

Code of Ethics and Business Conduct

Mission-Driven,
Patient-Centric,
Customer-Focused

CSI | CARDIOVASCULAR
SYSTEMS, INC.

enter >

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A MESSAGE FROM OUR CEO



Mission-driven, patient-centric, customer-focused. These are the characteristics that define our success. They describe how we can improve patient outcomes and help people get back to what matters. You are an integral part of our team and part of the journey we are on to live out our Mission: Saving Limbs. Saving Lives. Every Day. Each of us has a responsibility to be the best we can be

by making good business decisions, promoting an ethical culture and working to earn and maintain the trust of those we serve.

Our Code of Ethics and Business Conduct is designed to help you understand CSI's Core Values and the ethical and legal standards by which we must conduct our business. We have designed the Code to help put our Mission into practice.

Consider this your guide to doing the right thing and preserving the reputation we have earned by conducting our business with integrity and transparency.

Please read this Code carefully and refer to it often. It covers ethical situations you could face at work and points you to policies and additional resources for help. I encourage you to ask questions if something in the Code is not clear and speak up if you see or suspect conduct that violates our Code, our policies or the law.

Thank you for your commitment to fulfilling our Mission. Your contributions propel our community forward in a collective effort to serve our patients. Together, we will continue to lead the way by Saving Limbs, Saving Lives, Every Day.

A handwritten signature in blue ink, which appears to read "Scott R. Ward". The signature is fluid and cursive, with a large loop at the end.

Scott R. Ward

Chairman, President and Chief Executive Officer

WE LIVE OUR MISSION AND CORE VALUES

OUR MISSION

SAVING LIMBS. SAVING LIVES. EVERY DAY.

Cardiovascular Systems, Inc. and its subsidiaries (“CSI” or “Company”) is leading the way in the effort to develop interventional treatment options for patients suffering from peripheral and coronary artery diseases. CSI develops and commercializes innovative solutions that help achieve our Mission of Saving Limbs, Saving Lives, Every Day when facing these difficult-to-treat disease states. We are committed to setting the industry standard by delivering safe and effective products and services that help improve patient outcomes.

OUR VISION

We seek to treat the symptoms of cardiovascular disease as a barrier to living a full life by providing awareness, education and innovation.

OUR CORE VALUES

Who we are at CSI, and what we strive for together, is embodied in our Core Values of:



ACCOUNTABILITY



COMMUNITY



COURAGE



EXCELLENCE



INTEGRITY



VELOCITY

These Core Values must guide the work we do every day and be used in our decision-making. By following our Core Values, we show our dedication to the Mission, the CSI community and to the patients we serve.

WE HONOR OUR CODE

IN THIS SECTION:

Purpose and Overview

Making Good Decisions

What We Expect of You

What We Expect of Managers

Asking Questions and
Reporting Concerns

Disclosures and Waivers

Coordination with Other Policies



PURPOSE AND OVERVIEW

Our Code of Ethics and Business Conduct ("Code") reflects who we are as a Company and provides the information you need to live out our Mission and Core Values in everyday situations. This is important because we operate in a challenging business environment in which there may be situations where the path is unclear. When you refer to and follow the Code, you are creating an environment where we can do our best work and positively impact patients' lives.

WITHIN OUR CODE, YOU WILL FIND:

- > Overviews of important topics
- > Decision-making tools
- > Examples of our Core Values in action
- > Where to find additional policies and resources

You are part of a company that is committed to the highest quality in everything we do – whether it is the products, services or relationships we establish. We set the standard when it comes to safe and effective medical devices that improve patient outcomes. By honoring our Code, you will be providing the millions of people affected by arterial disease an opportunity to get back to what matters most.

WHO MUST FOLLOW THE CODE?

Our Code applies to everyone who works at CSI or on our behalf. That includes full-time and part-time employees in all our locations, as well as any officer, Board member, consultant, contractor, vendor, supplier, distributor, sales agent, business partner or other third party whose work may reflect on CSI.

WHAT IF OUR CODE IS VIOLATED?

If you violate our Code, you violate our Core Values, policies and potentially the law, so we take each violation seriously. Whether you are in direct violation, pressuring someone else to violate our Code or failing to report misconduct, the consequences can be severe. Depending on the violation, disciplinary action may take many forms, up to and including termination of employment and even referral of the matter to the proper authorities.

MAKING GOOD DECISIONS

WHEN YOU FIND YOURSELF IN A SITUATION WHERE THE RIGHT THING TO DO IS NOT CLEAR, PAUSE BEFORE YOU TAKE ACTION AND ASK YOURSELF:

- > Is this legal?
- > Is it in line with our policies?
- > Is it consistent with our Mission and Core Values?
- > Is it in the best interest of our Company, patients and other stakeholders?
- > Does this conduct reflect well on my reputation and the Company's reputation?

If you answer "yes" to every question, then it is probably OK to proceed. If you answer "no" or "I'm not sure" to any of them, take a step back to consider your actions and ask for help before moving forward.

WHAT WE EXPECT OF YOU

EACH OF US MUST ADHERE TO THIS CODE AND BE RESPONSIBLE FOR:

- > Understanding and following our Code, our Core Values, our policies and the law.
- > Modeling professional and ethical behavior.
- > Speaking up if you see or suspect a violation of our Code, our Core Values, our policies or the law.
- > Raising questions if you are unsure of the right course of action or our policies are unclear.

WHAT WE EXPECT OF MANAGERS

IF YOU ARE A MANAGER, WE EXPECT YOU TO:

- > Lead with integrity and be a positive role model for your team.
- > Recognize and reward ethical or other behaviors that model our Core Values.
- > Encourage your team to read our Code and policies and refer to them often.
- > Know our Code and policies well enough to answer questions from your team.
- > Maintain an open-door policy so your team can come to you for help.
- > Create an environment where everyone is comfortable speaking up without fear of retaliation.
- > Take any concern raised by your team seriously and escalate it as needed.
- > Take appropriate disciplinary action when needed.
- > Refrain from and report potential retaliation or any activity that violates our Code, our Core Values, our policies or the law.

ASKING QUESTIONS AND REPORTING CONCERNS

It is up to each of us to report concerns when we think misconduct may be happening or ask questions if unsure. If you believe someone is violating our Code, our Core Values, our policies or the law, speak up immediately. Speaking up in good faith is the best way to protect our patients, our Company and its reputation, and our colleagues. Each reported instance of misconduct will be reviewed and, if warranted, investigated promptly and fully. We are all obligated to cooperate with any such investigation.

HOW DO I SPEAK UP?

You can always speak with your manager or someone in Human Resources ("HR"), Legal or Compliance about your concerns or if you have questions about a situation. Your concerns will remain confidential to the extent possible.

If you do not feel comfortable speaking to someone directly, you may contact our Compliance Hotline to make a confidential report. This resource is available to you 24 hours a day, 7 days a week.

NON-RETALIATION POLICY

It is against our policy to retaliate against anyone who raises concerns or questions regarding a potential violation of this Code, our Core Values, our policies or the law that he or she reasonably believes to have occurred. If you feel you have been retaliated against for raising your good faith concerns or questions, immediately contact your manager or someone in HR, Legal or Compliance or the Compliance Hotline.

