

Code of Business Conduct & Ethics



A message from our CEO

Dear Team Members,

We at Nevro share the common goal of helping more patients with chronic pain achieve greater, lasting relief, and we aspire to be the global leader in innovative, data-driven approaches to the management of chronic pain. Each of us plays an essential role in ensuring that Nevro fulfills its goals in a manner that is consistent with our values-based culture. We have a commitment to one another, our shareholders, our communities, our regulators, and most importantly, our patients to adhere to the highest standards of integrity in all aspects of our business.

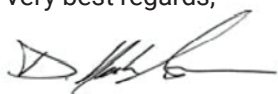
In keeping with this objective, Nevro's Code of Business Conduct & Ethics, also known as the Code, is our guidebook to understand what is expected of each member of the Nevro team. It serves as our primary resource in making day-to-day decisions and resolving ethical issues that we may face as we interact with others. Of course, the Code cannot address every possible situation that may arise. However, it is rooted in common sense and designed to provide a useful framework to guide you in your daily conduct. Ultimately, we all must listen to one another, ask questions, and hold ourselves and each other accountable to the highest standards of personal integrity and the values embodied in this Code.

Please take some time to read and understand our Code. I encourage you to speak up if you have a concern and to seek guidance any time you are unsure about the right thing to do. We know that speaking up takes courage, and you should have confidence that you will not face retaliation if you raise concerns or seek guidance. You can trust that Nevro will investigate fairly and take appropriate action that demonstrates our company's values.

At our core, Nevro is about driving superior outcomes for the people we serve and the communities we interact with. Nevro's business, our very reason for being, is to do good and to help people who desperately need it. Let's continue to inspire confidence and trust among our patients and partners that, at Nevro, we are committed to leading by example and conducting our work with the utmost integrity and transparency.

Thank you for your active participation, support, and dedication to Nevro.

Very best regards,



D. Keith Grossman, Chairman, Chief Executive Officer and President

"At our core, Nevro is about driving superior outcomes for the people we serve and the communities we interact with."

D. Keith Grossman
Chairman, Chief Executive Officer and President



Embracing Our Mission and Values

Nevro was established with the simple goal of helping more patients with chronic pain achieve greater and lasting relief. By combining the brightest talent with the strongest foundation of clinical evidence, we deliver comprehensive, life-changing solutions that continue to set the standard for enduring patient outcomes in chronic pain treatment. With Nevro products, tens of thousands of patients worldwide now enjoy more freedom and improvement in their daily lives, including in areas that have traditionally been difficult to treat with traditional, low-frequency spinal cord stimulation.

Values



Patients First

At Nevro, we seek to enhance patient care and consider patient impact in all decisions. We are relentlessly dedicated to improving outcomes and guided by the mission of providing only the most scientifically-advanced therapies.

One Team

We are all part of Nevro first, not a particular department. We build and collaborate cross-functionally, making for better decisions, fewer mistakes, faster progress, and limitless possibilities. We stay committed to leveraging the strengths, ideas, and experiences of each team member to optimize performance as One Team.

Courageous Leadership

At Nevro, we believe that leadership is part of your character and your behavior, not based on your title. Everyone can and should lead by example. Our success is everyone's responsibility, and everyone is expected to take ownership and be part of the answer.

Ownership

Hold yourself and those around you accountable for delivering on Nevro's commitments to our customers, patients, shareholders, and each other. We expect team members to contribute by knowing what good looks like in advance and being honest about the results. We grow stronger when we are willing to identify issues and challenge deficiencies.

Elevate Diversity

Diversity in opinions, approaches, experiences, backgrounds, and lifestyles makes us more powerful, so we champion it. We listen for complete understanding, and always act with inclusion and respect. We seek to lift up customers and team members, and encourage new ideas and diverse ways of thinking.

Do the Right Thing

At Nevro, we act with integrity and always do the right thing. We must follow all applicable laws, regulations, and company policies, both in letter and in spirit. This is critical to our success, and it protects you, our business, and the patients and customers we serve.

