



[Declaration of Compliance with California Health and Safety Code §119402](#)

Nevro Corp. (“Nevro” the “Company”) has adopted a Comprehensive Compliance Program that is centered around the seven elements of an effective compliance program as set forth in the United States Department of Health and Human Services Office of Inspector General’s (“OIG”) April 2003 publication “Compliance Program Guidance for Pharmaceutical Manufacturers” and the United States Department of Justice April 2019 publication “Evaluation of Corporate Compliance Programs.” The program also requires compliance with voluntary industry guidelines, including the Advanced Medical Technology Association’s “Code of Ethics on Interactions with Health Care Professionals” (“AdvaMed Code”).

In accordance with the California Health and Safety Code §§119400-119402 (the “California Act”), Nevro established an annual spend limit of \$2,500 for items and activities provided by a Nevro employee to covered recipients in California. As provided for by law, this annual limit does not include the following: items provided to health care professionals that are ultimately intended for patients or consumers; receptions at third party educational or professional meetings; financial support for continuing medical education forums; financial support for health educational scholarships provided in compliance with AdvaMed Code guidance; payments made for legitimate professional services provided by a health care professional, including but not limited to, consulting services that do not exceed the fair market value of services rendered and ancillary payments made in conformity therewith; and other expenses that are directly associated with payment statutorily excluded from the limit.

To the best of its knowledge, Nevro declares that as of July 1, 2019, it is in all material respects in compliance with both its Comprehensive Compliance Program and the requirements of the California Act. Anyone wishing to obtain a copy of this document or other documents referenced herein, or to report a potential compliance violation, may contact [compliance@nevro.com](mailto:compliance@nevro.com) or call our toll-free compliance hotline at 855.241.1903.