SHARE YOUR CONCERNS BY CONTACTING:



[The Compliance Hotline](#)
1-877-344-2714



[The Compliance Officer](#)
651-202-4870

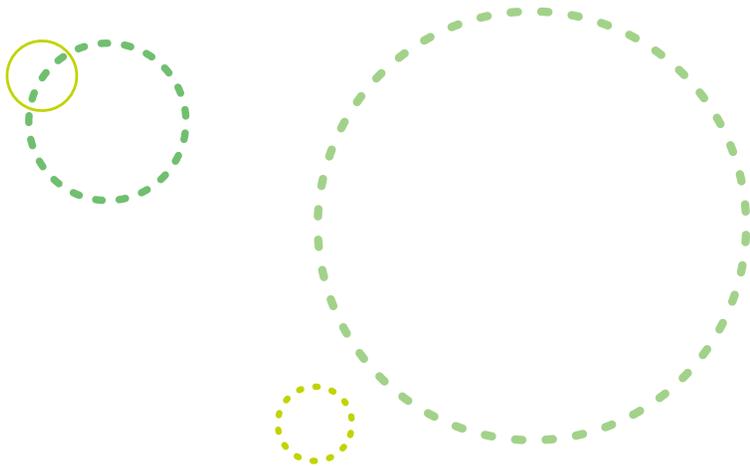


[The Chairman of the Audit, Risk Management and Finance Committee](#)
651-259-2880

If you contact the Compliance Hotline, which is operated by an independent third party, you will be able to voice your concern while having the option to remain anonymous or provide your name. If you elect to remain anonymous, the Company will only receive a written transcript of the information you provide. At the time you contact the Compliance Hotline you will also be given a case number and a PIN that allows you to use the hotline provider's case management system. That case management system allows you to provide additional information in the future if desired and for us to request additional information and provide status updates on your concern.

DISCLOSURES AND WAIVERS

This Code is available on CSI's website. It is expected that waivers of this Code rarely, if ever, would be made. Any waiver of a provision of this Code for an executive officer or director may be granted only by the Board of Directors, with only the independent members voting, and such waiver must be promptly disclosed in accordance with SEC rules. Any waiver of a provision of this Code for non-executive officers may be granted by the Chief Executive Officer and the Compliance Officer, and any waiver of a provision of this Code for other employees may be granted by the Compliance Officer, and any such waivers will be reported to the Audit, Risk Management and Finance Committee of the Board of Directors.



COORDINATION WITH OTHER POLICIES

The provisions of this Code are in addition to, and do not modify, replace or supersede CSI's other policies or procedures, whether written or oral.

Additionally, this Code is not intended to be and does not constitute a contract of employment between CSI and its employees. If you are an employee of CSI, you are employed on an at-will basis, unless you have a contractual agreement with CSI that provides otherwise. This means that you have the option of resigning from your employment at any time, with or without cause, and with or without prior notice. Conversely, CSI has the same option to terminate your employment at any time, with or without cause, and with or without prior notice.



WE PROMOTE A RESPECTFUL WORKPLACE

IN THIS SECTION:

- Promoting Diversity and Inclusion
- Promoting a Harassment-Free CSI
- Maintaining Workplace Health and Safety
- Preventing Violence and Substance Abuse



PROMOTING DIVERSITY AND INCLUSION

We take pride in our diverse team and we celebrate the unique talents, experiences and perspectives we each bring to CSI. Having a richly diverse workforce also allows us to better serve a diversity of patients and customers.

WE EACH HAVE A RESPONSIBILITY TO ...

Respect and value differences.

Recognize the benefits that diversity and inclusion provide and commit to inclusive behaviors and treatment in all aspects of our work. Be inclusive and seek to understand others' perspectives and opinions and treat each other with dignity and respect.

Do not discriminate against any individual based on characteristics protected by law, including age, citizenship status, color, disability, gender, gender identity and/or expression, marital status, medical condition, national origin, pregnancy, race, ethnicity, nationality, religion, sexual orientation, genetic information, veteran status or other protected class status under applicable law. Never base employment-related decisions on one of these characteristics. Instead use relevant factors like performance, qualifications, individual merit and skills.

CORE VALUE IN ACTION COMMUNITY



I can help create a community of collaboration and find new solutions by actively valuing everyone's different perspectives, even if I might not fully agree with all of those perspectives.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I applied for a position with another team but learned it was offered to a less-qualified person. I think the reason was because the hiring manager wanted someone younger. What should I do?
- A** If you suspect you were discriminated against based on a protected characteristic, speak with someone in HR, Legal or Compliance as soon as possible. We require that all employment decisions be based on legitimate, non-discriminatory criteria.

FIND OUT MORE >>>

- Sexual Harassment and Discrimination Policy (POL-0017)
- Employee Accommodation Policy (POL-0030)

PROMOTING A HARASSMENT-FREE CSI

When we treat everyone with dignity and respect, we are all motivated to do and be our very best. We must value the contributions of every team member by working together to promote a welcoming environment that is free of harassment, abusive conduct and bullying.

WE EACH HAVE A RESPONSIBILITY TO ...

Support and respect each other and speak up when needed.

Keep our workplace positive and productive. Use care in your interactions, never act in a harassing or abusive manner and speak up if you see or suspect harassment or bullying by others. These expectations apply to all settings in which we do work on behalf of CSI and apply not only to you and your team members but also to customers and anyone we interact with as part of our work for CSI.

EXAMPLES OF UNACCEPTABLE BEHAVIOR INCLUDE:

- > Sexual harassment, such as sexual advances, requests for sexual favors, touching of a sexual nature, posting of sexual materials, threatening or continuing to make sexual advances, inappropriate verbal or physical conduct and other acts of a sexual nature.
- > Verbal harassment, such as demeaning or derogatory jokes, racial slurs, threats, name-calling or crude remarks.
- > Physical harassment, such as pushing or shoving, brushing against another's body or other unwanted physical advances.
- > Visual harassment, such as offensive cartoons, offensive emails, graphic drawings or pictures, foul or obscene stares or gestures.

Harassment, sexual or otherwise, is defined by your actions, not your intentions. What is the best way to ensure you are promoting a harassment-free CSI? Follow our policies and ask questions anytime you are unsure about the right course of action.

CORE VALUE IN ACTION COURAGE



I noticed that a coworker on my team was constantly demeaning and bullying another coworker. I reported the situation to HR, because I knew it was the right thing to do even though I was afraid to do it.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q I overheard a manager making sexually explicit jokes in the cafeteria. They made me uncomfortable, but I don't know if anyone else felt that way. What should I do?
- A Please report this incident as soon as possible. It doesn't matter whether coworkers found it offensive or not. Telling sex-based jokes to coworkers, or others with whom we work, is inappropriate and is not tolerated.

FIND OUT MORE

Sexual Harassment and Discrimination Policy (POL-0017)

MAINTAINING WORKPLACE HEALTH AND SAFETY

Keeping each other safe on the job is a responsibility we all share. When we each comply with health and safety requirements, use common sense and speak up about hazardous situations, we are doing our part to ensure everyone returns home safe. Regardless of the job we do or where we do it, we never compromise when it comes to safety in all our facilities and operations.

WE EACH HAVE A RESPONSIBILITY TO ...

Put health and safety first.

Stay alert and follow safety policies, regulations and laws in order to protect yourself, your coworkers and our facilities. Keep your work area free from obstacles and hazards. Situations that pose a health or safety risk should be reported immediately.

