

Penumbra, Inc.

Transparency in Supply Chains Act Disclosure: Human Trafficking and Modern Slavery

Penumbra, Inc., headquartered in Alameda, California, USA, is a global healthcare company focused on innovative therapies. Penumbra designs, develops, manufactures and markets medical devices and has a broad portfolio of products that addresses challenging medical conditions and significant clinical needs. Penumbra sells its products to hospitals and clinics primarily through its direct sales organization in the United States, most of Europe, Canada and Australia, and through distributors in select international markets.

It is Penumbra's policy to comply with the laws and regulations applicable to our business activities around the world. The Penumbra Code of Business Conduct and Ethics addresses our strong commitment to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules and regulations.

Penumbra has a comprehensive global compliance program and is committed to ensuring that our global operations comply with legal requirements, such as the California Transparency in Supply Chains Act and the UK Modern Slavery Act.

Verification. Penumbra utilizes a variety of contracting and administrative tools to manage our business with suppliers, starting with a documented supplier evaluation process. Penumbra is updating its supplier qualification form to address risks of human trafficking and slavery.

Audits. Penumbra may perform on-site or desktop audits of its suppliers during the evaluation process or at any time thereafter. Penumbra plans to evaluate suppliers' compliance with human trafficking and slavery laws in tandem with announced audits that are conducted by Penumbra.

Certification. Penumbra's supply agreements require the supplier to operate in accordance with all federal, state, and local laws and regulations relating to the supplier's business with Penumbra. Penumbra may request that contracted suppliers and other suppliers certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the countries in which the suppliers do business. Penumbra may reconsider its willingness to partner with suppliers that fail to comply with or provide this certification.

Training and Accountability. All Penumbra employees receive training on the Code of Business Conduct and Ethics. In addition to our Code of Business Conduct and Ethics, Penumbra is developing a code of conduct for suppliers, which will require compliance with local labor laws and rules, including those with respect to wage and hour laws, as a condition of continuing to do business with us. Employees are encouraged to report violations of our Code of Business Conduct and Ethics. Penumbra's General Counsel uses tools such as our compliance hotline to ensure Penumbra employees maintain and reinforce the values and standards set forth in our Code of Business Conduct and Ethics.

Adam Elsesser
Chairman, President and CEO
Penumbra, Inc.
Adopted by the Board of Directors
May 3, 2019