

Report

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# Environmental, Social and Governance Responsibilities at Nevro



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# Forward-Looking Statement

In addition to historical information, this report contains forward-looking statements reflecting Nevro Corp.'s (“we”, “us”, “Nevro” or the “Company”) current beliefs and expectations of management made pursuant to the safe harbor provisions of the Private Securities Litigation Reform Act of 1995, including statements regarding current and future compliance initiatives, and expected environmental, social and governance policies and practices.

These forward-looking statements are based upon information that is currently available to us or our current expectations, speak only as of the date hereof and are subject to numerous risks and uncertainties. The factors that are described in greater detail in our Annual Report on Form 10-K filed on February 23, 2022, as well as any reports that we may file with the Securities and Exchange Commission in the future, may cause actual results, performance or achievements to differ materially and adversely from those anticipated or implied by our forward-looking statements. We expressly disclaim any obligation, except as required by law or undertaking to update or revise any such forward-looking statements.



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“2021 brought us many exciting challenges and opportunities. As we manage renewed growth, we have an increased responsibility to operate our business for the benefit of all stakeholders.”

**D. Keith Grossman**  
*Chairman, Chief Executive Officer and President*

## CEO Letter

Dear Nevro Stakeholders,

Thank you for reading our second corporate sustainability report.

We are proud of the progress we have made on Environmental, Social and Governance (ESG) priorities in the last two years, excited about the many opportunities ahead and looking forward to connecting with you through this report. We have a unique and important story to share.

Nevro was established in 2006 with the simple goal of helping more patients with chronic pain achieve greater and lasting relief. While traditional low-frequency spinal cord stimulation (SCS) has been around for over 30 years, Nevro created a revolution in pain therapy by offering a next-generation high-frequency approach, 10 kHz Therapy, providing patients with superior pain relief without the paresthesia (a constant tingling or buzzing sensation) used by low-frequency approaches. With Nevro products, tens of thousands of patients worldwide now enjoy more freedom and improvement in their daily lives, including in areas that have traditionally been difficult to treat with traditional, low-frequency SCS.

At our core, Nevro is about driving superior outcomes for the people we serve, the communities we interact with and our shareholders. Nevro’s business, our very reason for being, is to do good and to help people who desperately need it. Doing these things, and in the right way, are in our corporate DNA.

While our business continued to be challenged by the pandemic in 2021, we also believe we are on the road to recovery and ultimately to renewed growth in 2022 and beyond as we put the pandemic behind us. As we manage our renewed growth, we have an increased responsibility to operate our business for the benefit of all stakeholders. This includes not only our customers and patients, but also our shareholders, employees, suppliers and communities. Our commitment to responsible business practices and transparent disclosure of our ESG performance has been the driving force behind the initiatives that we describe in this report.

Our ESG strategy continues to be rooted in our Vision, Mission, Values and our company culture.

2021 brought us many exciting changes. We rolled out a newly articulated set of company Values, refreshed our Mission and Vision, opened our Costa Rica manufacturing site where we have made climate change commitments, evolved our corporate governance, focused our Inclusion, Equity and Diversity (IE&D) work and supported our communities – just to name a few highlights. In this new report, you will see our approach to ESG being refined thanks to a materiality assessment we conducted and new metrics aligned to well-known reporting standards.

As we continue to move from recovery to renewed growth, we thank you for your continued support of Nevro.

*D. Keith Grossman, Chairman, Chief Executive Officer and President*

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At Nevro, we believe true  
innovation transforms  
more lives.

## About Nevro

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- Company Profile
- Spotlight: Vision, Mission, Values

## About Nevro

### Company Profile

Nevro produces medical devices for patients who are suffering from chronic pain. Through using the company's medical devices, patients can receive pain relief and improve their health outcomes and quality of life. Nevro is a medical device company headquartered in Redwood City, California that has the simple goal of helping more patients suffering from chronic pain achieve lasting relief.

The company is the creator of HFX, one comprehensive solution for individualized relief of chronic pain to help physicians meet the diverse needs of patients by offering:

- Innovative Technologies
- Advanced Therapies
- Services & Support
- Meaningful Evidence

# At Nevro, we believe true innovation transforms more lives.

While traditional SCS has been around for over 30 years, Nevro disrupted the industry by offering its innovative HFX therapy, the most studied therapy in the market, which provides patients with significant pain relief, without paresthesia.