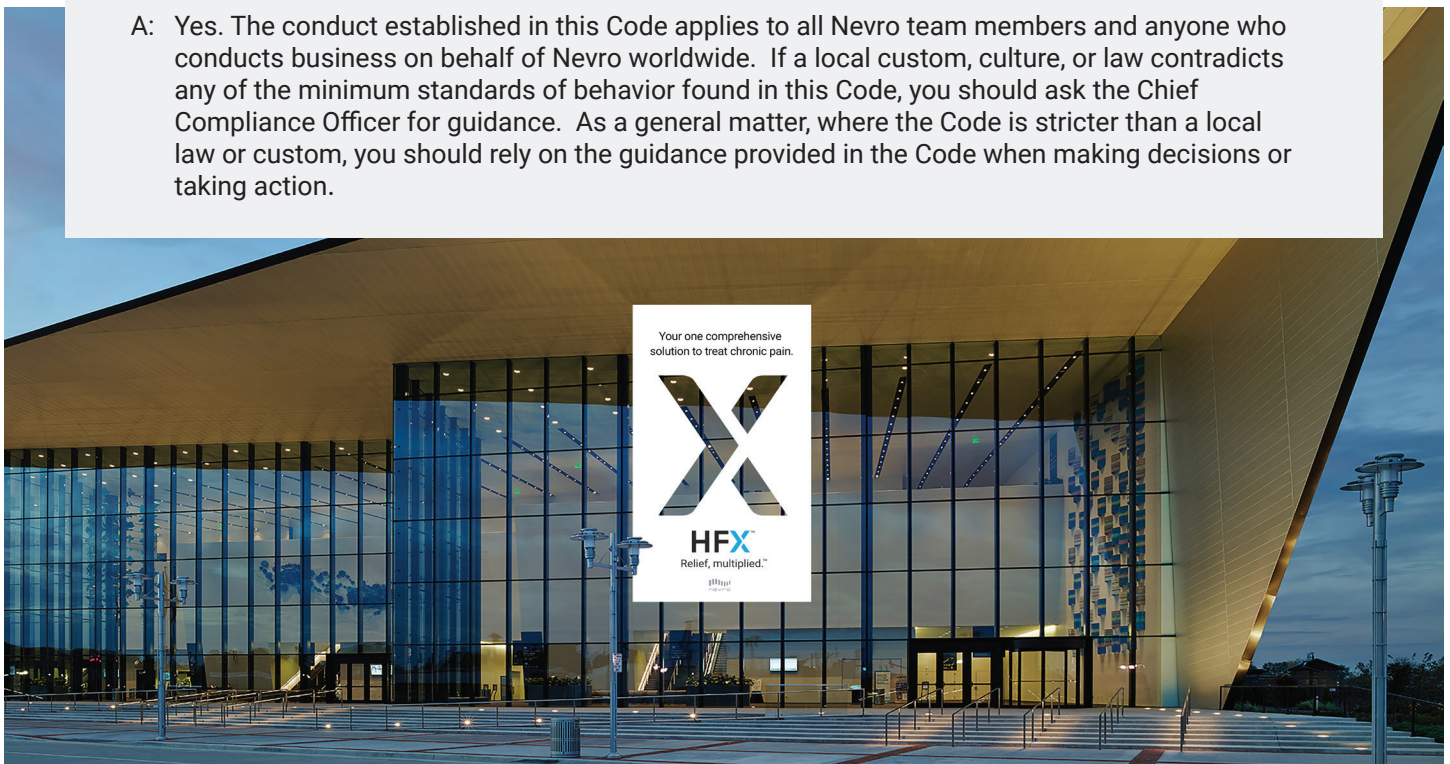
Understanding Our Code

Each Nevro team member makes decisions every day to drive our strategies to help patients lead their best lives, free from the burden of chronic pain. Some of these decisions might be straightforward and clear, but others may not be. It is not always easy to know how to do the right thing in every situation. That is why we have developed this Code of Business Conduct & Ethics. Our Code aims to support you in exercising good judgment and making informed choices for the company, for other team members, for our patients, for our customers, and for yourself. Our reputation is a valuable asset earned through the behavior of team members past and present. We all have a personal responsibility to uphold Nevro's reputation through our daily interactions and efforts to achieve our patient-focused mission.

Nevro's Code applies to all Nevro operations worldwide. This Code governs Nevro's directors, officers, and team members, from the most senior members of the executive team to our sales personnel, to manufacturing supervisors and hourly team members. We also expect that our contractors, distributors, suppliers, consultants, and other third-party representatives adhere to this Code when performing services and engaging in activities on Nevro's behalf.

Q: Different countries have different laws, regulations, and local customs when it comes to how Nevro does business. Does this Code apply to everyone globally?

A: Yes. The conduct established in this Code applies to all Nevro team members and anyone who conducts business on behalf of Nevro worldwide. If a local custom, culture, or law contradicts any of the minimum standards of behavior found in this Code, you should ask the Chief Compliance Officer for guidance. As a general matter, where the Code is stricter than a local law or custom, you should rely on the guidance provided in the Code when making decisions or taking action.



The Code not only states the policies that Nevro has committed to follow, but also the principles and core values that form the basis of how we will operate. The Code is further explained and implemented through our corporate policies and procedures.

Understanding Our Code

What's Expected of Me?

All Nevro team members are held to the same compliance and ethical standards, regardless of their level of seniority or position with the company. You are expected to:

- Read, understand, and follow this Code, as well as the laws, regulations, and policies that apply to your work on behalf of Nevro;
- Ask questions and seek guidance when you are unsure of how to handle any business situation, or if Nevro's policies are unclear or do not specifically address an issue;
- Speak up if you see or suspect a violation of our Code, Nevro's policies, or the law;
- Cooperate truthfully with any investigations;
- Never retaliate against another team member for raising a question or reporting what they believe is a violation of this Code, company policies, or the law; and
- Always model professional, honest, and ethical behavior.

People leaders have additional responsibilities to ensure compliance with the Code:

- Lead with integrity and be a positive role model for your team;
- Help team members understand how the Code, Nevro's policies, and applicable laws apply specifically to their work on Nevro's behalf;
- Create a safe environment in which team members feel comfortable discussing ethical or compliance questions, issues, or concerns;
- Recognize and reward behaviors that model our core values, including by considering ethical and compliant conduct when evaluating team member performance; and
- Take any concern raised by your team members seriously and address or escalate them appropriately.

Guidelines for Good Decisions

Our Code addresses a variety of ethical situations, but it cannot speak to every possible scenario. When you are unsure about how to approach a situation, ask yourself the following questions:

1. Is this consistent with Nevro's six core values, our Code, and our policies?
2. Is this good for Nevro, **our patients**, our customers, or other stakeholders?
3. Would I be comfortable if my actions were shared on social media or in the news?

If you can comfortably answer yes to each of these questions, it is likely acceptable to proceed. If you answer no or maybe to any of these questions, ask for help before you act. Remember you can always reach out to the Compliance Department – we are here to help.