WHAT ELSE CAN YOU DO TO PROMOTE A SAFE AND HEALTHY CSI?



Wear personal protective equipment, when required.



Complete all required safety training.



Comply with safety and pandemic protocols.



Report work-related injuries or illnesses, broken equipment or property damage right away.



Speak with your safety representative to make suggestions on how to improve safety.

This is not an exhaustive list, so use good judgment and speak with your manager or someone in HR, Legal or Compliance if you have any questions.

PREVENTING VIOLENCE AND SUBSTANCE ABUSE

Your safety and wellness are our highest priorities. We keep our workplace free from weapons, violence and do not tolerate anyone working under the influence of any substance that could impair their job performance or pose a safety hazard. Do your part by remaining alert to what is going on around you, observing good security practices and speaking up about any threats or concerns. In doing so, you will help ensure your own security and the security of those around you.

WE EACH HAVE A RESPONSIBILITY TO ...

Observe a zero-tolerance policy for violence and substance impairment.

If you need help with a substance-related matter, or suspect a colleague is working under the influence of a substance that could impair his job performance or pose a safety hazard, speak with your manager or someone in HR, Legal or Compliance right away.

Weapons are prohibited on Company property or while conducting Company business unless permitted under local law (e.g., in the case of security personnel and law enforcement). We do not tolerate any type of workplace violence threatened or committed by or against CSI employees. If you experience, witness or learn of any violent behavior or threat, or fear violent behavior, immediately contact your manager, HR or local authorities.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I was recently prescribed a medication that has the potential to make me drowsy at work. It's not as if I would be working under the influence of an illicit drug. Do I need to say anything?
- A** We would encourage you to discuss this matter with your manager or someone in HR, Legal or Compliance to determine if a plan is needed to ensure you don't put yourself or others at risk.

FIND OUT **MORE**

Drug and Alcohol-Free Workplace Policy (POL-0027)

Violence-Free Workplace Policy (POL-0028)

WE SAFEGUARD OUR COMPANY

IN THIS SECTION:

Protecting Physical, Financial
and Electronic Assets

Protecting Confidential and
Personal Information

Protecting Intellectual Property

Avoiding Conflicts of Interest

Knowing the Rules about Gifts
and Entertainment

Speaking on Behalf of CSI

Using Social Media



PROTECTING PHYSICAL, FINANCIAL AND ELECTRONIC ASSETS

Protecting our physical, financial and electronic assets gives us a competitive advantage and enables us to do the work necessary to fulfill our Mission. When we handle these assets with care and use them responsibly, we preserve the tools and resources needed to continue to provide the highest quality products and services to our patients and customers.

WE EACH HAVE A RESPONSIBILITY TO ...

Protect our Company's physical, financial and electronic assets.

Only use assets for their intended purposes and in accordance with our policies. Do your part to prevent damage, loss and improper use of all forms of Company assets.

WHAT ARE PHYSICAL, FINANCIAL AND ELECTRONIC ASSETS?



Physical assets are material items of value, such as properties, buildings, office furnishings, equipment, production materials, inventory, office supplies, phones and computers.



Financial assets are non-physical items of value, such as bank deposits, bonds, stocks, cash equivalents and equity instruments.



Electronic assets are items accessed or stored in electronic form, such as our network, email and internet access, files and data, databases and mobile and desktop software.

Keep our electronic resources and systems safe, and practice good cybersecurity. Follow our policies and training to avoid phishing, malware, ransomware and other forms of attack. If your device is lost or stolen, or if you suspect a data breach, report it immediately. Always use your good judgment to protect Company assets from damage or inappropriate use.

CORE VALUE IN ACTION ACCOUNTABILITY

I make sure that I complete our Company security trainings and follow guidance on safeguarding information. If I'm not sure about something, like an email, I'll report it to IT to be safe.

EVERY PERSON. EVERY DECISION. EVERY DAY.

-  **Q** Our IT department provides anti-virus protection so that should protect me if I click on a link in an email from an unknown sender, right?
-  **A** No. No matter how strong our systematic defenses are, you must be wary of attachments and links. Even anti-virus protection can't protect us from certain online attacks.

FIND OUT MORE

Technology Acceptable Use Policy (POL-0005)

PROTECTING CONFIDENTIAL AND PERSONAL INFORMATION

Confidential Company and personal information is critical to how we do business. If placed in the wrong hands or used for the wrong purpose, it can compromise our competitive advantage in the marketplace. It can also breach the privacy of those who trust us to protect their personal information.

Not sure if information you are handling is confidential or personal? Ask Compliance or Legal for guidance, and until you know for sure, treat it as though it is. Nothing in this Code or in any agreement with CSI is intended to prohibit CSI employees or others from reporting possible violations of law or regulation to any governmental agency or entity or making other disclosures that are protected under the whistleblower provisions of applicable law or regulation.

WE EACH HAVE A RESPONSIBILITY TO ...

Safeguard confidential and personal information.

Only use confidential or personal information for legitimate business purposes and protect it from unauthorized use or disclosure. Keep it secure, whether the information belongs to us or a third party, such as a customer, supplier or patient. Honor all confidentiality agreements and never acquire protected personal information unless there is a specific business need for it, such as reporting a quality issue.

Data created and referenced on CSI networks and devices is considered property of CSI and should be treated and handled as confidential Company information, unless otherwise noted. Follow CSI policies related to labeling, handling, storage and disposal of confidential and personal information.

WHAT IS "CONFIDENTIAL" OR "PERSONAL" INFORMATION? IT MAY INCLUDE BUT IS NOT LIMITED TO:

- > Information about our Company, such as business plans, marketing strategies, customer lists, financial information and trade secrets.
- > Information about people, such as coworkers' salary and benefit information and customers' account data and credit card information.
- > Information about customers and patients, which is highly sensitive – see [Interacting with Patients and Customers](#) for more information.
- > Information we receive from current, former and prospective business partners under confidentiality agreements with them.
- > Information that can be used, alone or in combination with other information, to identify a specific individual or patient, such as a person's name, picture, address, email, date of birth, patient ID, driver's license number, social security number or other government identifiers.

FIND OUT 
MORE

[Technology Acceptable Use Policy \(POL-0005\)](#)

[Insider Trading Policy \(POL-0006\)](#)

[CSI Global Privacy Policy \(POL-0048\)](#)

PROTECTING INTELLECTUAL PROPERTY

The creative works and original thought resulting from the work done on behalf of the Company is our intellectual property ("IP") and gives us the competitive advantage we need to better serve customers and help patients. In protecting our IP, we ensure that we have the resources we need to be successful in the competitive market in which we operate.

WE EACH HAVE A RESPONSIBILITY TO ...

Handle IP appropriately and discreetly.

Use IP solely for business purposes and never disclose confidential IP to anyone (whether a CSI employee or a third party) who does not need it to do their job on behalf of CSI. Safeguard our IP and that of our licensors from misuse, theft, fraud and loss by being mindful of where, how and with whom it is discussed.

All IP created during and within the scope of your employment with CSI belongs to CSI. We also must take care not to infringe on the patents, trademarks and similar rights held by any third party.

WHAT ARE SOME EXAMPLES OF IP?