The Nevro® Senza® SCS System for 10 kHz Therapy received CE mark in Europe in 2010, Australia's Therapeutic Goods Administration (TGA) approval in 2011, U.S. Food and Drug Administration (FDA) approval in 2015, and is commercially available in Europe, Australia and the United States. More recently, we received approval in the U.S. for our 10 kHz Therapy to treat the millions of patients suffering from both painful diabetic neuropathy (PDN) and non-surgical refractory back pain (NSRBP), becoming the first SCS company to receive explicit labeling on both conditions. Worldwide, tens of thousands of patients are enjoying more freedom and improvement in their daily lives with Nevro products.

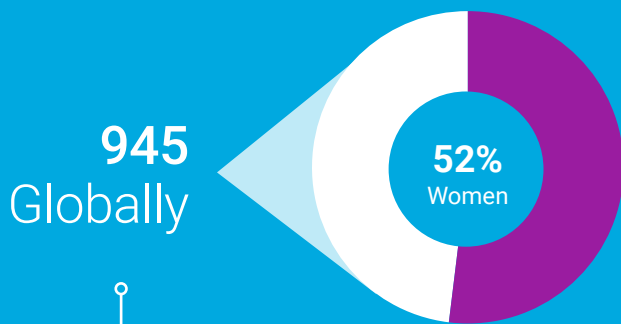
Nevro's HFX delivers the most waveform types in a single product, thus helping patients to achieve long-term pain relief.



**2021 Revenue** (in millions)

US sales	\$326.2
International sales	\$60.7
<b>Total revenue</b>	<b>\$386.9</b>

**Employees/Geographic Reach** (as of Dec 31, 2021)



- Australia
- Austria
- Belgium
- Costa Rica
- Germany
- Netherlands
- Sweden
- Switzerland
- U.K.
- U.S.

**791**  
U.S. Based

**30.7%**  
Underrepresented  
Talent

**33.2%**  
Women in  
Leadership  
Positions



## Spotlight: **Vision, Mission, Values**

A values-based culture is powerful. It drives employee engagement, organizational performance and customer satisfaction and loyalty. But it doesn't just happen. As Nevro continues to focus on our future, we directed efforts in 2021 to refining our Values to unite and engage our team, hone our patient focus and provide clarity to the purpose of all we do.

We are pleased to share our Vision, Mission and Values.



### **Vision**

Freeing patients from the burden of chronic pain.



### **Mission**

By combining the brightest talent with the strongest foundation of clinical evidence, we deliver comprehensive, life-changing solutions that continue to set the standard for enduring patient outcomes in chronic pain treatment.





## Values



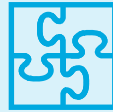
### Patients First

At Nevro, we seek to better patient care in all we do and consider patient impact in all decisions. We are relentlessly dedicated to improving outcomes. We delight our patients with the experience we provide. In everything we do, we ensure the highest quality products and services.



### Ownership

Our plans are a series of commitments we make to our customers, patients, shareholders and each other. Hold yourself and those around you accountable for delivering on those commitments and expect others to do the same with you. In every plan we make, you contribute by knowing what “good” looks like in advance and being honest about the ultimate results. You can actively identify issues and challenge deficiencies. Pitch in, sign up and be a handraiser.



### One Team

We are all part of Nevro first, not a department. We build and collaborate cross-functionally, making for better decisions, fewer mistakes, faster progress and limitless possibilities. Great ideas can come from anywhere and anyone, so we seek them out and listen. This all allows us to embrace both the scientific and the creative and strive for excellence through continuous improvement. We stay committed to leveraging the strengths, ideas and experiences of each team member to optimize performance as One Team. Together, we strive for excellence through continuous improvement.



### Elevate Diversity

Conformity is corrosive. Preconceptions are limiting. Diversity in opinions, approaches, experiences, backgrounds and lifestyles makes us stronger, so we encourage it. In order to do so, we listen for complete understanding and do not assign the contributions of others to categories based on superficial bias. We always act with inclusion and respect. Through positivity, confidence and graciousness, we lift up customers and team members. These actions encourage new ideas and diverse ways of thinking, welcoming those stepping up and out of their comfort zone.



### Courageous Leadership

At Nevro, we believe that leadership is part of your character and your behavior, not your title, and as a result, everyone can lead by example. Our success is everyone’s responsibility – take ownership and be part of the answer. We are candid about our progress to our goals and values. By confronting our shortcomings, we can take constructive actions to raise awareness, breaking the silence that protects weakness. We deal fairly, directly and constructively with others if there are concerns. We celebrate excellence, but we don’t punish or fear failure; it’s the pathway to success.



### Do the Right Thing

At Nevro, we act with integrity and always do the right thing. Follow your very best instincts, but also follow applicable laws, regulations and company policies. Compliance with these is critical to our Values and success, and they are in place for a reason to protect you, our business and the patients and customers we serve. We are a highly regulated business for good reasons. You are essential in cultivating an environment where everyone follows the rules.