Understanding Our Code

Asking Questions and Raising Concerns

Whether it is reporting misconduct or asking questions about difficult situations, speaking up about anything that might seem unethical or unlawful helps Nevro address small issues before they potentially turn into big problems. This way, we can stay focused on our mission of helping more patients achieve lasting relief from chronic pain. If you believe someone is violating our Code, our values, our policies, or the law, we encourage you to speak up immediately. Ensuring compliant behavior is the responsibility of every Nevro team member.

In many cases, your manager might be the best resource to turn to if you have a concern or a question. Your manager will usually know the most about your role, responsibilities, and day-to-day work. This makes them well-positioned in most cases to provide answers and guidance or direct you to the right resource.

When you contact the Compliance/Ethics Hotline, you may choose to do so anonymously. Whether you report anonymously or share your identity, Nevro will review your information carefully, take it seriously, and handle it appropriately. This could include an investigation, and where necessary, corrective actions to address issues, learn from mistakes, and avoid them going forward.

If you are uncomfortable speaking directly with your manager about the issue, or your manager was involved in the potential misconduct, there are many other options including:



People Team

business.partners@nevro.com



Chief Compliance Officer

Directly or via compliance@nevro.com



Compliance and Ethics Hotline

Accessible at www.nevro.ethicspoint.com

This page also has telephone numbers if you prefer to reach out by phone.



Legal Department

legal@nevro.com

Q: If I submit a report through the Compliance/Ethics Hotline and identify myself as the reporting person, should I expect a response? What information will be shared with me?

A: Yes. We will promptly respond to all questions or concerns raised with the Compliance Department – whether directly to the Chief Compliance Officer or via the Compliance/Ethics Hotline – in a comprehensive manner. However, because we respect confidentiality, detailed information about the investigation or the outcome may be shared only on a need-to-know basis.

Understanding Our Code

Our Commitment to Non-Retaliation

It is important that Nevro ensures an open, accessible, and transparent environment where all team members feel comfortable coming forward with questions, comments, or concerns regarding actual or potential misconduct. Retaliation of any form against a team member who reports, in good faith, a potential compliance issue or wrongdoing will not be tolerated at Nevro. Acts of retaliation violate our Code and are subject to strict disciplinary action.

Examples of retaliation may include, but are not limited to, denial of benefits or promotion, demotion, termination, suspension, verbal or written threats, physical violence, or harassing comments or conduct. If you believe that you or another team member has been retaliated against for raising a question, seeking guidance, voicing a concern, reporting misconduct, or participating in an investigation, you should notify the Chief Compliance Officer or the People Team immediately. You may also make a report to the Compliance/Ethics Hotline if you prefer to remain anonymous.

When Issues Happen

Our Code reflects our company and our culture. Any violations of Nevro's Code, policies, or the law damages the reputation Nevro has worked hard to build and the trust of our customers, shareholders, regulators, third parties and most importantly, our patients. That is why we take any violations or potential Code issues seriously. Violations of our Code or policies can lead to disciplinary action for anyone involved. This may include, for example, mandatory training, verbal or written warnings, being placed on administrative leave, loss of incentive compensation or even termination of employment or contract with Nevro. A team member may also face significant legal consequences, including civil, criminal, or administrative penalties when a law has been broken.

Respecting Each Other

Promoting Diversity and Fair Treatment in the Workplace

It is part of our cultural fabric to embrace the richness and true innovation that comes from having a diverse, inclusive global workforce. We achieve success and are at our best when we capitalize on our differing perspectives, backgrounds, and experiences.



We fiercely champion the open sharing of ideas and courteous communication in order to better serve our various stakeholders by:

- Having a cooperative environment, rooted in trust, fairness, and mutual respect
- Encouraging everyone to keep bias out of your decision-making
- Paying careful attention to our actions and be mindful of stereotypes or other biased thinking that might influence how we behave or engage with others




We expect all Nevro team members to conduct themselves in a professional manner and refrain from comments or activities that make others feel uncomfortable at work by speaking up if you see:

- Intimidation, hostility, pressure, harassment, discrimination, and other inappropriate behavior of any kind
- Workplace bullying, including cyberbullying
- Verbal abuse, physical intimidation, assault; or intentionally damaging or sabotaging another person's work area, property, or work performance

Q: I was on a business trip with a coworker who pressured me to go out for drinks and repeatedly made comments about my religious beliefs that made me uncomfortable. I asked them to stop, but they wouldn't. It was after-hours and outside the office. Is this still considered harassment?

A: Yes. This type of conduct is unacceptable, not only during working hours, but in all work-related situations, whether or not on company property. Asking your coworker to stop, as you have done, is the first step. Tell your coworker such actions are inappropriate and inconsistent with Nevro policy. If they continue, however, you need to report the problem to your manager or the People Team.



Respecting Each Other

Equal Opportunity Employment

Nevro is an equal opportunity employer. We are committed to administering all employment decisions and personnel actions without regard to race, color, religion, sex, age, national origin, ancestry, disability, pregnancy, sexual orientation, genetic information, or any other protected characteristic as established by law. We make employment decisions on the basis of a person's qualifications and our current business needs. Further, consistent with applicable law, Nevro will make reasonable accommodations for qualified individuals with disabilities, as well as our team members' religious beliefs and practices.