- > Patents
- > Technical data
- > Trade names and trademarks
- > Trade secrets
- > Copyrights
- > Business methodologies
- > Marketing strategies

This list alone is not exhaustive. IP is a broad category that covers our whole knowledge base, including brands, creative works and original ideas for a product or process. If you have any questions about whether our IP rights are being violated, or if you are concerned that we may be violating the IP rights of others, speak to your manager or someone in HR, Legal or Compliance immediately.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I worked for another medical device company before coming to CSI. I'm looking forward to applying my expertise and sharing some processes and methods we used that could really advance our CSI products. Who should I talk to about this?
- A** You should discuss this matter with your manager or someone in HR, Legal or Compliance. If this information is considered confidential by your former employer, you must not share it with CSI. You have an obligation to keep that information confidential. And if you should leave CSI, you must not share our confidential information with your new employer.

FIND OUT 
MORE

Technology Acceptable Use Policy
(POL-0005)

AVOIDING CONFLICTS OF INTEREST

Conflicts of interest may affect our objectivity in making business decisions on behalf of our Company. We should never allow personal interests or relationships, or any other kind of situations that may present (or appear to present) a conflict of interest to jeopardize the integrity of our Company's work. To do so may reflect negatively on CSI and inhibit our ability to fulfill our Mission.

WE EACH HAVE A RESPONSIBILITY TO ...

Act in CSI's best interests.

Avoid conflicts of interest (or the appearance of conflicts of interest) and never use your position, contacts, access to confidential information or knowledge about the Company for personal gain. Disclose any potential conflicts of interest as required by CSI policies.

WHAT ARE SOME EXAMPLES OF "CONFLICTS OF INTEREST"?



Personal relationships, such as supervising a family member or someone with whom you have a romantic relationship, allowing a friend to receive improper personal benefits because of your position, or transacting business on CSI's behalf with a family member or someone with whom you have a romantic relationship.



Outside activities, such as employment with a competitor, supplier or customer.



Financial interests, such as certain investments in a competitor, supplier or customer.



Business opportunities, such as certain investments in a competitor.

Spotting a conflict of interest is not always obvious and this list alone is not exhaustive. If you find that you need additional guidance, speak with your manager or someone in HR, Legal or Compliance immediately.

CORE VALUE IN ACTION ACCOUNTABILITY

I spoke up about a potential conflict of interest between me and a physician because I didn't want the relationship to influence any purchasing decisions. By doing so, I helped CSI's reputation and I took responsibility for my actions.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** My friend owns a small business that supplies consultation services we are currently bidding out. May I suggest her company as a possible vendor?
- A** Yes, if you disclose your relationship to her company to your manager or someone in HR, Legal or Compliance. You should also recuse yourself from the procurement process to avoid any appearance of bias.

FIND OUT MORE

- Relationships at Work (POL-0020)
- Conflicts of Interest Policy (POL-0036)

KNOWING THE RULES ABOUT GIFTS AND ENTERTAINMENT

Exchanging gifts, entertainment and hospitality with customers and vendors to foster business relationships is generally prohibited in the highly regulated healthcare industry in which we operate. To protect our Company, we have policies in place that limit or prohibit the giving of gifts, entertainment or hospitality with third parties, such as vendors or physicians and other customers. We need to make sure anything given to or received from a third party complies with our policies and never affects our or the other party's objectivity in making business decisions. Remember that fostering great long-term business relationships starts by establishing trust and doing the right thing for our patients, not by giving or receiving gifts, entertainment or hospitality.

WE EACH HAVE A RESPONSIBILITY TO ...

Follow our gifts and entertainment policies.

Only offer or accept something of value when doing so would be considered legal, ethical, reasonable and consistent with our policies. It is not always obvious if an offer is acceptable or not, so make sure you know our policies and those of our suppliers, business partners and customers to stay within the bounds of what is acceptable.

WHAT KINDS OF GIFTS TO THIRD PARTIES ARE "INAPPROPRIATE"?

- > Cash in any amount, including loans.
- > Cash equivalents, such as gift cards.
- > Anything that creates an obligation in return.
- > Anything given to win favors or make a sale.
- > Anything considered excessive by a reasonable standard.

Other gifts that may be considered inappropriate include anything offered to or accepted from a healthcare professional or government official. There are significant legal restrictions when it comes to healthcare professionals and government officials, so we have adopted a zero gifts policy approach in most countries. See [Interacting with Government Officials](#) and [Preventing Bribery and Corruption](#) for more details.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** A supplier gave me a small box of candies with her company's logo on it. Is that considered appropriate?
- A** Yes, it's generally acceptable to exchange promotional items of nominal value with a supplier but be careful and notify your manager or Compliance. Any gift – even one nominal in value – may create actual or potential conflict of interest so ensure you understand our policies and ask questions.

FIND OUT MORE

Interactions with Healthcare Professionals (POL-0002)

Expense Reimbursement and Corporate Travel and Entertainment Policy (POL-0004)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

Conflicts of Interest Policy (POL-0036)

SPEAKING ON BEHALF OF CSI

What we communicate about CSI has an impact on our reputation, success and brand. Designating certain spokespeople to communicate on our behalf helps ensure that the information about CSI is reliable, consistent, accurate and in accordance with all applicable laws and Company policies.

WE EACH HAVE A RESPONSIBILITY TO ...

Protect CSI's reputation.

Communicate responsibly and with one voice. Refrain from speaking on CSI's behalf unless you are authorized to do so and, if you are ever contacted by the media, refer them to our Investor Relations and Corporate Communications Department.

CORE VALUE IN ACTION VELOCITY

When I am aligned with my colleagues on our Company's messaging it shows that CSI executes efficiently and in a common direction.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I was invited to participate in a speaking engagement on behalf of CSI. What should I do?
- A** There are many fantastic public speaking opportunities that could benefit both you and our Company. However, seek approval from your manager or someone in HR, Legal or Compliance first. We want to ensure the right messaging is communicated.

USING SOCIAL MEDIA

Social media is a great way to communicate, deepen engagement, build relationships and exchange ideas, but only when used responsibly. When posting about work-related matters, be transparent about your relationship with CSI, use good judgment and be honest and ethical.

WE EACH HAVE A RESPONSIBILITY TO ...

Use social media in a way that is consistent with our Core Values, our policies and the law.

Follow our policies when posting on social media, and always check with the owner before posting someone else's work.

Disclose your relationship to CSI when posting online about the Company. If you are unsure of how to do this properly, speak with your manager or someone in HR, Legal or Compliance.

We have zero tolerance for cyberbullying and the use of social media to intimidate, harass or discriminate against coworkers. Never use ethnic slurs, personal insults, obscenity or engage in any conduct that would not be acceptable in our workplace. Any information you post online or send by email or text should be considered permanent.

We comply with laws that protect the rights of employees to speak publicly about matters of public concern and engage in protected concerted activities. Our Code and policies do not or should not be construed to interfere with or limit your legal rights.

FIND OUT >>>
MORE

Technology Acceptable Use Policy (POL-0005)

WE UNDERSTAND OUR RESPONSIBILITIES TO OTHERS

IN THIS SECTION:

Complying with Laws and Regulations

Interacting with:

- Healthcare Professionals
- Patients and Customers
- Suppliers and Vendors
- Government Officials

Guarding Against Fraud, Waste
and Abuse

Ensuring Integrity in Marketing
and Advertising

Promoting Product Safety
and Quality

Conducting Clinical Research



COMPLYING WITH LAWS AND REGULATIONS

We have worked hard to build a reputation of trust and reliability in a highly regulated industry. We comply with all applicable laws and regulations pertaining to our business and industry in all countries of the world in which we operate in order to maintain our reputation. Failing to comply would have serious consequences not only for our Company, but also for the health of the patients who depend on us.