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As we prepare to move from recovery to renewed growth, we thank you for your continued support of Nevro.

### ESG Strategic Framework

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- Materiality and Stakeholders
- Stakeholder Groups
- Material ESG Issues
- Key Areas of ESG Focus

# ESG Strategic Framework

## Materiality and Stakeholders

Our ESG disclosures are managed by a cross-functional internal ESG committee consisting of senior leaders from Finance, Legal, Human Resources, Communications and Investor Relations. The ongoing goal of this committee is to identify material sustainability topics, establish a corresponding sustainability reporting framework and report on efforts annually.

## Stakeholder Groups

- Patients
- Customers
- Employees
- Investors
- Suppliers
- Regulatory agencies and governments
- Local communities where we operate

## Material ESG Issues

The ESG committee relies on shareholders' feedback, sustainability frameworks and guidelines such as those published by the Sustainability Accounting Standards Board (SASB) and the Task Force on Climate-Related Financial Disclosures (TCFD). In addition, we use peer external benchmarking and ESG rating agency scoring methodologies to identify new areas of focus and opportunities. These insights, along with our management team's contributions, inform our materiality framework and help us identify relevant topics for disclosure.

We are committed to incorporating these issues into our business operations, to focus on the topics that matter most to our business and stakeholders and to continually evaluate our sustainability issues for the future.

To highlight Nevro's key ESG accomplishments in 2021 and go-forward priorities, this ESG Report is organized around Environment, Social and Governance.

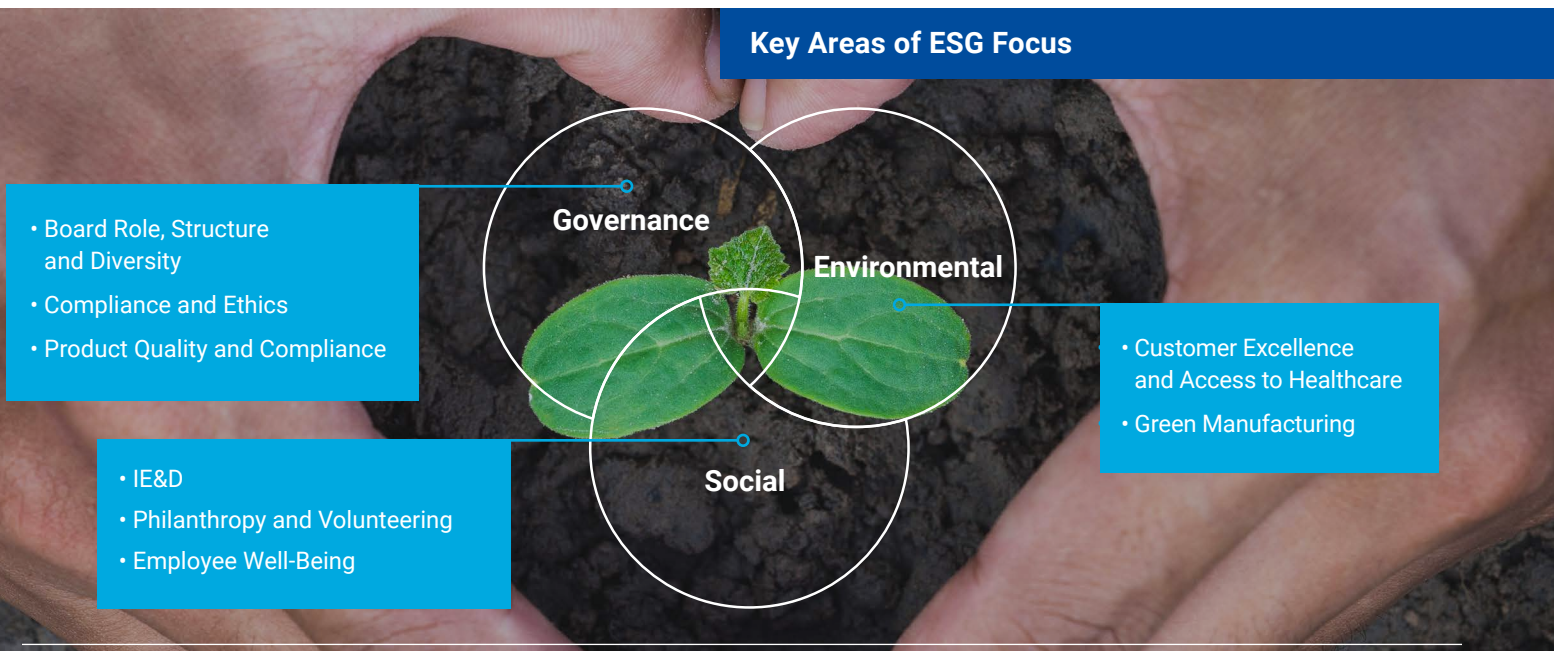
## Key 2021 accomplishments highlighted in this report include:

- Packaging sustainability (E)
- Green manufacturing launched in Costa Rica (E)
- Expanded IE&D initiatives (S)
- Focused community engagement (S)
- Launch of new corporate values (G)

## Additional content areas in this ESG report include:

- ESG Strategic Framework
- Support of public health/pain management through concierge customer service
- Reporting frameworks and expectations for future reporting

## Key Areas of ESG Focus





We are committed to continually evaluating our sustainability issues for the future.

## Environment

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- Product Launches and Research & Development
- A History of Innovation
- Spotlight: Green Manufacturing in Costa Rica
- Supporting Public Health and Pain Management Through Concierge Customer Service
- Quality Systems
- Approach to Product Quality
- Product Design/Product Safety
- Spotlight: Packaging Design
- Product Manufacturing

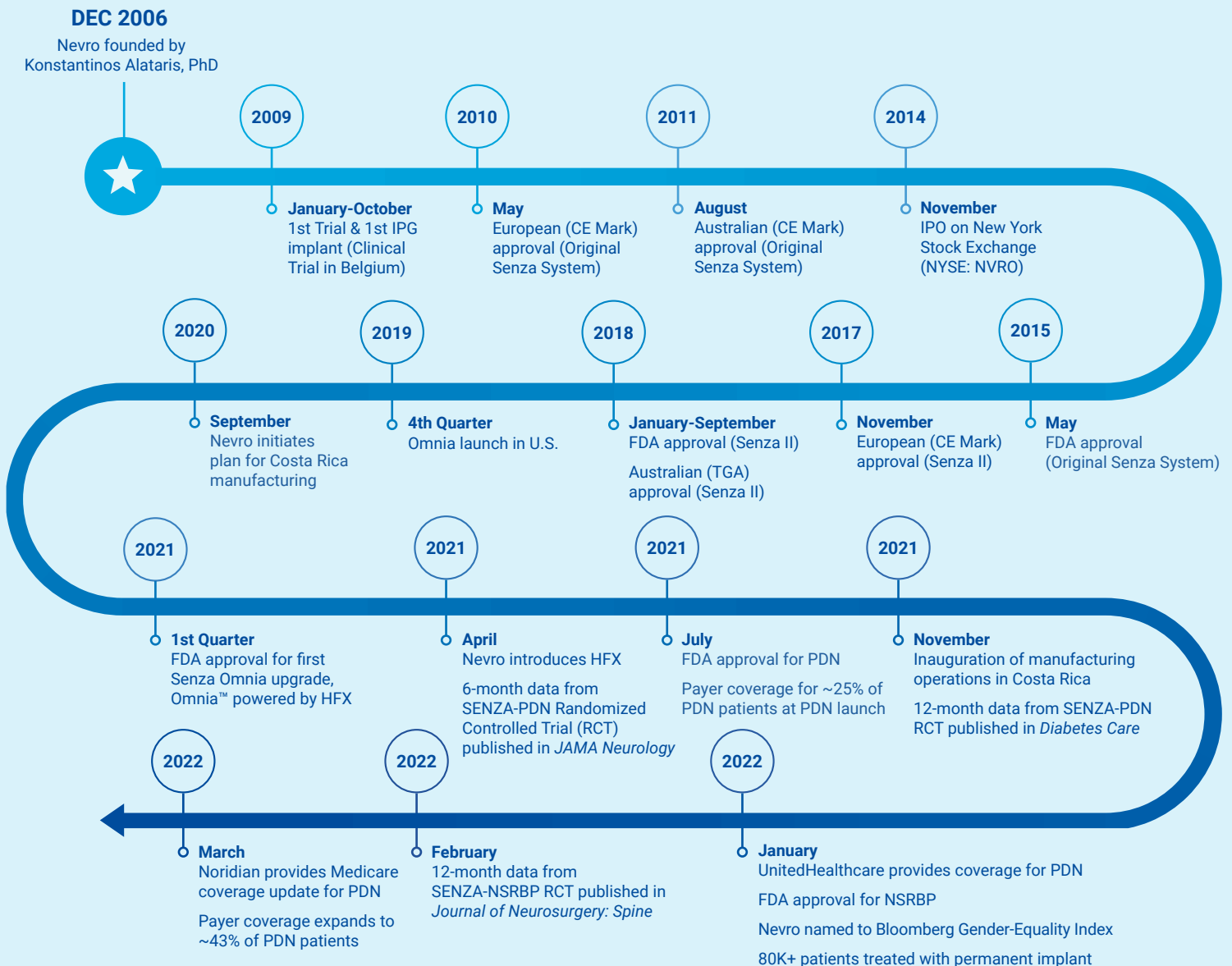
# Environment

## Product Launches and Research & Development

Since the launch of the initial Senza system, we have continued to invest heavily in innovation. Our long-term objectives continue to be the improvement of patient outcomes and the further expansion of patient access to 10 kHz Therapy through enhancements to Senza and the development of new indications.