Each of us has a right to be treated with dignity and to be fairly compensated for the work we do for Nevro. That includes everyone who works at Nevro, as well as all suppliers and other third-party representatives we engage to perform services on our behalf. We are committed to complying with all labor laws that apply to us everywhere we operate and, beyond simply adhering to the law, we want to do what is right.

Environmental Health and Safety

Nevro is committed to providing a safe and secure workplace in all our facilities, wherever they are located. Each of us plays an important role in ensuring a positive safety culture and a healthy work environment. We expect team members to be diligent about protecting themselves and others by following safety protocols; staying alert; and speaking up when they learn of a potential hazard or unsafe practice as part of their work, no matter how minor it might seem.

Nevro is focused on continually evaluating our sustainability issues for the future to ensure that we are doing our part as corporate citizens to promote the safety and health of our environment. At our manufacturing facility in Costa Rica, we are working to ensure that facility operates consistent with the highest environmental sustainability standards. For further information, see Nevro's ESG Report.

Ensuring Team Member Privacy and Confidentiality

We respect and protect the confidentiality of all prospective, current, or former team members' personal information. If your work involves handling such sensitive information, you are responsible for knowing and following applicable law and Nevro's policies surrounding access, use, transmission, storage, and disposal of team members' personal information. You are also obligated to limit access to this information to authorized individuals with a legitimate business need to know. Ensuring the confidentiality of our team members information is important to maintaining a safe and trustworthy workplace.

Putting Patients First

Ensuring Safe, High-Quality Products and Services

Nevro is committed to developing and providing safe, reliable, and high-quality products and services to help manage, treat, and alleviate the burden of chronic pain for patients around the world. We strive to not only meet, but exceed, customer and regulatory requirements regarding research, development, manufacture, packaging, testing, and supplying our products. All team members, as well as Nevro's suppliers and other third-party representatives, must comply with all applicable processes, policies, and procedures designed to ensure the safety, efficacy, and quality of our products. We all share the obligation to promptly raise any concerns regarding the quality of our products or services, or any ethical concerns about clinical treatment involving our products or services.

As a leader in next-generation, evidence-based approaches to the management of chronic pain, Nevro takes complaints or possible adverse events involving our products seriously. We will promptly investigate and, as necessary, report such incidents consistent with the regulatory requirements of the countries in which we do business.

Promoting Our Products with Integrity

Because Nevro's products are medical devices, we need to be more intentional and thoughtful about marketing and promotion than most other industries. What is acceptable or unacceptable to say about our products is highly regulated and often depends on the specific information that we provide to regulators in the countries where Nevro operates. Our customers and the patients they serve ultimately depend not only on the quality of our products, but also on the quality of the information we distribute or otherwise communicate to the medical community and the public.

Q: A physician told me one of our promotional pieces doesn't make sense and could be improved by citing a recent journal article that was published. I copied and pasted from the one-pager, made some changes to the piece and shared it with the physicians I call on. Can I share the materials with my regional team?

A: No. We must never unilaterally alter marketing or promotional materials because of the risk they could be inconsistent with the FDA-cleared or approved product labeling information. You should contact the Marketing Department to discuss any thoughts or suggestions you might have on improving our marketing materials in terms of their content or clarity.

Any information that Nevro disseminates about our products must be useful, accurate, able to be substantiated with well-documented scientific evidence, and consistent with applicable legal and regulatory standards. Always remember that Nevro can be held responsible for any reasonable interpretations someone might have of the claims we make regarding our products.

Comments about and comparisons to our competitors' products must be fair, substantiated, and in compliance with all laws. We should never disparage competitors' products, services, or personnel.

Putting Patients First

Engaging with Health Care Providers

The success of Nevro's business depends on our collaborating in an ethical and transparent manner with health care providers, whether it be to support the effective use of our products and services, improve patient care, develop innovative products, or support research and education for the broader medical community. Such interactions may take the form of, for example, meetings, speaking events, symposia, product promotion, research or educational events, or consulting agreements.

We understand the importance of the relationship between patients and their health care providers. Nevro empowers health care providers to make informed, patient-centered decisions by observing appropriate practices when interacting with individual health care professionals and hospitals and other institutional purchasers of our products. Team members must remain aware of and comply with all applicable laws and Nevro policies that govern relationships with health care providers in the countries in which we do business.

We must never offer or provide any improper inducement – such as gifts, entertainment, administrative or practice support services, or recreation – to a health care provider in order to incentivize or reward the health care provider's recommendation or use of Nevro's products. Our decisions to engage health care professionals – and what we pay for their services – are never intended to influence their independent medical judgment when it comes to the recommendation or use of Nevro's products.

Q: One of the physicians in my territory wants to meet to discuss some questions about a Nevro product. The physician suggested I make reservations for the tasting menu with wine pairings at a local Michelin starred restaurant this weekend so we could do so. I'm aware of at least two other competitors that do this regularly with physicians. As long as we discuss business during the event, shouldn't this be okay?

A: No. High-end venues or alcohol-oriented events such as wine tastings, wine pairing, or happy hours, are not permitted. Team members are not permitted to offer or provide gifts, entertainment, or recreation to physicians, as this could improperly influence, or at minimum have the appearance of attempting to influence, their decision-making. The fact that "everybody does it" is not an acceptable justification for failing to follow Nevro's Code and policies. Any in-person meetings with the physician to discuss business matters should take place at their office, a restaurant conducive to business discussions or an approved company event.