WE EACH HAVE A RESPONSIBILITY TO ...

Follow the laws and regulations that apply to our jobs and our Company.

Comply with the policies and requirements that apply to your individual job and the location in which you work. Violating applicable laws and regulations could expose CSI and you to legal liability, fines and other penalties.

EXAMPLES OF THE LAWS AND REGULATIONS TO UPHOLD INCLUDE:

- > The Federal Food, Drug and Cosmetic Act and foreign equivalents
- > The Health Insurance Portability and Accountability Act and foreign equivalents
- > The Federal Anti-Kickback Statute
- > The Physician Payments Sunshine Act and foreign equivalents
- > U.S. Foreign Corrupt Practices Act and foreign equivalents
- > Insider trading laws

CSI policies are also aligned with certain industry guidelines like the AdvaMed Code of Ethics on Interactions with Healthcare Professionals. If you become aware of possible violations of any laws, including any of those listed, or one of our policies, speak up, and ensure that you cooperate with any internal investigations, audits or reviews.

CORE VALUE IN ACTION EXCELLENCE

I know that putting in the extra effort to make sure we do things right the first time goes a long way. It fosters better long-term value for our patients, customers and business because we can focus on fully living out our Mission.

FIND OUT MORE

Interactions with Healthcare Professionals (POL-0002)

Insider Trading Policy (POL-0006)

Sunshine Act (Open Payments) Policy (POL-0007)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

Export Control Compliance Policy (POL-0016)

CSI Global Privacy Policy (POL-0048)

INTERACTING WITH HEALTHCARE PROFESSIONALS

Observing good business practices when interacting with healthcare professionals (“HCPs”) and healthcare institutions (“HCIs”) demonstrates our commitment to our Mission. By avoiding interactions that may present a conflict of interest or interfere with an HCP’s or HCI’s independent medical judgment, we empower HCPs to make informed decisions that are in the best interest of their patients.

WE EACH HAVE A RESPONSIBILITY TO ...

Never compromise the relationship between patients and their HCP.

Make sure every interaction you have is professional, serves a legitimate business purpose and advances the interests of the patients that we serve.

WHAT ELSE CAN YOU DO?



Ensure that HCPs and HCIs have the latest, most accurate information available about our products and clinical studies.



Never interfere with an HCP’s independent medical judgment.



Never offer or give anything of value to influence a business decision or make a sale.



Avoid situations that may present a conflict of interest.



Promote our products only for their approved or cleared indications for use.

CORE VALUE IN ACTION COURAGE



I don’t let my personal interests or relationships interfere with the medical judgment of our customers. That means I speak up and educate a physician on appropriate patient selection for our devices, even if it results in the use of a competitor’s product.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- D** I recently discussed our products with an HCP who is deciding whether to purchase a device. She mentioned a charity that she oversees and its incredible mission. I would love to help. May I donate?
- A** No. Even with the best of intentions, your donation could give the appearance of trying to influence the HCP’s judgment. Try to find another charity or way to support the mission you’ve taken an interest in.

FIND OUT MORE >>>

Interactions with Healthcare Professionals (POL-0002)

Sunshine Act (Open Payments) Policy (POL-0007)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

INTERACTING WITH PATIENTS AND CUSTOMERS

We have an obligation every day to treat others the way we want to be treated. We do that by committing ourselves to protecting patient and customer privacy, maintaining our professional credentials and providing superior customer service in every interaction.

WE EACH HAVE A RESPONSIBILITY TO ...

Treat our patients and customers honestly, fairly and with respect.

Respect personal information and maintain the privacy of personal information, such as information that could be used to identify a patient. Collect the minimum personal information needed to perform your job and use it for legitimate business purposes only.

Maintain all required licenses, vendor credentials and certifications. Notify your manager or someone in HR of any adverse changes in your license, vendor credentials or certification status.

Provide superior customer service by putting patients first. Comply with our policies and any regulatory or contractual requirements, and in every interaction be patient, attentive and professional.

CORE VALUE IN ACTION **ACCOUNTABILITY**

If I see anyone mishandling personal information I immediately speak up. If I express my concerns and am proactive, I protect the privacy of our patients and CSI's integrity.

FIND OUT **MORE**

Interactions with Healthcare Professionals (POL-0002)

CSI Global Privacy Policy (POL-0048)

INTERACTING WITH SUPPLIERS AND VENDORS

We select business partners solely based on their ability to meet our business needs – not based on personal relationships. We value our partnerships with vendors and suppliers and are committed to working with them in a transparent manner, free from conflicts of interest, and consistent with all applicable laws and good business practices.

WE EACH HAVE A RESPONSIBILITY TO ...

Choose suppliers and vendors that best serve our business needs.

Select a supplier or vendor based on objective criteria, such as quality, service, price, delivery and experience.

Encourage our suppliers and vendors to act consistently with their contractual requirements and industry best practices, and monitor their performance to make sure they are meeting their obligations. Ensure the suppliers you select honor our Code, our Core Values, our policies and the law.

NEVER ACCEPT:



Personal gifts of more than nominal value without approval from your manager or someone in HR, Legal or Compliance.



Rebates or discounts on personal purchases.



Kickbacks or bribes.



Anything that could interfere – or could be perceived by others to interfere – with your objective decision-making.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** One of our suppliers offered me a special rebate if I purchase something from her company for my personal use after I selected them as a supplier to CSI. May I?
- A** No. Rebates given to you on purchases for personal use are considered inappropriate, so you should refuse unless the supplier offered the discount to everyone at CSI.

INTERACTING WITH GOVERNMENT OFFICIALS

Our relationships with government officials, representatives, customers and agencies are governed by a unique set of requirements and laws. We uphold these requirements and laws based on our commitment to honesty, transparency and integrity in all our Company's business operations.

WE EACH HAVE A RESPONSIBILITY TO ...

Cooperate and communicate with integrity.

As a government contractor, we have an obligation to comply with the procurement laws and regulations that apply to that work. If you work with government customers, you are responsible for understanding the unique legal requirements and restrictions associated with that customer and to protect any government property or classified information entrusted to you.

Be aware that some physicians may also be government officials or representatives by virtue of their employment relationship. Communicate lawfully and ethically and in ways that advance the interests of patients. Never give anything of value to government personnel (physician or otherwise) or extend invitations for meals or entertainment except as permitted by our policies and the law. For more information about interacting with physicians who are government employees, see [Interacting with Healthcare Professionals](#).

If you are contacted by a government representative regarding an audit, investigation or inspection, be cooperative but **immediately contact** your manager or someone in HR, Legal or Compliance to determine how to proceed. Make sure all representations, reports, data and other statements that you submit on CSI's behalf are accurate and truthful and that you never conceal, destroy or alter documents connected to an audit, investigation or inspection. Also, never interfere with a government audit, inspection or investigation.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** The holidays are coming up. Would it be OK to send out seasonal cards to my government colleagues?
- A** This may be OK but seek guidance first. Even this type of activity must be monitored closely to ensure strict compliance with the law.

