

Supplier Code of Conduct

At Tactile Medical, our Mission to reveal and treat people with underserved chronic conditions and help them care for themselves at home, guides all we do. Our values are also woven into our daily operations as we strive for continual improvement. We hold our suppliers to these same high standards. We expect them to:

- Conduct business ethically and legally
- Meet or exceed quality standards for products and services
- Value human rights, safety and implement fair labor practices
- Be a responsible environmental steward

BUSINESS AND ETHICS

Tactile Medical's Code of Business Conduct and Ethics is the framework for our business practices. We expect our suppliers to maintain and follow a Code of Ethics and Business Conduct that values ethical and fair business practices.

Compliance Program: We take pride in our robust Compliance program, and we expect our suppliers to have similar standards including the implementation of relevant policies and procedures. A Compliance program with leadership oversight is an important element of an ethical business. This ensures that policies and procedures are being followed, as well as supports ethical decision making companywide.

Legal Compliance: We ensure compliance with all federal, state and local laws and regulations by implementing various policies and processes and we expect our suppliers do the same.

- Fair business: We seek to conduct business with partners that share our values and are committed to ethical business practices and transparency. Our suppliers are required to abide by fair business and competition standards.
- Bribery and corruption:
 - We interact with a wide variety of healthcare professionals, organizations and businesses. We are committed to ensuring transparency, fairness and legal compliance by implementing policies and procedures regarding the Anti-kickback Statute, the False Claims Act, the Sunshine Act and the Foreign Corrupt Practices Act. Bribes, kickbacks and similar remuneration or arrangements are prohibited. This applies both to individuals acting on our behalf and Tactile Medical as a company.
 - Supplier payments are made through our accounts payable department following stated processes and are properly recorded and reported according to recognized accounting standards. Our suppliers agree to follow these principles and corresponding laws and regulations.

Gifts: We do not accept gifts from suppliers that could be perceived as creating an inducement or conflict of interest.

Conflicts of Interest: A conflict of interest arises when an individual's personal interest may interfere with, or be perceived to interfere with, the company's best interests. Conflicts of interest are addressed in Tactile Medical's Code of Business Conduct and Ethics. Conflicts of interest will be evaluated and can only be waived by appropriate personnel, as outlined in our Business Code of Conduct. This policy and process applies to employees, contractors, business associates, partners, board members and suppliers. We require our suppliers to have a similar policy and process in place.

Regulatory Compliance: Our products are regulated by the Food and Drug Administration and meet specific standards to ensure safety. Our suppliers are required to comply with relevant regulations as well.

Confidentiality/Privacy:

- Tactile Medical understands the importance of confidentiality and privacy. We respect our employees', patients' and healthcare providers' right to privacy and the need to protect intellectual property. Our suppliers are expected to value confidentiality and privacy as well.
- Intellectual property: Our intellectual property is a valuable asset. It is the foundation upon which our business was created. Our suppliers are required to protect our intellectual property and other confidential or sensitive information they may encounter within the course of business. Negligent, reckless or intentional improper use or disclosure of this information is prohibited.

QUALITY

Tactile Medical takes pride in the quality of our products and services. Our patients trust us with their health and well-being. An effective Quality Management System is one of the many ways we validate this commitment. Our Quality standards are encompassed in our Quality Statement as well as the applicable policies and procedures we have implemented. We expect our suppliers to share our commitment to quality.

Quality Management Systems: We utilize a Quality Management System (QMS) to ensure proper processes are followed and top-quality products are made. Our suppliers are required to maintain a Quality Management System that is compliant to FDA 21CFR820, ISO 13485 or equivalent.

Quality Audits: Audits are a means to evaluate the effectiveness of a Quality Management System. Tactile Medical will evaluate and assess our suppliers based on risk and experience, but we also understand the importance of verifying these systems via audit processes. Our suppliers authorize Tactile Medical to perform periodic quality audits. A quality audit may be performed on-site, virtually or via desktop audit. The type of audit is based on the location, complexity of process, the degree to which the supplier's operations are unique or other appropriate parameters.

HUMAN RIGHTS

Tactile Medical values human rights and adopts fair labor standards, including human trafficking prevention measures, as one reflection of this important value. Diversity, equity, inclusion and commitment to fair and safe working conditions are core focuses when analyzing our impact on human rights.

Human Trafficking Prevention:

- Each of us has a responsibility to prevent human trafficking. Tactile Medical prohibits human trafficking-related activities. This includes, but is not limited to:
 - Engaging in any activity or business involving trafficking of any persons
 - Procuring commercial sex acts
 - Any form of forced or coerced labor
 - Intentionally misleading individuals during recruitment or hiring processes regarding terms of employment, benefits and compensation
- We comply with federal and state regulations regarding prevention of human trafficking by:
 - Providing required notice of federal and state laws as applicable
 - Evaluating risk in the supply chain
 - Auditing suppliers as appropriate
 - Maintaining internal policies and procedures addressing human trafficking prevention and reporting mechanisms
 - Protecting against physical and mental punishment of workers
 - Providing employee training
 - Protecting workers from unlawful discrimination. Our suppliers are expected to adopt policies or processes to prevent human trafficking in their organizations.

Equal Opportunities and Anti-Discrimination: Diversity supports a corporate culture of inclusion and tolerance. We prohibit discrimination and harassment based on sex/gender, sexual orientation, gender identity, age, national origin, disability, race, religion, marital status, protected veteran status and all other characteristics or classifications protected by law. Our suppliers should provide equal opportunities and fair and equal treatment to employees consistent with these values. This applies to recruitment, hiring decisions, training and education programs, and promotions.

Compensation and Benefits: We comply with federal, state and local regulations regarding minimum age, wage, working hours, overtime and benefits. We ensure fair compensation and attractive benefits by being transparent from the beginning of the hiring process. We expect our suppliers to be compliant with applicable wage, hour and labor laws, and that they provide fair/reasonable compensation and benefits to their employees.

Working Conditions: We emphasize safety in everything we do. We expect our suppliers to provide safe working conditions for their employees. This includes:

- Providing workplace safety training and education
- Ensuring proper handling of hazardous materials
- Implementing emergency response procedures
- Prohibiting forced and child labor

Non-Retaliation: We prohibit retaliation for reporting unlawful conduct or violation of policy or procedure. This supports issue reporting and corrective action(s). Our suppliers are expected to provide a safe space for their employees to do the same.

ENVIRONMENTAL RESPONSIBILITY

Tactile Medical is committed to evaluating our environmental impact and dedicating resources towards improvement. Our suppliers are expected to comply with applicable laws and regulations regarding environmental protections, permits and licenses for their business and locations. Suppliers should have systems in place to prevent adverse environmental impacts as a result of their business operations, recycle when able to and in general, reduce the impacts on the environment when possible.

Substances of Concern: The health and safety of our employees, patients and business partners is important. The National Institute of Health has identified a list of substances of concern that can cause risks to health and safety if used in excess. Please see Environmental Programs Substances of Concern (nih.gov). Our suppliers should follow applicable guidance provided by the National Institute of Health in relation to potentially hazardous substances.

Conflict Minerals: We strive to obtain supplies and manufacture our products ethically, including taking steps to assure that we do not finance or benefit groups that have been identified as perpetuating human rights violations. If materials supplied to Tactile Medical contain any conflict minerals as indicated under Section 1502 of the U.S. Dodd-Frank Act, suppliers must:

- Disclose the use of minerals
- Provide additional information upon request, as allowed under the Act
- Implement and abide by an internal policy regarding the use of these products. We require suppliers to comply with the Act and associated regulations