



SILK ROAD MEDICAL, INC.

SUPPLIER CODE OF CONDUCT

Silk Road Medical, Inc. (“**Silk Road,**” the “**Company,**” “**we,**” “**us**” or “**our**”) endeavors to uphold high ethical standards and strong values in conducting our business. Silk Road respects international human rights principles and holds our suppliers and business partners to the principles expected of our business leaders and employees.

This Supplier Code of Conduct (“**Code of Conduct**”) applies to all direct suppliers that provide components or materials for use in our products. The term “Supplier” means any person or entity that is the source for goods or services. This Code of Conduct applies to all workers and employees of any supplier (including permanent, temporary, contract agency or migrant workers), and includes all persons providing work at a supplier location, such as a service provider. This Code of Conduct also applies to any sub-contractors and third-party labor agencies.

This Code of Conduct aligns with Silk Road’s Human and Workplace Rights Policy and Code of Business Conduct and Ethics. All Suppliers must comply with applicable laws and regulations. In addition, we expect our Suppliers to support our commitment to business ethics and human rights principles by developing and implementing internal business processes in compliance with this Code of Conduct and due diligence practices across their own supply chains.

Suppliers’ acceptance of and adherence to this Code of Conduct plays an important role in our decision to do business with a Supplier and/or to maintain a relationship with a Supplier. We may periodically evaluate our supplier relationships, including monitoring and audits to assess compliance with this Code of Conduct. We may also request planned or unannounced on-site visits or third-party audits. We may also require suppliers to certify that materials incorporated for use in our products comply with laws regarding slavery and human trafficking in the countries where they conduct business.

Business Ethics

All suppliers of Silk Road must comply with all anti-corruption and anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Suppliers must not condone, support or engage in any form of bribery, illegal payments, nor offers of gifts, meals or entertainment to obtain an improper advantage with government officials or business partners. Suppliers must comply with all applicable U.S. and international laws governing corruption and bribery.

Suppliers should disclose any conflicts of interest immediately, if and when, they are identified.

Suppliers should protect their customer's intellectual property, data and any personal information collected, stored or processed and comply with all applicable laws related to such information.

Human Rights

- **Prohibit Modern Slavery:** Suppliers should prohibit all forms of modern slavery in their operations and supply chains, including the following:
 - The use of enslaved, involuntary, forced, prison or debt bondage labor;
 - Involvement in human trafficking or any activity that promotes modern slavery;
 - The use of any corporal punishment or threats of violence or coercion;
 - Payment of recruitment agency fees by the worker;
 - Withholding of original copies of employee identification documents; or
 - Unreasonable restrictions on the ability of a worker to leave the workplace and find alternative employment.
- **Commitment to Prohibit Child Labor:** Suppliers should prohibit child labor in their operations and supply chains and adhere to minimum age provisions of applicable laws and regulations.
- **Commitment to Rights at Work:** Suppliers respect employees' rights to freedom of association, collective bargaining, fair compensation, and safe and healthy working conditions. Suppliers should maintain a workplace that is free from violence, unlawful harassment, intimidation, abuse or discrimination, or other unsafe or disruptive conditions. Suppliers are expected to provide a safe, healthy and sanitary working environment in compliance with all applicable laws and regulations. Suppliers should take reasonable steps to prevent workplace hazards and work-related accidents and injuries.
- **Work Hours and Wages:** Suppliers should compensate their employees relative to the industry and local labor market, and must operate in compliance with all applicable wage, work hours, overtime and benefits laws and regulations.

Grievance and Remedy

Suppliers should have systems in place for employees to submit grievances and demonstrate that such concerns are investigated and reviewed. Suppliers should enable grievance mechanisms that are accessible and may be used without fear of reprisal.

Suppliers should not retaliate against any person who raises questions or concerns about related corporate activities and should protect whistle-blower confidentiality and prohibit retaliation against employees reporting grievances.

Traceability

Suppliers should enable complete traceability for all components, sub-assemblies and materials throughout the manufacturing process, from purchase order receipt through production and distribution to Silk Road. Suppliers should be able to disclose the country of origin for any primary materials for all deliveries made to Silk Road. We reserve the right to ask suppliers for a full supply chain map to facilitate risk assessment and compliance. Suppliers should be transparent about sourcing and known facilities used to produce products or services for Silk Road and must provide such information upon request.

Environment

Suppliers should comply with all applicable environmental laws and regulations including those related to waste disposal, hazardous waste, wastewater, and toxic substances. Suppliers should have systems and processes in place to monitor their emissions and waste and should take a continuous improvement approach to enhance their environmental performance, including actively seeking to reduce energy, water, and material consumption.