## A History of Innovation



## Spotlight: Green Manufacturing in Costa Rica

Costa Rica is among the top 10 “green” countries in the world. In connection with our decision to select that country as the site of our manufacturing operations, we conducted extensive due diligence to ensure Nevro met the country’s environmental requirements.

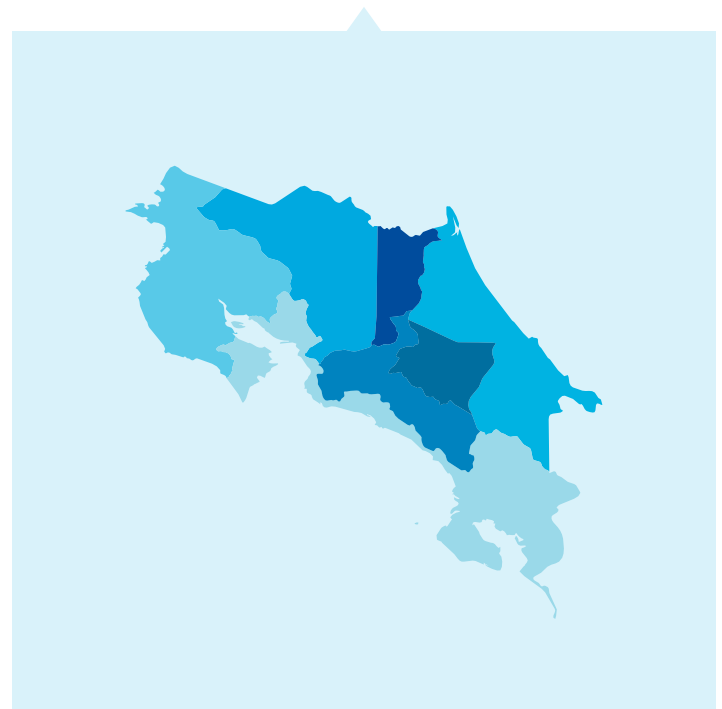
Nevro engaged a local environmental consulting firm and completed a detailed environmental impact assessment that was submitted to the Costa Rican Environmental Authority. This was a prerequisite before Nevro submitted the application for operating as a business in the selected Free Trade Zone Park where our facility is located. As we continue with the phased buildout of our manufacturing operations, we will work closely with local authorities, environmental agencies and third-party environmental consulting companies to ensure we meet local regulatory requirements.

Importantly, we are also committed to meeting the requirements of the Costa Rican Ecologic Blue Flag program (called Programa Bandera Azul Ecológica in Spanish, but referred to as Blue Flag here), a voluntary annual program that acknowledges the effort of organizations such as Nevro to pursue conservation and sustainable development. The Blue Flag program is a joint venture of several Costa Rican institutions awarding organizations for voluntarily meeting strict guidelines for water quality, environmental education, natural resource management and safety. The program focuses on key sustainability initiatives including the protection of natural resources; the acknowledgement of climate change and active work to prevent the deleterious effects of climate change; and the quest to improve hygiene and sanitary conditions, as well as public health for Costa Ricans. *Source: [www.ict.go.cr/en/sustainability/ecologic-blue-flag-program.html](http://www.ict.go.cr/en/sustainability/ecologic-blue-flag-program.html)*

An organization that wishes to participate in the program must fill out an application form and submit annually. As a means of tracking accountability, each organization must prepare an annual report covering the prior year’s reporting period and submit the information to continue to be eligible.



The Blue Flag program in Costa Rica has convinced business owners and communities of consumers to use less electricity, fossil fuels, water and paper. And it is constantly expanding with new environmentally responsible initiatives.



Nevro proudly subscribed to the Blue Flag program as part of our grand opening design. Nevro currently tracks and manages environmental metrics and objectives in the design, construction and ramp-up phases of our manufacturing facility in Costa Rica.

As manufacturing operations fully commence, Nevro will track, monitor and report on multiple metrics. We are committed to sharing the most relevant metrics with our stakeholders in our future reports.

