens. Our HVAC system also uses natural gas. Combined these units use approximately 31.3 Therms / day.

The company's average daily uses of electricity is 1,385.68 kWh / Day. We use LED light sources and both occupancy and daylight sensors to minimize energy use for lighting. On the weekends, air handlers are turned down and television screens are turned off to conserve energy.

Our company is a small-quantity generator of hazardous waste. 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.

### **Recycling and Reuse**

Our HQ location participates in the recycling programs offered by the City of Sunnyvale. All facility garbage and recycling is managed through this city program. All incoming

component, supply packing, and product packaging is removed and also recycled via this program.

In addition, our company policy is to reuse and redeploy returns and expired product effectively. All administrative returns, excess, expired, and obsolete products are re-purposed 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, these 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.

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

### **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 and their families for home use. Electronic materials that cannot be reused internally are recycled by a third-party partner. 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.

## Our Response to COVID-19

The COVID-19 pandemic has forced our society to accept new ways of working and interacting and this will continue to cause a shift in how Silk Road Medical operates both in our Sunnyvale headquarters location and in the hospitals in which we work.

Our headquarters is located in Santa Clara County which was the first county in the nation to issue a shelter in place order effective March 16, 2020. As COVID started to spread across the U.S., Silk Road Medical implemented a remote work policy earlier than our county required, as a precautionary measure to ensure the health and safety of our HQ employees. At the time, we could not have imagined that we would still be under a shelter-in-place order more than 4 months later.

This shift required Silk Road Medical and every member of TCAR Nation to embrace a new way of working and put new energy into creating an office environment that is safe, healthy, and inspiring to work in.

To guide our thinking through our planning process, we created a set of goals that were well communicated internally.

**Our Goals**

- #1 Create a Safe and Healthy Workplace**  
When it's safe to return to our workspace, we want to make sure employees feel at ease and protected. The first weeks and maybe months will be a critical transition time as we slowly come back into the office and back into hospitals.
- #2 Acknowledge Individual Situations**  
We know that even when we are given the green light to reopen our office and reenter hospitals, some employees may be challenged with lack of child care, the need to care for someone else who is sick, or even their own illness.
- #3 Mitigate Germs**  
As more teammates return to the workplace, we will put in place more stringent procedures to mitigate the spread of germs. This will include changes in the environment and changes in our own behaviors.
- #4 Build in Breathing Room**  
We will rethink our workspace and even working times to accommodate for physical distancing.
- #5 Reduce Touch Points**  
We will reduce the number of surfaces employees have to touch through the day.
- #6 Be Flexible**  
Most importantly, we want a safe, healthy and inspiring workplace for all and we will be flexible and thoughtful in how we come back – but we do want to come back!

### Continued support of TCAR cases

While most employees worked from home in March, April and May 2020, many of our essential employees continued to directly support important TCAR cases by supplying our products to hospitals and performing case support in hospitals. In-hospital case support was done under extraordinary safety precautions and also through new, innovative ways using technology to virtually participate in cases.

At Silk Road, guided by our Executive Medical director, we have been monitoring our immediate facilities for safety and wellness according to the California state guidelines, <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Workplace-Outbreak-Employer-Guidance.aspx#>. We implemented many office protocols designed to protect the health and welfare of our employees. We have provided instructions and educational materials to our employees on how to correctly wear safety masks and effectively wash hands. When establishing our policies to protect our employees, we incorporated guidelines from the state of California, which can be found: <https://www.dir.ca.gov/dosh/coronavirus/Health-Care-General-Industry.html>

At our headquarters, we took great measures to ensure the safety of our staff when they returned to the workplace. We instituted daily health checks for all employees entering our facilities and offered access to COVID testing at no costs to our employees. In our office, we implemented policies which incorporated new social distancing guidelines from the WHO and U.S. CDC. In an effort to protect our employees, we reduced the number of people permitted within our offices to allow for 50% capacity, enhanced cleaning protocols and we installed touchless faucets, soap dispensers and auto flush features in all of the office restrooms. In addition, we installed pre-filters in our HVAV systems and added UV Light Photo treatment to increase air circulation, filter and clean the air in our offices. Understanding that our employee's overall health is important, we closed all fitness facilities, including showers while providing alternative suggestions for physical fitness in and around the office. We established a policy of eliminating all shared food in the office.

