

Nevro Conflict Minerals Policy

Nevro is committed to corporate social responsibility and sourcing materials for its products in a socially and environmentally responsible way.

OVERVIEW

Pursuant to the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act and the 2012 U.S. Securities and Exchange Commission Final Rule (collectively, “Conflict Mineral Rules”), certain publicly-traded companies must annually disclose whether the products they manufacture contain tantalum, tungsten, tin, or gold (“3TG Minerals”) originating from the Democratic Republic of the Congo or any of its nine adjoining countries (“Covered Country”). Should a company determine or have reason to believe that the 3TG Minerals present in its product(s) are sourced from a Covered Country and are not scrap or recycled in nature, it must carry out a good faith due diligence review of its supply chain to determine the chain of custody and source of such 3TG Minerals.

POLICY DETAILS

Nevro pledges to act with integrity as it takes steps to fully comply with all applicable laws, governmental regulations, rules, requirements, ordinances, and other local, state, federal and foreign requirements.

The manufacture of Nevro’s products is significantly removed from the mining, smelting, and 3TG Minerals. As a result, Nevro expects its suppliers to collaborate with Nevro to determine the source and chain of custody of 3TG Minerals used in its products.

Upon request, Nevro expects its suppliers to:

- Identify the smelters, refiners, and/or mines from which the products it supplies originate from and supply Nevro with accurate source and chain of custody information in a timely manner;
- Explain the process and steps taken to determine the source and chain of custody of 3TG Minerals and designate whether the identified smelters, refiners, and mines have been verified by an industry-recognized, independent third party (e.g., Conflict-Free Sourcing Initiative (“CFSI”), London Bullion Market Association (“LBMA”), and/or Responsible Jewellery Council (“RJC”)); and
- Promptly advise Nevro of any determination that the products or materials in its supply chain are not conflict-free.

Nevro evaluates its relationship with its suppliers on an ongoing basis. If a supplier fails to comply with this Conflict Minerals Policy, Nevro will take appropriate action, which could result in termination of the supplier relationship.

Nothing in this policy is intended to modify or otherwise limit Nevro’s contractual or legal rights.

QUESTIONS OR CONCERNS

Concerns regarding compliance may be reported:

- By e-mail: conflict.minerals@nevro.com
- By calling Nevro’s toll-free Compliance/Ethics Hotline: (855) 241-1903

Suppliers and other external parties are encouraged to contact their regular Nevro business contact if they would like additional guidance on this Policy.