Putting Patients First

Advancing Clinical Research

We are committed to ensuring the safety of the patients and volunteers who take part in our clinical studies, and to upholding the highest ethical, scientific, and clinical standards in all of our research initiatives worldwide. All Nevro-sponsored clinical studies are designed and conducted in accordance with applicable laws, regulations, and recognized medical and ethical standards. Our policies are intended to ensure Nevro's respect for the health, wellbeing, and safety of research participants, as well as for the culture, laws, and regulations of the countries in which studies are conducted. Nevro recognizes the importance of making clinical study results available, and seeks to ensure that publications reporting on our sponsored research activities are accurate, objective, and contain appropriate disclosures.

Safeguarding Patient Information

We must at all times maintain the privacy of personal information related to our patients. In many countries, personal information includes any information that can identify an individual, including information such as an individual's name, address, medical information, telephone number, and any other unique identifiers (such as date of birth or insurance information). Team members must comply with Nevro's privacy policies as they pertain to protecting personal information, including patient information, and applicable laws and regulations. Along these lines, team members must adhere to the following:

- ✓ Make sure that personal information related to patients is kept strictly confidential and is only used or disclosed in accordance with applicable laws after appropriate notice is given and/or the patient's consent is obtained (if required);
- ✓ Collect personal information only for legitimate business reasons;
- ✓ Take adequate precautions to safeguard personal information;
- ✓ Do not share personal information with anyone who does not have a legitimate need to know such information as determined by Nevro's policies; and
- ✓ Never sign agreements with third parties on behalf of Nevro regarding access to or use of patient information. If a customer or other third party asks you to sign a business associate agreement or similar document, you must direct the request to the Legal Department.

Q: I am a sales representative, and one of the health care providers in my territory just got married. Can I send her flowers or a fruit basket as an expression of congratulations?

A: No. While this is a thoughtful gesture, team members may only provide items to health care providers that are intended for the benefit of the patient or serve a genuine educational function. We cannot provide flowers, fruit baskets, or any other gifts to health care providers that are intended for their personal benefit, even if well-intentioned and meant to recognize a significant life event.

Protecting Our Organization

Avoiding Conflicts of Interest

We should all be aware of any potential influences that may impact our loyalty to Nevro. Team members should avoid situations where their personal interests – or those of their immediate family members – conflict, or might appear to conflict, with those of Nevro. Nevro expects team members to promptly disclose any possible conflicts of interest, in writing, to the People Team and the Chief Compliance Officer so that the matter can be appropriately evaluated. Approval of the action or relationship creating the actual or potential conflict will not be granted unless Nevro determines that it will not interfere with your duties to our company or harm Nevro. If you have questions or are uncertain as to whether a particular relationship or transaction constitutes a potential conflict of interest, you should consult your manager or one of the other resources mentioned in this Code .

For example, we should avoid significant personal investments in a customer, supplier, or competitor. Team members should refrain from working in any capacity for a customer, supplier, or competitor, or otherwise moonlighting where it conflicts or creates an appearance of a conflict with their work for Nevro. Likewise, we should not have any direct supervisory influence on the job evaluation, pay, or benefits of any family member or anyone with whom we have a similarly close relationship. Finally, we should take care not to use our position at Nevro, or any Nevro resources, for our own personal gain.

Understanding Gifts and Entertainment

To preserve Nevro's reputation for integrity, we must never place ourselves under an actual or apparent obligation to anyone by accepting or giving gifts that are intended – or might appear to be intended – to influence business judgment. A team member may never solicit gifts, entertainment, or other benefits from potential or actual customers, suppliers, or competitors, and generally may not accept such items without the approval of their manager. It is permissible to accept perishable items, such as coffee or cookies, or modest meals in connection with a legitimate business purpose from a customer, supplier, or competitor, if consistent with local laws and Nevro policy.

Except as otherwise authorized by Nevro policy, we will never offer or give gifts intended for the personal use of an employee or agent of another corporation, organization, or governmental entity, because such items could be perceived as being in return for favorable business decisions or the recommendation or use of Nevro's products. It is permissible to occasionally offer or give a health care provider items that serve a genuine educational function and do not have value outside of the health care provider's practice – for example, a medical textbook or a spine model – or are for the sole benefit of patients – for example, educational brochures. You may also provide modest meals to customers and health care providers in connection with a legitimate business purpose and in accordance with relevant Nevro policies.