Nevro is proud to have opened our first manufacturing operations in Costa Rica and looks forward to reporting on progress in alignment with the Blue Flag criteria for climate change.

**In 2022, we plan on tracking, and subsequently disclosing in our next ESG report, the following environmental metrics related to our Costa Rica operations:**

- Water usage
- Energy usage
- Amount of training conducted
- Hazardous waste
- Recycling of total segregated waste
- Nightly energy usage

We were thrilled to officially cut the for ribbon Nevro's global manufacturing operations in Costa Rica on November 11, 2021. We'd like to thank Costa Rican President, Carlos Alvarado; Minister of Foreign Trade, Andrés Valenciano; and CINDE's Managing Director, Jorge Sequeira, for joining our Chairman, CEO and President D. Keith Grossman to mark the occasion.

Pictured (left to right): Jorge Sequeira, D. Keith Grossman, Carlos Alvarado, Andrés Valenciano and Njamh Pellegrini



Holly Boka, a Nevro patient, shared her inspiring story after witnessing a serious vehicle accident.

## “I literally saved a life yesterday.”

“I watched this truck flip three times and a girl was ejected. I hit my SOS, jumped the guardrail and ran across the median. There was a 17-year-old boy trapped in the truck upside down, and the truck was on fire. We were able to get him out and put him on the tailgate. The boy’s leg was badly broken. I was a paramedic before my accident, but I had to stop working because of my injuries and pain. I truly believe that if I didn’t have my stimulator, I wouldn’t have been able to help him.”



### Supporting Public Health and Pain Management Through Concierge Customer Service

Caring for each other is one of the most important and fundamental things we do as humans. So why has it become so complicated? Chronic pain management is not simple and straightforward.

To complicate things even further for those with chronic pain, access to a medical support system has been even more limited in the COVID-19 era. To help patients manage through all the potential solutions, Nevro maintains our concierge customer service. This effort is part education, part connection, part navigation. It provides personalized support to help patients tackle the logistical and administrative tasks of finding appropriate solutions. The work can be summed up in two words: time and transparency. Our goal is simply to help more patients suffering from chronic pain achieve lasting relief.

In 2021, we experienced a triple-digit percentage increase in requests for information and assistance through our concierge services.



## Quality Systems

### Regulations

Quality is at the core of everything we do. Patients rely on our products to be safe and effective. We take their trust seriously and as we continue to deliver innovative treatments and therapies, our commitment to quality will always remain a top priority.

Our products and operations are subject to extensive and rigorous regulation imposed by the FDA and similar agencies in foreign jurisdictions.

These requirements cover the methods used in, and the facilities used for, the design, testing, control, manufacturing, labeling, quality assurance, packaging, storage and shipping of our products.

For products distributed in the United States, for example, Nevro is required to manufacture any products sold in compliance with the FDA's regulatory requirements and Quality System Regulation. It often takes several years to satisfy these requirements, depending on the complexity and novelty of the product. Nevro is also subject to numerous additional licensing and regulatory requirements related to safe working conditions, manufacturing practices, environmental protection, fire hazard control and disposal of hazardous or potentially hazardous substances.

### Some of the most important requirements we must comply with include:

- U.S. Food, Drug & Cosmetic Act and FDA's implementing regulations
- European Union CE Mark requirements
- Medical Device Quality Management System requirements (ISO 13485:2016)
- Occupational Safety and Health Administration requirements
- California Department of Health Services requirements

To support and enhance our product quality efforts, Nevro has developed, documented and implemented a Quality Management System (QMS), which is continuously maintained, monitored and improved upon based on internal policies.

Our commitment to quality will always remain a top priority.



### Approach to Product Quality

Nevro's QMS is based on the "process approach" where risk is applied to control the appropriate processes. The management of quality applies to all areas of our business.

#### This includes, but is not limited to:

- Research & Development
- Clinical
- Supply Chain
- Validation/Qualification Operations
- Laboratory and Testing Product Release
- Distribution
- Marketing
- Post-Market Surveillance

Our global quality strategy assesses the safety, security and reliability of our products at each stage of their life cycle. We monitor compliance with our standards through our QMS, which is aligned to applicable regulations and international standards, including ISO 13485. Our enterprise-wide risk management process, which is aligned with ISO 14971, helps ensure early identification and prompt escalation of potential product or safety issues.

**Nevro adheres to compliance with applicable regulatory requirements to maintain regulatory certifications and will continue to be periodically inspected by domestic and international regulatory authorities for certification purposes.**

Nevro is committed to the development and improvement of the QMS by providing necessary resources and conducting management reviews, internal quality audits and corrective and preventive action activities.