**FIND OUT
MORE** >>>>

Interactions with Healthcare Professionals (POL-0002)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

Export Control Compliance Policy (POL-0016)

GUARDING AGAINST FRAUD, WASTE AND ABUSE

We are committed to transparency and accountability in healthcare because they are fundamental to maintaining the public's trust in the healthcare industry. We are committed to maintaining trust and will not compromise the relationship between a healthcare provider and a patient.

WE EACH HAVE A RESPONSIBILITY TO ...

Make sure all claims submitted to public and private healthcare providers are accurate and prevent fraud, waste and abuse.

MAKE SURE YOU COMPLETE ALL REQUIRED TRAINING AND KNOW THE DEFINITIONS OF FRAUD, WASTE AND ABUSE:

- > Fraud includes illegally obtaining money from someone through deception or misrepresentation.
- > Waste is the overuse of services or practices that results in unnecessary costs.
- > Abuse covers practices that are inconsistent with sound fiscal business or medical practices.

WATCH FOR AND SPEAK UP ABOUT ACTIVITIES THAT COULD CONSTITUTE FRAUD, WASTE AND ABUSE, SUCH AS:

- > Billing for services, procedures or supplies that have not actually been provided.
- > Providing services to patients that are not medically necessary.
- > Altering a diagnosis to receive payment.
- > A lack of supporting documentation where it is required.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q One of the physicians we work with uses our products even when they aren't medically necessary. What should I do?
- A You should report what you know immediately. Claims for services or products that aren't medically necessary is a form of waste and abuse and should not be tolerated.

FIND OUT MORE

Interactions with Healthcare Professionals (POL-0002)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

ENSURING INTEGRITY IN MARKETING AND ADVERTISING

Integrity in marketing and advertising helps us tell our story, highlights the benefits of our products and identifies any risks associated with their use. We comply with all applicable federal and state regulatory standards in our marketing and advertising practices.

WE EACH HAVE A RESPONSIBILITY TO ...

Provide accurate, fair and balanced information.

DO YOUR PART TO SEND THE RIGHT MESSAGE:

-  Fact-check and verify any claims.
-  Make sure any written or visual depictions accurately reflect the products we offer.
-  Make sure our products are promoted only for uses approved or cleared by the FDA or other applicable regulatory body in the country where the products are sold.
-  Insist on accuracy – never mischaracterize or mislead.
-  Make sure all ads and promotional materials are reviewed before their use through our internal approval process.

CORE VALUE IN ACTION EXCELLENCE

Patients depend on our life-changing products. That means I need to ensure our customers have the best and most accurate information about them.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I am putting together promotional materials and I want to highlight a use of one of our new products that is truthful, but not yet approved by the FDA. Would that be OK?
- A** No. Present your materials in a way that promotes already approved uses of the product and follow all internal procedures relating to review and approval of promotional materials. Once we receive FDA approval, you may update your materials accordingly and in accordance with the applicable internal procedures.

FIND OUT MORE

Interactions with Healthcare Professionals (POL-0002)

PROMOTING PRODUCT SAFETY AND QUALITY

There can be serious consequences if a product does not meet our high standards or, even worse, is unsafe. That is why we dedicate ourselves to excellence at every phase of our business operations. We follow stringent safety and quality control standards and monitor our products to make sure they function as they were designed to operate.

WE EACH HAVE A RESPONSIBILITY TO ...

Deliver a safe, quality product, every time.

Never sacrifice quality to meet a Company target or deadline. Follow all applicable policies and procedures in the manufacturing and testing of our products. Promptly report any safety, quality or performance issues.

TO REPORT ADVERSE EVENTS AND PRODUCT QUALITY ISSUES

USE THE SALESFORCE APP TO SUBMIT A COMPLAINT FORM

ADVERSE EVENTS AND PRODUCT QUALITY COMPLAINTS MUST BE REPORTED **WITHIN 24 HOURS** OF RECEIPT OF A COMPLAINT. ANY EVENT INVOLVING KNOWN OR SUSPECTED COUNTERFEITING OR TAMPERING WITH OUR PRODUCTS SHOULD ALSO BE REPORTED IMMEDIATELY BY CALLING CSI CUSTOMER SERVICE.

If you have suggestions for ways to better deliver on our commitment to quality and product safety, share them. If you see or suspect practices that are unsafe or compromise our products, it is your responsibility to report them to our quality team, your manager or someone in HR, Legal or Compliance.

CORE VALUE IN ACTION VELOCITY

I work with my team to continually evaluate, and if needed, improve our manufacturing processes. That agility ensures we always deliver safer and better products to patients in need.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further. What should I do?
- A** We never sacrifice quality to meet a deadline or target. All issues or deviations relating to manufacturing processes need to be investigated and evaluated. You should report the matter immediately to your manager or someone in Quality Assurance, HR, Legal or Compliance.

FIND OUT MORE

Customer and Product Complaint Reporting Policy (POL-0012)

Quality Policy (POL-0013)

CONDUCTING CLINICAL RESEARCH

Conducting clinical trials and research enhances our Mission and improves patient outcomes because it allows us to find ways to prevent, diagnose and treat disease. When participating in this research, take care to maintain high ethical principles, comply with all applicable laws and regulations and prioritize the safety, rights and dignity of all participants.

WE EACH HAVE A RESPONSIBILITY TO ...

Ensure our clinical research follows strict scientific standards and produces reliable results.

Clinical research should never be improperly influenced by Sales, Marketing or other commercial factors. Follow all applicable policies and protocols in conducting research and clinical testing, taking care to ensure the welfare of human subjects.

Respect the standard operating procedures we have in place to fully inform participants of potential benefits and risks, to protect the confidentiality of their private information and to protect vulnerable populations.

Every study or trial is designed to not only meet a scientific objective, but also to advance healthcare outcomes. To accomplish those objectives, we communicate results honestly and completely, and protect the integrity of our research data.

FIND OUT 
MORE

Interactions with Healthcare Professionals (POL-0002)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

WE DO WHAT IS RIGHT IN THE MARKETPLACE

IN THIS SECTION:

- Promoting Financial Integrity
- Preventing Bribery and Corruption
- Competing Fairly
- Avoiding Insider Trading
- Being Alert to Money Laundering
- Following Trade Compliance Laws
- Advancing Human Rights



PROMOTING FINANCIAL INTEGRITY

We make sure that our books and business records accurately reflect the financial state of our business. By doing so, we enhance our reputation and build our credibility with stockholders, customers, healthcare providers and business partners.

WE EACH HAVE A RESPONSIBILITY TO ...

Handle and record business records with care.

CSI is committed to full, fair, accurate, timely and understandable disclosure in all reports filed with the Securities and Exchange Commission ("SEC"), other governmental agencies and in other public communications. The information we maintain and provide should comply with our policies, applicable accounting principles and legal requirements. Maintain the integrity of our records, even if you are not in a finance or accounting role. In every transaction, whether you are filing an expense report, preparing a financial statement, approving an inspection or simply recording your time, be honest, clear, accurate and complete.

Never falsify or mischaracterize any account, book, transaction or other business records and never establish any undisclosed, unrecorded or off-the-record accounts for any purpose or discounts to any customers. Follow our records management records retention policies and never dispose of any information that is subject to a legal hold or that otherwise relates to an active investigation, audit or inspection.