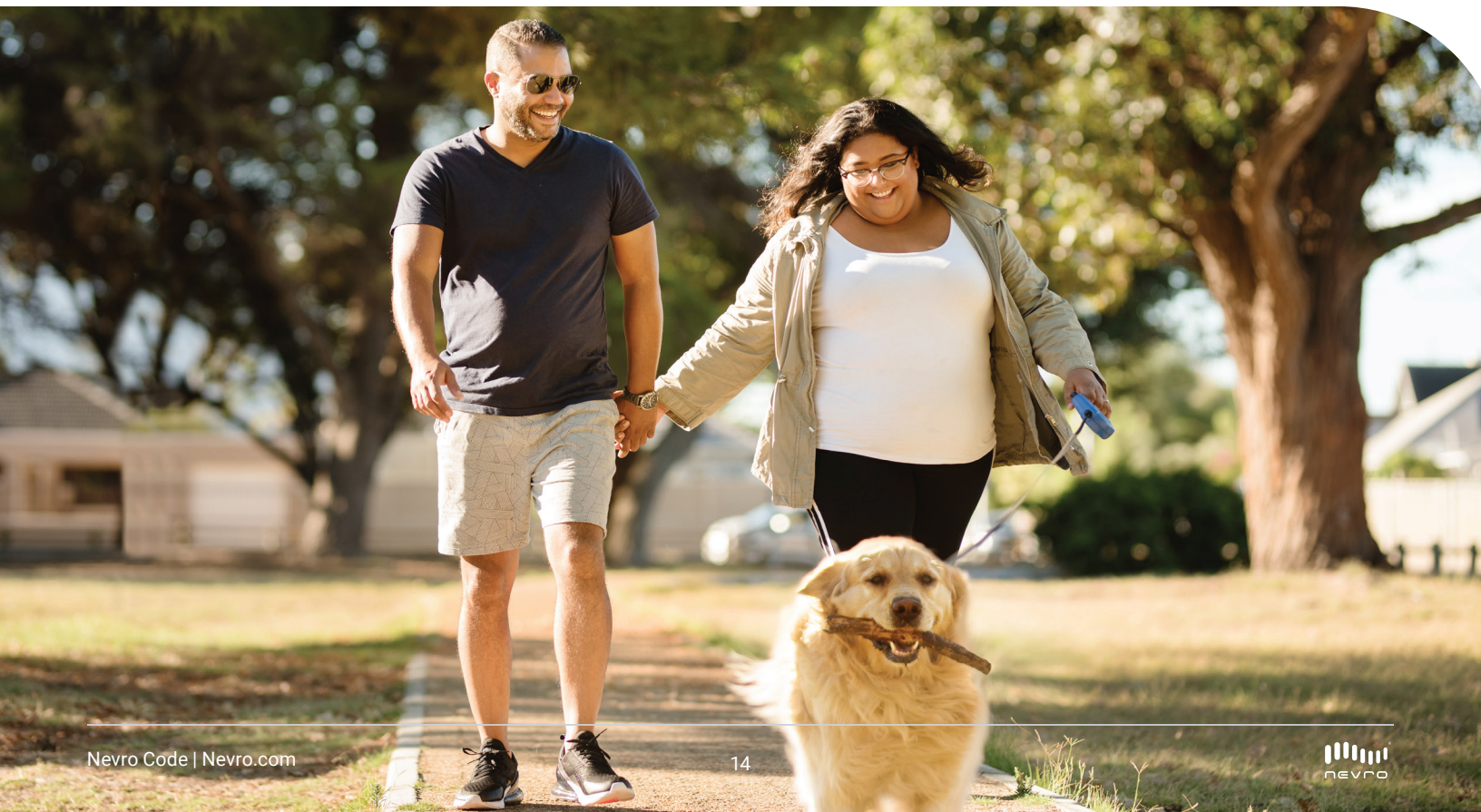
Protecting Our Organization

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Protecting Company Assets

We all have a responsibility to dedicate Nevro's assets toward our goal of helping patients achieve lasting relief from chronic pain. It is important that we use our company's resources wisely to maximize productivity and efficiency as we work towards our mission. This includes tangible assets (such as products, equipment, electronic devices, vehicles, work time, funds, and facilities), as well as intangible assets (such as business opportunities, intellectual property, trade secrets, business information, and Nevro's reputation). No matter what your role with Nevro, you should only use the company's resources as needed for business purposes, and should never waste, misuse, or remove them from Nevro's property without permission.