We take our responsibility to the people using and benefiting from our products very seriously; safety is always our priority.

### Product Design/Product Safety

#### Design, Reliability, Traceability and Manufacturability

The Nevro design methodology is a set of best practices that help to ensure quality, safety and dependability at every stage of the product design and development process. This approach enables continuous improvement and reduces the time to market for vital therapies by helping us to reach our quality, cost and performance targets. Our devices are heavily regulated and each device is manufactured pursuant to strict manufacturing guidelines; each device needs a unique ID that is traced pursuant to FDA and other regulatory requirements.

#### Putting Safety First

We take our responsibility to the people using and benefiting from our products very seriously; safety is always our priority. Our goal is to promote a culture of safety across the organization.

Once products have been used to treat patients, we continue to support patient safety through early identification and mitigation of actual or potential harm. Our Medical Affairs department works closely with the dedicated post-market quality function to promote a culture of safety across Nevro by monitoring customer complaints and evaluating actual and potential safety issues, harm and health risk to patients or users of Nevro products. Our complaint system goes well beyond the minimum regulatory requirements to ensure that feedback from customers and the sales team is used to continuously improve existing products, as well as to enhance new product design.

## Spotlight: Packaging Design

### The Problem

When Nevro first began operations, a single packaging size made sense to simplify the packaging for all products. Over time, it became apparent that the size chosen, while large enough for other items, was bulky and cumbersome to sales representatives and could be streamlined for next-generation products.

### The Prior Benefits

Using a single size for packaging meant more predictability in shipping and logistics during the early stages of our product introduction.

### The Solution

While eliminating packaging isn't a possibility due to regulations and the needs to maintain sterility and cleanliness of product, it was possible to reduce the packaging on a trial basis for next-generation products. The reductions in size translated into a 19.2% reduction in the kit assembly cost. On an annualized basis, the size reduction effort has yielded well over \$100k in cost savings for packaging alone as well as reducing the materials used in the packaging process.

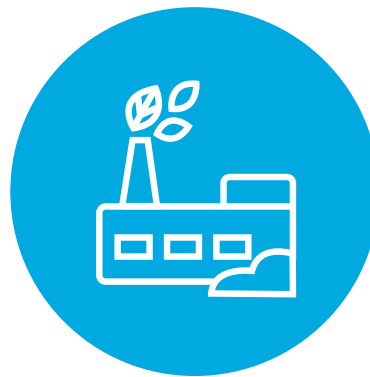


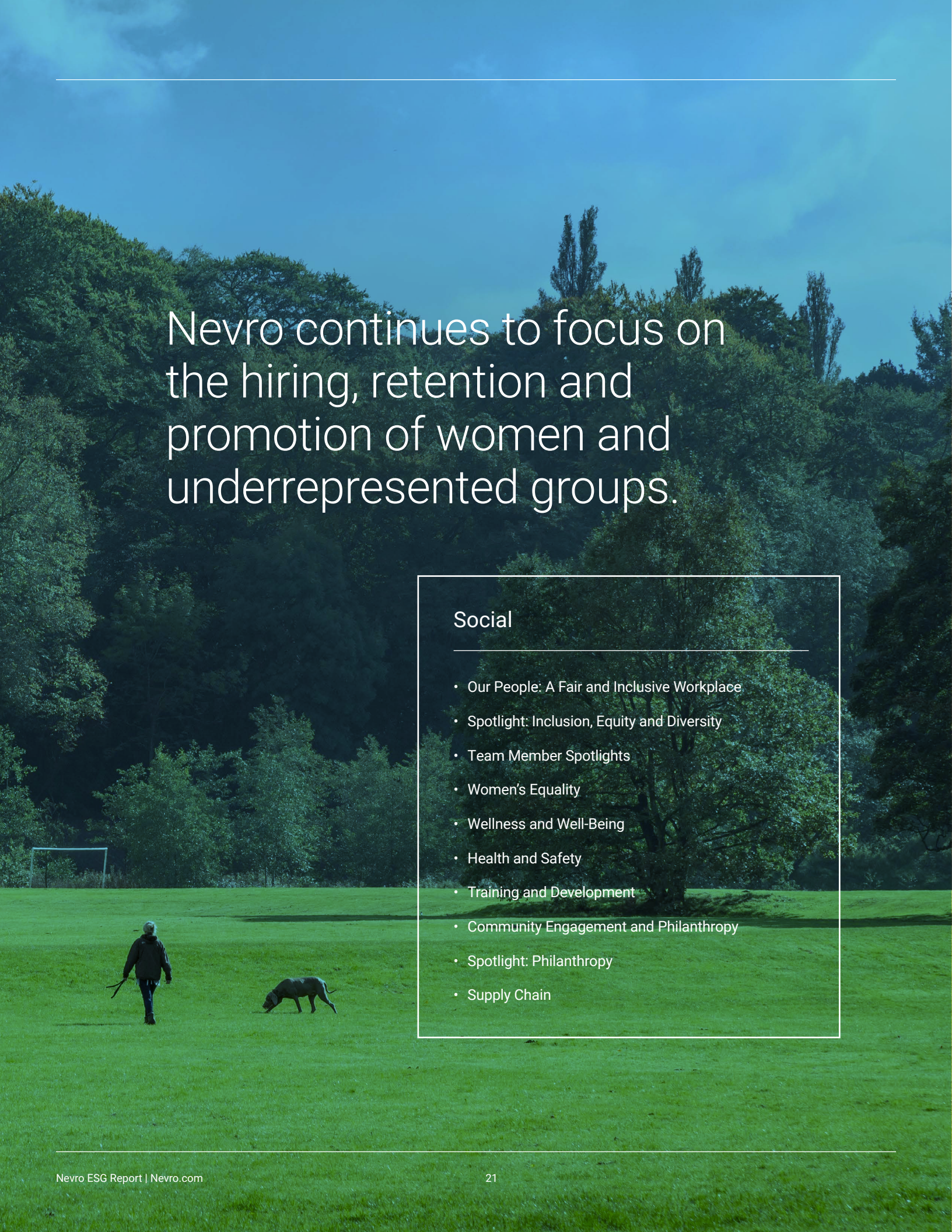
We have always conducted rigorous supplier due diligence to ensure the highest product quality and regulatory compliance of our products.

