

Pulmonx Corporation Supplier Code of Conduct

Effective: September 16, 2024

Introduction

Pulmonx Corporation and its subsidiaries and affiliates (collectively, “Pulmonx”) are committed to maintaining the highest standards of business conduct, ethics, and integrity. Pulmonx expects each of its suppliers, distributors and other partners in the supply chain and their subcontractors (collectively “Suppliers”) to share such values and comply with this Supplier Code of Conduct (“Code”). The obligations under this Code are in addition to any obligations required by contract or applicable laws.

A. Compliance with Laws

Suppliers will fully comply with all applicable laws, regulations, and codes of conduct.

B. Anti-Bribery and Anti-Corruption

Pulmonx strictly prohibits all forms of bribery and corruption in the conduct of its business and supply chain. Suppliers will fully comply with all applicable anti-bribery and anti-corruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act of 1977, as amended (the “FCPA”), the U.S. Travel Act, the U.S. Domestic Bribery Statute, the U.K. Bribery Act.

C. Fair Competition and Antitrust

Suppliers will not engage in anticompetitive agreements or collusion among competitors. Suppliers will fully comply with all applicable fair competition and antitrust laws and regulations.

D. Slavery and Human Trafficking

Suppliers will respect all human rights and should not, directly or indirectly, support or engage in Modern Slavery. Modern Slavery encapsulates slavery, servitude, forced or compulsory labor, and human trafficking as further described in the UK Modern Slavery Act of 2015. Suppliers must fully comply with all applicable laws and regulations regarding Modern Slavery.

E. Labor and Workplace Standards

1. Suppliers will not use child labor. Suppliers will fully comply with all applicable laws and regulations regarding minimum working age.
2. Suppliers will fully comply with all applicable employment laws and regulations, including but not limited to those regarding work hours, overtime, breaks, wages, benefits, and termination rights.
3. Suppliers will respect the right of workers to freely associate and collectively bargain and will not retaliate against workers for exercising or supporting such rights.

4. Suppliers will maintain a safe, healthy, and sanitary environment for their workers. Suppliers will not threaten, coerce, abuse, or physically discipline their workers. Suppliers will take reasonable steps to prevent workplace injuries and hazards.

F. Discrimination and Harassment

Pulmonx does not tolerate discrimination or harassment of any kind. Suppliers will provide equal opportunities and fair and equal treatment to all persons, including but not limited to workers. Suppliers will comply with all applicable laws and regulations related to discrimination and harassment.

G. Sustainability and Environmental Protection

Suppliers will strive to improve their environmental impact by seeking to reduce emissions, waste, energy, water and material consumption. Suppliers will comply with all applicable environmental laws and regulations.

H. Conflict Minerals

Pulmonx is committed to ethical sourcing and supply chain transparency with respect to conflict minerals, which include tin, tantalum, tungsten, and gold mined in the Democratic Republic of the Congo (DRC) and adjoining countries. Suppliers will endeavor to obtain minerals from conflict-free sources and implement appropriate policies and procedures in furtherance of this commitment. Suppliers will provide Pulmonx current, accurate and complete information related to their sourcing and supply chain. Pulmonx may request copies of relevant documents such as the Suppliers' conflict minerals statement, policies and declarations. Suppliers may also be required to complete and return a standardized Conflict Minerals Reporting Template ("CMRT"). Pulmonx expects Suppliers to cooperate with any additional inquiries deemed necessary by Pulmonx for any reasonable purpose, including but not limited to its reporting and disclosure requirements under the U.S. Dodd-Frank Act of 2010 and related rules promulgated by the SEC.

I. Confidentiality Information and Intellectual Property

Suppliers of Pulmonx may have access to information about Pulmonx that is confidential and proprietary, including but not limited to Pulmonx's intellectual property. Suppliers will keep this information strictly confidential and will not use or disclose the information for any purpose except as expressly permitted by Pulmonx in writing. Suppliers will at all times maintain reasonable security measures to protect such information from unauthorized use or disclosure.

J. Data Privacy and Protection

Suppliers will protect the privacy of personal information and implement appropriate safeguards to prevent unauthorized use or disclosure. Suppliers will fully comply with all applicable data privacy and protection laws and regulations.

K. Gifts and Conflicts of Interest

Suppliers will not allow personal interests to interfere with their obligations to Pulmonx and must not engage in any activity that creates, or creates the appearance of, a conflict of interest. Suppliers must not offer or accept cash, favors, gifts, or entertainment from business partners to gain improper advantage.

L. Compliance and Reporting

1. Pulmonx may request that Suppliers demonstrate compliance with this Code. It is the Suppliers' responsibility to maintain adequate records or documentation to demonstrate compliance.
2. Pulmonx may investigate and audit Suppliers' operations to verify compliance with this Code.
3. Pulmonx expects Suppliers to fully cooperate with any inquiries, investigations, or audits by Pulmonx to verify the Suppliers' compliance with this Code.
4. Supplier should immediately report any known or suspected violation of this Code to Pulmonx's Legal Department at legalteam@pulmonx.com. Any reported violations will be appropriately investigated.
5. Pulmonx may immediately terminate its business relationship with any Supplier if Supplier fails to comply with this Code.

M. Additional Information

Please visit our Corporate Governance website at <https://investors.pulmonx.com/corporate-governance/documents-and-charters> for Pulmonx's corporate policies.