Protecting Our Organization

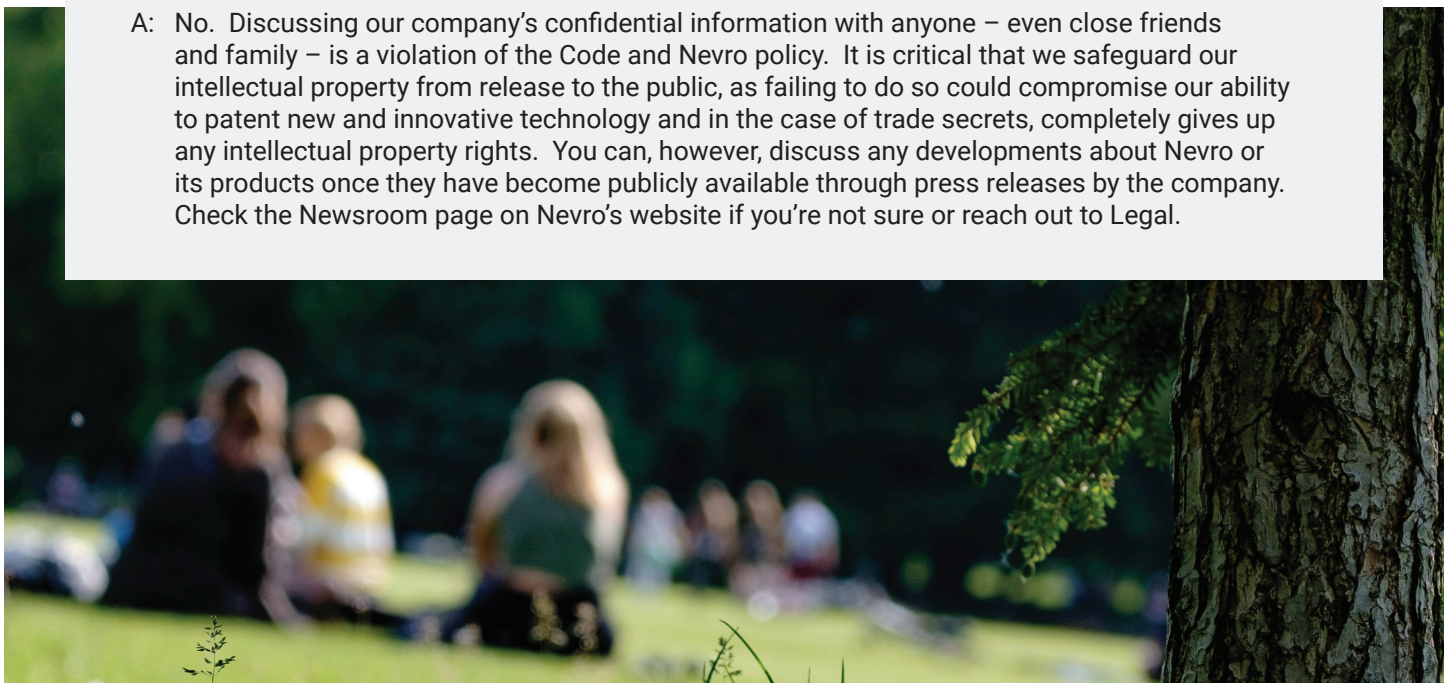
Shielding Confidential Information

At Nevro, we pride ourselves on developing next-generation technology and products for the treatment of chronic pain, and leveraging data to achieve better patient experience, customer satisfaction, and clinical outcomes. Our confidential information is one of our most valuable assets, and each team member has a responsibility to protect this information. Confidential information includes any non-public information that a team member may learn about Nevro – or anyone with whom we do business, such as suppliers or customers – by virtue of their position with the company. This may include, but is not limited to, information about our financial condition, prospects, or plans; marketing and sales programs; research and development information; intellectual property including trade secrets; or any other information that might be of use to our competitors, of interest to the press, or harmful to Nevro if it were publicly disclosed.

Team members should not share confidential information with anyone who does not have a legitimate need to know it for a business reason. This includes other Nevro team members. You should avoid discussing confidential information in public where it could be overheard and take care when using laptops or mobile phones to ensure the screen is not visible to those around you. Keep in mind that, if you leave Nevro to work for another company, you still have an obligation to protect our confidential information and trade secrets. We never ask new hires to share confidential information from a previous employer, and we expect that former Nevro team members will honor their confidentiality obligations to us as well.

Q: I'm on the Product Development team, and we just received the green light to proceed with a cutting-edge improvement to one of Nevro's products that we predict will have groundbreaking implications. Am I allowed to talk about this with my friends and family at Thanksgiving?

A: No. Discussing our company's confidential information with anyone – even close friends and family – is a violation of the Code and Nevro policy. It is critical that we safeguard our intellectual property from release to the public, as failing to do so could compromise our ability to patent new and innovative technology and in the case of trade secrets, completely gives up any intellectual property rights. You can, however, discuss any developments about Nevro or its products once they have become publicly available through press releases by the company. Check the Newsroom page on Nevro's website if you're not sure or reach out to Legal.



Protecting Our Organization

Ensuring Accurate Recordkeeping and Financial Reporting

As a public company, Nevro has an obligation to regulators and to our shareholders to produce full, fair, accurate, timely, and understandable public disclosures based on complete and correct information. No matter what work we do for Nevro, the records that we create or work on must always be complete, accurate, and clear. Such records may include things like quality records, expense reports and invoices, sales activity reports, manufacturing and production reports, financial statements, research or clinical trial data, environmental records, contracts, and employment files. We should never attempt to hide or distort the truth in any records, no matter how inconsequential a record may seem. If you work on Nevro's financial disclosures, it is especially important to be sure that they are always fair, truthful, and accurate, and that they meet generally accepted accounting principles.

Every team member has a personal responsibility to maintain and manage our company's records, whether in hard copy or electronic form, in compliance with Nevro's policies. If you learn of any potential destruction, falsification, mishandling, or other improper behavior involving our records, you should immediately notify your manager or report the issue using one of the other methods listed in this Code.

Speaking on Behalf of Our Company

Nevro is committed to providing accurate and consistent information to the public. In order to achieve this goal, only authorized persons may speak to the media or other external parties on behalf of Nevro. External inquiries about Nevro should be directed to the appropriate management personnel.

Likewise, our use of social media should be responsible and appropriate. Social media posts about our products, sales, FDA submissions, or clinical data may only be posted by those authorized team members using only approved content. Team members should always be mindful of their affiliation with Nevro when posting or engaging on their personal social media accounts. Team members should avoid implying that Nevro endorses a personal business venture, political candidate, religious cause, or other product or service.

Q: Physicians often post on LinkedIn about their patient success stories. Is it okay to comment on the physician's post or should I only like it?

A: Generally, it's best to only "Like" a post. If you'd prefer to say more or provide a bit of detail, reach out the Marketing Department before making any comments.

Acting with Integrity in the Marketplace

Avoiding Insider Trading

We are committed to ensuring the safety of the patients and volunteers who take part in our clinical studies, and to upholding the highest ethical, scientific, and clinical standards in all of our research initiatives worldwide. All Nevro-sponsored clinical studies are designed and conducted in accordance with applicable laws, regulations, and recognized medical and ethical standards. Our policies are intended to ensure Nevro's respect for the health, wellbeing, and safety of research participants, as well as for the culture, laws, and regulations of the countries in which studies are conducted. Nevro recognizes the importance of making clinical study results available, and seeks to ensure that publications reporting on our sponsored research activities are accurate, objective, and contain appropriate disclosures.

Preventing Bribery and Corruption

Bribery and corruption can harm our communities, the marketplace, our patients, our customers, and Nevro's hard-earned reputation. We do not offer, give, or accept anything of value (or allow others to do so for us) in exchange for a favorable business decision or business advantage. We conduct business ethically and with integrity, deriving our success from hard work and the quality and value of our products.