Reflecting now on our experience, we found this time to be incredibly challenging, but also a time that sparked amazing creativity and innovation. We are moving our business forward and continuing our quest to reduce the devastating impact of stroke on patients and their families.

## Silk Road Medical SASB Index

This marks the first time Silk Road Medical has reported against the Sustainability Accounting Standards Board (SASB) standards. As an rapidly growing healthcare company, we have included disclosures related to the SASB industry standards for Medical Equipment and Supplies industry. Our reporting against the SASB standards 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 Rule	Sustainability Accounting Standards Board (SASB) Framework	Response/Location of relevant information
	<b>Affordability and Pricing</b>	
HC-MS-240a.1	Ratio of weighted average rate of net price increases (for all products) to the annual increase in the U.S. Consumer Price Index	Commitment to Fair Pricing and Access
HC-MS-240a.2	Description of how price information for each product is disclosed to customers or to their agents	Commitment to Fair Pricing and Access
	<b>Product Safety</b>	
HC-MS-250a.1	Number of recalls issued, total units recalled	Dedication to Quality and Patient Safety
HC-MS-250a.2	List of products listed in the FDA's MedWatch Safety Alerts for Human Medical Products database	<a href="https://www.fda.gov/safety/medwatch-fda-safety-information-and-adverse-event-reporting-program">https://www.fda.gov/safety/medwatch-fda-safety-information-and-adverse-event-reporting-program</a>
HC-MS-250a.3	Number of fatalities related to products as reported in the FDA Manufacturer and User Facility Device Experience	<a href="https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfmaude/search.cfm">https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfmaude/search.cfm</a>
HC-MS-250a.4	Number of FDA enforcement actions taken in response to violations of current Good Manufacturing Practices (cGMP), by type	Dedication to Quality and Patient Safety

<b>SASB Rule</b>	<b>Sustainability Accounting Standards Board (SASB) Framework</b>	<b>Response/Location of relevant information</b>
	<b>Ethical and Marketing</b>	
HC-MS-270a.1	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	Silk Road Medical has had no monetary losses associated with false marketing claims to date. When public disclosure criteria are met, monetary losses as a result of legal proceedings associated with false marketing claims are included in the annual 10K report, <a href="https://investors.silkroadmed.com/static-files/18409682-87c5-411a-8db0-a90f5a67200f">https://investors.silkroadmed.com/static-files/18409682-87c5-411a-8db0-a90f5a67200f</a>
HC-MS-270a.2	Description of code of ethics governing promotion of off-label use of products	
	<b>Product Design &amp; Lifecycle Management</b>	
HC-MS-410a.1	Discussion of process to assess and manage environmental and human health considerations associated with chemicals in products, and meet demand for sustainable products	Commitment to the environment
HC-MS-410a.2	Total amount of products accepted for takeback and reused, recycled, or donated, broken down by: (1) devices and equipment and (2) supplies	
	<b>Supply Chain Management</b>	
HC-MS-430a.1	Percentage of (1) entity's facilities and (2) Tier I suppliers' facilities participating in third-party audit programs for manufacturing and product quality	Not Disclosed
HC-MS-430a.2	Description of efforts to maintain traceability within the distribution chain	Commitment to strong supplier relationships
HC-MS-430a.3	Description of the management of risks associated with the use of critical materials	Commitment to strong supplier relationships
	<b>Business Ethics</b>	
HC-MS-510a.1	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	The company has not had any monetary losses as a result of legal proceedings associated with bribery or corruption, company 10K <a href="https://investors.silkroadmed.com/static-files/18409682-87c5-411a-8db0-a90f5a67200f">https://investors.silkroadmed.com/static-files/18409682-87c5-411a-8db0-a90f5a67200f</a>
HC-MS-510a.2	Description of code of ethics governing interactions with health care professionals	Commitment to training and education of surgeons