WHAT KINDS OF DOCUMENTS COULD BE CONSIDERED "BUSINESS RECORDS"? THEY COULD BE PAPER OR ELECTRONIC AND MAY INCLUDE BUT ARE NOT LIMITED TO:

- > Accounting, expense and inventory reports
- > Contracts, bids and proposals
- > Emails and other correspondence
- > Meeting minutes
- > Regulatory filings
- > Timesheets
- > Vendor invoices
- > Text messages

CORE VALUE IN ACTION INTEGRITY



Every expense report I create has accurate entries and includes all required data and receipts. This may seem like a small thing, but it builds trust.

FIND OUT MORE



Expense Reimbursement and Corporate Travel and Entertainment Policy (POL-0004)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

PREVENTING BRIBERY AND CORRUPTION

Bribery and corruption can harm communities, the marketplace, patients and customers, and our 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. We derive our success from hard work and the quality and utility of our products – not bribes or kickbacks.

WE EACH HAVE A RESPONSIBILITY TO ...

Never offer or accept bribes. The penalties for offering or accepting bribes or kickbacks can be severe and may include jail time and fines for both individuals and CSI. Know and follow our policies and the law, including the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other anti-corruption laws. We can also be responsible for the actions of third parties who conduct business on our behalf, so select reputable third parties that share our commitment to integrity (see [Interacting with Suppliers and Vendors](#)).

Remember that facilitation payments – or unofficial payments made to government officials to smooth out the process of a routine government function – are never allowed, even if permitted by local laws. Also, always remember that keeping accurate books and records helps us detect and prevent corruption (see [Promoting Financial Integrity](#)).

WHAT OTHER FORMS DO BRIBES TAKE?

- > Job offers
- > Discounts
- > Cash or cash equivalents like gift cards
- > Meals, beverages or entertainment
- > Gifts (however small)
- > Preferential status or contracting terms
- > Charitable contributions

This list is not exhaustive so contact the Legal or Compliance Department with any questions.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I was reviewing an expense report and noticed a large payment made to a consultant for services that related to obtaining approval for a new product. There was no supporting documentation. What should I do?
- A** You should follow up. If they do not respond or refuse to provide you with proper documentation – or if you see or suspect a violation of our policies – notify your manager, Legal or Compliance immediately.

FIND OUT MORE

Interactions with Healthcare Professionals (POL-0002)

Expense Reimbursement and Corporate Travel and Entertainment Policy (POL-0004)

CSI U.S. Foreign Corrupt Practices Act and Anti-Bribery Policy (POL-0015)

COMPETING FAIRLY

We let our business integrity and abilities, and not unfair business practices, drive our success. We support a free and open market because fair competition allows us to innovate and continually improve our products, ensuring the best possible outcomes for our patients.

WE EACH HAVE A RESPONSIBILITY TO ...

Comply with competition laws everywhere we do business.

Understand how competition laws apply to you and your role, and use good judgment in any interaction with business partners, customers and competitors. Competition laws are complex and often difficult to navigate, so if you ever have any questions about what is appropriate and what is not, seek guidance.

If you gather information about competitors, use only appropriate methods for collecting reliable and accurate competitive information, such as public sources. Refuse information you suspect was improperly obtained and report the incident to your manager or someone in HR, Legal or Compliance.

COMPETING FAIRLY MEANS NEVER DISCUSSING OR AGREEING WITH COMPETITORS TO:

- > Fix prices or terms of sale.
- > Divide markets, customers or territories.
- > Prevent competitors from entering the market.
- > Refuse to deal with a particular customer or business partner.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I am at an industry conference and a couple of our competitors invited me to dinner. They said that we should all discuss “territory strategy” so that we can get through a current slump in sales. How should I respond?
- A** You should decline the invitation and contact Legal or Compliance. We never discuss territory division with competitors because it would likely violate the law. Share with the competitors your objection to the discussion then report their request as soon as you are able. Trade association and industry gatherings pose special risks because they bring together competitors, increasing the risk of a discussion about competitively sensitive matters. Use good judgment at these gatherings to avoid discussions that could violate competition laws.

AVOIDING INSIDER TRADING

Information that has not been released to the public and that could influence someone to buy, sell or hold securities of a company is considered inside information. As part of our jobs, we often work with or are exposed to inside information about CSI or other companies. We do not trade on inside information and we do not tip off others so they may trade on it. By avoiding insider trading, we promote efficient securities markets, maximize stockholder value and ensure compliance with all applicable insider trading laws and regulations.

WE EACH HAVE A RESPONSIBILITY TO ...

Avoid insider trading.

Do not trade on inside information or tip off others to trade on it.

Do not share inside information with others, even family members. Examples of inside information can include news or information about mergers or acquisitions, new products or projects, budgets, financial earnings or losses, and changes in executive leadership.

Depending on your job you may also be subject to blackout periods, or times where you must seek approval before making any trades involving CSI stock, whether you have inside information or not. If you are privy to any potential inside information, follow our Insider Trading Policy.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I was planning to make a trade before receiving inside information about a potential merger. Since my decision isn't based on receiving this information, is it OK to still make the trade?
- A** No. When trading, you have to avoid even the appearance of something improper. Once you receive inside information, you cannot trade until after that information is made public or is no longer applicable due to changed circumstances.

FIND OUT 
MORE

Insider Trading Policy (POL-0006)

BEING ALERT TO MONEY LAUNDERING

We are committed to conducting business in a way that prevents the use of our business transactions for money laundering purposes. We comply with anti-money laundering, financial crimes and anti-terrorism laws. We also use good judgment, work to know our customers and pay close attention when working with third parties, especially if a transaction involves cash payments.

WE EACH HAVE A RESPONSIBILITY TO ...

Prevent money laundering.

In order to prevent money laundering, it is important to stay alert. Understand how customers use our products and know who is behind every transaction. Only conduct business with reputable companies engaged in legitimate business activities and be able to identify questionable transactions.

Money laundering encourages criminal activity by giving those who make money in illegal, illicit or immoral ways a means to hide its criminal origin.

EXAMPLES OF QUESTIONABLE TRANSACTIONS MAY INCLUDE BUT ARE NOT LIMITED TO:



Payments made by individuals or companies who are not parties to the transaction.



Requests to ship to a country other than where the payment originated.



Attempts to pay in cash.



Attempts to avoid recordkeeping requirements.



Suspicious changes in the pattern of a customer's transactions.

FOLLOWING TRADE COMPLIANCE LAWS

As a company that exports and imports products from or to countries around the world, we recognize the importance of complying with the trade laws that apply to our business. Following trade compliance laws allows us to bring our products to patients around the world efficiently and economically.

WE EACH HAVE A RESPONSIBILITY TO ...

Move our products around the world legally and ethically.

We are subject to a number of laws that regulate how and with whom we can do business. If your job involves the movement of our products across borders, it is important that you know and follow the laws of the countries where we operate. Laws of more than one country can govern a transaction, so contact Legal with questions.

Remember that trade with certain sanctioned countries is prohibited by law. When trading with countries not subject to sanctions, document transactions completely and accurately and obtain required licenses before exporting or re-exporting our products. If you receive a request to trade with a sanctioned country, report it to your manager or someone in Legal or Compliance immediately.

Keep in mind that we do not participate in or promote boycotts imposed by any country that the United States does not support. If you receive a request to participate in or honor a boycott, an inquiry into our position on one or if you hear of a boycott that one of our business partners is participating in, contact your manager or someone in Legal or Compliance immediately.