Nevro does not tolerate the offer or acceptance of bribes. Bribes may take different forms but can consist of job offers; discounts; cash or cash equivalents, such as gift cards; meals or entertainment; gifts, however small; preferential status or contracting terms; or charitable contributions. The penalties for offering or accepting bribes or kickbacks can be severe and may include jail time and fines for both individuals and Nevro. Team members are expected to be familiar with and follow our policies and the law, including the U.S. Foreign Corrupt Practices Act, the U.K. Anti-Bribery law and other anti-corruption laws. Nevro can also be held responsible for the actions of third parties who conduct business on our behalf, so it is essential that we work with reputable third parties that share our commitment to honesty and integrity and ensure adequate oversight of their work.

Bribes may take different forms but can consist of job offers; discounts; cash or cash equivalents, such as gift cards; meals or entertainment; gifts, however small; preferential status or contracting terms; or charitable contributions.

Acting with Integrity in the Marketplace

Competing Fairly

At Nevro, we are committed to competing fairly, ethically, and lawfully, on the basis of our innovative, high-quality products and services. This includes respecting the rights of our competitors. Nevro obeys both the letter and the spirit of the antitrust, consumer protection, and other competition laws in the countries where we conduct business. These requirements are complex, and you should feel free to seek guidance from the Legal Department or the Chief Compliance Officer on how these laws may apply to your work on behalf of Nevro. In general, all team members must comply with the following:



Avoid discussing prices, sales terms, business plans, margins, costs, bids, production capacity, inventory levels, trade promotions, discounts, or other confidential information with competitors.



Never agree with competitors to fix prices; limit production or sales; or divide territories, customers, or suppliers.



Refrain from participating in practices that unreasonably restrict or inhibit competition or may be seen as an abuse of Nevro's market position.



Do not agree with other companies to boycott suppliers or customers.

Engaging in Charitable or Political Activities

Nevro is committed to being an active contributor to the greater good, including by giving back to our communities. We encourage team members to participate in and support charitable, educational, and philanthropic organizations. Any charitable activities that we engage in as a company, however, should be consistent with our corporate vision and mission.

Our support of charitable, educational, or philanthropic organizations and/or causes may never be contingent on or related to the recommendation, use, or purchase of Nevro's products or services. All charitable donations to a health care provider or at the request of a health care provider must follow applicable Nevro policy. Prior approval must be obtained in accordance with Nevro policy before contributing company funds, time, or other assets to a charitable or philanthropic organization.

Any public policy or political activities undertaken on behalf of Nevro – for example, use of company funds, time, or assets – must be consistent with the law and our Code, and preapproved by our Legal Department. When engaging in civic or political activities on a personal basis, team members must make it clear that any views expressed and actions taken are their own, not Nevro's.

Acting with Integrity in the Marketplace

Interacting with Government Officials

We must follow the same standards of ethical dealing with government entities that team members are expected to follow for all our customers, suppliers, and other relevant stakeholders. Government officials may include employees of federal, state, or local agencies; political candidates; and employees of national, state, or county-owned health care organizations. This means that physician in other countries outside the US, could be considered a government official and care should be taken to not to violate the many laws international laws about influencing officials. Importantly, while it is customary in some parts of the world to occasionally give gifts to customers and other parties that have a business relationship with our company, it is against Nevro policy to provide any gift to a foreign government official, or to a U.S. public official without prior approval of the Chief Compliance Officer.

It is Nevro's policy to cooperate fully with all government inspections, investigations, and other lawfully issued requests. In the event a team member receives a request for an inspection, subpoena, or notice of investigation, our Legal Department or our Chief Compliance Officer should be immediately notified so that we may respond in a timely manner. No matter what, we must never misstate, mischaracterize, or omit any material information when communicating with the government, and we must ensure that all records provided to government entities are accurate, complete, and timely.

Human Rights

Nevro understands its responsibilities as a global company to operate with the highest ethical standards and ensure that our team members and those that work with our suppliers and partners are treated fairly and equitably. Nevro has a series of measures in place to safeguard against the occurrence of human rights abuses, modern slavery and related human trafficking within our own organization and supply chain. See [Nevro's Statement on Human Rights](#).

Compliance with International Trade Laws

As a global company, Nevro recognizes the importance of adhering to applicable trade laws that govern the import and export of certain products, items, software and technology, services, and information. Team members who are involved in the movement of products, services, technology, software, information, or money across international borders on behalf of Nevro are expected to know and comply with all U.S. trade laws, as well as the laws and regulations of the countries in which we conduct operations.

In some cases, the countries in which we do business may have restrictions against exporting to other countries considered to be unfriendly or as supporting international terrorism. Nevro is committed to complying with any such controls on the destinations to which its products and services may be exported. The Legal Department will provide guidance to team members about any current trade restrictions applicable to their business functions.

Waivers and Amendments

Nevro expects team members to adhere to the Code. Waivers of any provision of the Code are rare. Waivers may only be granted in the following circumstances:

- For executive officers or directors, waivers may only be granted by Nevro's Board of Directors or a Committee of the Board and will be promptly disclosed to shareholders, as required by applicable laws and stock exchange regulations.
- For non-executive team members, waivers may be granted only by the Chief Compliance Officer, in consultation with the Legal Department. This Code may be amended or modified only by Nevro's General Counsel & Chief Compliance Officer.