

PENUMBRA, INC. SUPPLIER CODE OF CONDUCT

INTRODUCTION

Penumbra, Inc. (“Penumbra”, “we”, or “us”) is committed to ensuring safe working conditions, treating workers with respect and dignity, using environmentally responsible manufacturing processes, and conducting business ethically and with integrity, both for itself and its supply chain. These values are essential to Penumbra’s ability to realize our vision of building a business that focuses on bringing new treatments to help as many people as possible. This Supplier Code of Conduct (this “Code”) serves as the foundation of our relationship with our suppliers (“Suppliers”), creating a mutual understanding of Penumbra's core values and principles. We expect Suppliers to adhere to ethical business practices and abide by all applicable laws, rules, and regulations and the principles set forth in this Code. We also expect Suppliers to use their best efforts to implement these standards with their suppliers and subcontractors. Penumbra regularly evaluates Suppliers through periodic communication and audits as needed to confirm their compliance with this Code. If a Supplier is in breach of these principles and cannot agree on an improvement plan or does not implement it, we will reconsider the continuation of our commercial relationship with such Supplier.

ETHICS

Suppliers shall foster a culture of honesty, integrity and accountability and act with the highest level of ethical conduct in all business activities, including interactions and relationships with employees, customers, suppliers, competitors, the government, and the public. The ethics elements include:

Business Integrity

Suppliers shall deal fairly with customers, suppliers, competitors, and the public at all times and shall not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair business practice. Any corruption, extortion, money laundering or embezzlement is prohibited. Suppliers shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. Suppliers shall employ ethical business practices, including compliance with trade controls and sanctions regimes. Suppliers shall implement and maintain appropriate systems that facilitate compliance with applicable laws, regulations, and standards.

Antitrust and Fair Competition

Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable antitrust laws. Suppliers must not collude with competitors to set prices or terms of sale or to divide up customers, suppliers, or markets. Suppliers must not solicit the confidential business information of a Penumbra competitor for the purpose of providing such information, directly or indirectly, to Penumbra.

Whistleblower Protection and Anonymous Complaints

Suppliers shall provide an anonymous complaint mechanism for workers to report workplace grievances in accordance with local laws and regulations. Suppliers shall create programs to ensure the protection of whistleblower confidentiality and prohibit retaliation against workers who participate in such programs in good faith.

Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard customer data; transfer of technology and know-how must be done in a manner that protects intellectual property rights.

LABOR

Suppliers shall uphold the rights of workers and treat them with dignity and respect. The labor elements include:

Antidiscrimination

Suppliers shall not discriminate against any worker based on race, ethnicity, age, gender, sexual orientation, disability, religion, political affiliation, national origin, marital status, or any other criteria prohibited by law in hiring and employment practices such as promotions, job assignments, wages, benefits, discipline, and termination.

Fair Treatment

Suppliers shall provide a workplace free of harsh and inhumane treatment or harassment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers.

Prevention of Involuntary Labor and Human Trafficking

Suppliers shall not use, or benefit from, any form of slave, forced, bonded, indentured, or prison labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, or fraud. All work must be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice.

Child Labor

Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment.

Wages and Benefits

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime and mandated benefits, and ensure compensation of a living wage according to local living conditions.

Freedom of Association

Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, collectively bargain and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

HEALTH AND SAFETY

Suppliers shall provide a safe and healthy working environment for their employees. The health and safety elements include:

Worker Protection

Suppliers shall seek to prevent and reduce workplace risks and injuries and to maintain and improve the safety of its employees and workplace. Suppliers shall identify, evaluate, and control worker exposure to hazardous chemical, biological, and physical agents. Suppliers must eliminate chemical hazards where possible. Where chemical hazards cannot be eliminated, Suppliers shall establish appropriate controls for safe work procedures, including the proper management, handling and disposal of hazardous materials and the use of personal protective equipment.

Occupational Safety Procedures and Systems

Suppliers shall establish procedures and systems to manage, track, and report occupational injury. Such procedures and systems shall encourage worker reporting, classify and record injury cases, investigate cases and implement corrective actions to eliminate their causes, provide necessary medical treatment, and facilitate the workers' return to work.

Health and Safety Communication

In order to foster a safe work environment, Suppliers shall provide workers with appropriate workplace health and safety information and training, including written health and safety information and warnings. Suppliers shall post Material Safety Data Sheets for any hazardous or toxic substances used in the workplace, and properly train workers who will come into contact with such substances in the workplace.

ENVIRONMENT

Suppliers shall conduct their business in compliance with all applicable environmental laws and regulations, engage in sustainable practices, including with respect to manufacturing, transport, use and disposal of products, and reduce their impact on the environment wherever possible. Suppliers are encouraged to conserve natural resources, minimize electrical consumption, recycle and reuse materials, avoid the use of hazardous materials where possible, and utilize packaging that incorporates recyclable materials and efficient design. The environmental elements include:

Environmental Authorizations

Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, and registrations shall be obtained, and their operational and reporting requirements followed.

Waste and Emissions

Suppliers shall use resources efficiently, apply energy-efficient and environmentally friendly technologies, reduce waste and emissions to air, water and soil, as well as minimize any negative impact on biodiversity, climate change and water scarcity. Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges, and to prevent and mitigate accidental spills and releases to the environment. Any emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release.

Conflict Minerals

Suppliers shall undertake reasonable due diligence to avoid the use of “Conflict Minerals”, i.e., columbite-tantalite, cassiterite, wolframite (or their derivatives tantalum, tin and tungsten) or gold sourced from the Democratic Republic of the Congo (DRC) or an adjoining country that have directly or indirectly financed or benefitted armed groups in the DRC or an adjoining country, in materials, parts or products supplied to Penumbra. Suppliers shall have systems in place that are designed to meet these objectives.

CONFIDENTIALITY AND PRIVACY

Suppliers shall take precautions to avoid improper, inappropriate or inadvertent disclosure of confidential information. Suppliers’ information systems that contain confidential information and data shall be appropriately managed and protected against unauthorized access, use, disclosure, modification or destruction. Suppliers shall safeguard confidential information to ensure that privacy rights are protected, shall maintain such information in strict confidence, and shall only disclose such information to those who have a legitimate need to know about it. Supplier shall also comply with all applicable privacy and data protection laws.

CONTACT

Should you have any concerns about illegal or improper conduct, please contact Penumbra using the following link: <https://penumbra.integrityline.com/>