WHAT ARE SOME IMPORTANT LAWS TO KEEP IN MIND? THEY INCLUDE LAWS REGARDING:

- > Trade sanctions
- > Specially designated national restrictions
- > Licensing requirements
- > Boycotts
- > Imports and exports
- > Diversion laws and regulations

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** If customs documentation does not show the final destination of the goods being shipped, what should I do?
- A** We have to ensure that the information included in trade documentation is complete and accurate, to the best of our knowledge. That means it should include the correct country of origin, end use, end user and final destination. If you know that the final destination of the goods being shipped is missing, update the documentation as soon as possible if it's within the scope of your job; otherwise, report it to the appropriate department.

FIND OUT 
MORE

Export Control Compliance Policy
(POL-0016)

ADVANCING HUMAN RIGHTS

We believe in having a positive impact on people and our world, so we set high standards for ourselves and our business partners. We advance human rights and, by doing so, promote the safety, health and welfare of everyone, everywhere.

WE EACH HAVE A RESPONSIBILITY TO ...

Protect the rights of everyone around us.

We respect the human rights and dignity of people throughout our operations, our global supply chain and the world. We comply – and expect our business partners to comply – with laws that advance human rights, including the rights of minority groups and women. By doing so, we promote safety and security. We stand against child labor, forced labor and human trafficking. We respect freedom of expression. We follow laws that require disclosure of conflict mineral use and we encourage everyone with which we do business to adopt similar standards.

TO HELP ADVANCE HUMAN RIGHTS, WE:

- > Pay fair wages.
- > Oppose discrimination and unequal treatment based on age, citizenship status, color, disability, gender, gender identity and/or expression, marital status, medical condition, national origin, pregnancy, race, ethnicity, nationality, religion, sexual orientation, veteran status or other protected class status under applicable law.
- > Value diversity and inclusion.
- > Never knowingly do business with a person or company that participates in human rights abuses.

If you have any human rights concerns about CSI or any of our vendors, suppliers or other business partners, please report them to HR, Legal or Compliance.

CORE VALUE IN ACTION COMMUNITY



I treat everyone with respect and leverage their talents appropriately. As a result, we are an effective team and have built a community, partnering with others who do the same to fulfill our Mission.

FIND OUT MORE >>>

Conflict Minerals (POL-0009)

Sexual Harassment and Discrimination Policy (POL-0017)

Employee Accommodation Policy (POL-0030)

WE SUPPORT OUR EXTERNAL COMMUNITIES

IN THIS SECTION:

Being a Good Neighbor

Protecting the Environment

Engaging in Political Activities



BEING A GOOD NEIGHBOR

We are active members of society, engaged in making our communities better places to live and work. We value giving our time and money to support the causes that align with our Mission and Values in ways that do not negatively impact CSI, the people we work with or the people we work for. We encourage you to support these causes by arranging volunteer events, and we allow you to take paid time off per our policies to volunteer for causes you personally support.

WE EACH HAVE A RESPONSIBILITY TO ...

Keep our personal volunteer activities separate from our work obligations.

If you choose to volunteer in charitable activities outside of work, make sure your participation does not conflict with the work you do on behalf of CSI. Do not use Company time or resources for your charitable activities, unless it is in accordance with specific Company policies or you have permission to do so from HR, Legal or Compliance.

Make sure you are clear that any views you share are yours and do not represent the views of CSI.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** I am involved in a personal charitable activity in my community. May I use our Company's letterhead or email system to solicit some of our business partners for contributions?
- A** No, soliciting our business partners for personal charitable activities may create the appearance of impropriety or a conflict of interest, and use of the email system is a misuse of Company assets.

FIND OUT 
MORE

Solicitation and Distribution Policy (POL-0021)

PROTECTING THE ENVIRONMENT

We aim to not only provide a safe workplace for our employees, but to do business in ways that keep the world outside of our walls safe as well. Protecting the environment protects us all, so we comply with environmental laws to reduce any potential negative impact of our operations.

WE EACH HAVE A RESPONSIBILITY TO ...

Improve our corporate sustainability by making business decisions that consider ethical, social and environmental factors.

We do our part to preserve natural resources and promote social responsibility. We strive to develop, manufacture and distribute our products in a way that minimizes our environmental impact and encourages social well-being.

Honor our commitment by following our policies, working with third parties that share our values and looking for ways to improve our processes. Follow environmental laws and ensure that any reports to government officials about environmental matters are complete, accurate and timely.

FIND WAYS TO HELP PRESERVE NATURAL RESOURCES, LIKE:



Conserving water and energy resources.



Recycling and sourcing recycled materials.



Reducing waste.



Reducing our greenhouse emissions.



Sourcing responsibly.

ENGAGING IN POLITICAL ACTIVITIES

Participating in the political process helps us improve our communities and become more productive members of society. Although we respect the rights of our employees to engage in the political process and we appreciate the various political viewpoints that can be found on our team, political participation should be separate from our work and consistent with the law and Company policies.

WE EACH HAVE A RESPONSIBILITY TO ...

Be engaged and good citizens.

If you find a political cause that you care about and would like to work for or support, do so in a way that makes it clear you are speaking and acting on your own behalf. Do not represent CSI in this effort without proper authorization. Also, respect colleagues by never pressuring them to get involved in causes you support as an individual.

WHEN ENGAGING IN POLITICAL ACTIVITIES:



Do so on your own time.



Do so with your own resources.



Never use the Company name without approval.



Act in ways that do not reflect negatively on CSI.



Seek help if you have legal questions or concerns.

EVERY PERSON. EVERY DECISION. EVERY DAY.

- Q** A coworker openly supports a different political party than I do. He knows that I don't agree with him, but he mocks my position and makes jokes about me all the time. I let my colleague know that his behavior offends me. Did I do the right thing?
- A** Yes. Every employee is entitled to his or her own political opinions. You did the right thing by letting your colleague know that his behavior offends you. Sometimes, a direct request like this is enough to stop the behavior. However, if it continues, it's appropriate to speak with your manager or someone in HR, Legal or Compliance about the situation.

FIND OUT 
MORE

Solicitation and Distribution Policy (POL-0021)

CLOSING THOUGHTS FROM OUR COMPLIANCE OFFICER



Our Mission at CSI is clear – improve patient outcomes by Saving Limbs, Saving Lives, Every Day. It is what drives each of us to do the work we do, and to move the field forward for patients in need. What we do is critically important, but it is also important to ensure that how we do our work embodies the highest ethical standards and our Core Values.

Despite our best efforts, each of us at one time or another may face business situations where the ethical path is unclear or there are competing goals. This Code is intended to provide you with the general concepts needed to navigate those difficult situations.

I ask that you help us set a strong foundation for CSI by following this Code, our Core Values, our policies and the law. Your adherence to these principles is just as important as the amazing work you do on behalf of CSI – it ensures that CSI will continue to be a sustainable Company that our customers, and more importantly our patients, can rely on.

Your responsibility? Incorporate the Core Values in your work every day. Read and understand this Code and all laws, regulations and CSI policies applicable to your role. Refer to this Code often. Ask for help when you have questions. Speak up when you have a concern or see misconduct. When you do all these things, you make CSI better for all.

A handwritten signature in black ink that reads "Sandra Sedo".

Sandra M. Sedo
Chief Compliance Officer