### Product Manufacturing

Since inception, Nevro has outsourced product manufacturing to third-party suppliers. Though heavy reliance is placed upon third-party suppliers, we have always conducted rigorous supplier due diligence to ensure the highest product quality and regulatory compliance of our products. Some Nevro suppliers are currently single source suppliers, and several supply agreements have been put in place to reinforce our supply chain.

While outsourcing manufacturing served us well as we were gaining commercial traction with our products in the marketplace, in 2020, as part of an initiative to support future growth and stability of supply to our customers and patients, we announced that we will establish our own manufacturing operations in Costa Rica. As part of this announcement, we signed a 10-year lease for a 35,000 square foot manufacturing facility in Costa Rica to support future product requirements. In late 2021, we had the official grand opening of the facility. We expect the new manufacturing facility to be validated and approved in 2022. Until then, and even after our Costa Rica operations are online, we will continue to rely on third-party suppliers for the manufacture and supply of our products.



A person in a dark jacket is walking a dark-colored dog on a large, green grassy field. In the background, there is a dense forest of green trees under a clear blue sky. A white goalpost is visible on the left side of the field.

Nevro continues to focus on the hiring, retention and promotion of women and underrepresented groups.

## Social

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- Our People: A Fair and Inclusive Workplace
- Spotlight: Inclusion, Equity and Diversity
- Team Member Spotlights
- Women's Equality
- Wellness and Well-Being
- Health and Safety
- Training and Development
- Community Engagement and Philanthropy
- Spotlight: Philanthropy
- Supply Chain

**Our People: A Fair and Inclusive Workplace**

At Nevro, we believe our employees are critical to our success. We are committed to a fair and inclusive workplace where all people can contribute to Nevro’s success and are valued for their skills, accomplishments, experience, diversity of background and for their unique perspectives.

Nevro is committed to compliance with all applicable laws prohibiting discrimination in employment. Nevro does not discriminate against its employees or its applicants based on any legally recognized protected class including, but not limited, to: race, color, sex, gender, gender identity, gender expression, sexual orientation, national, ethnic or social origin, ancestry, breastfeeding, pregnancy, childbirth or related medical conditions, disability, citizenship status, family status, religion, creed, age, marital status, genetic information, uniformed service member or veteran status, or any other protected class under federal, state or local law.

Nevro’s equal employment opportunity philosophy applies to all aspects of employment with Nevro including recruiting, hiring, job assignment, training, promotion, job benefits, compensation or other rewards, discipline, and dismissal.

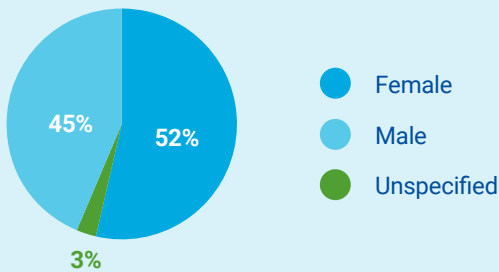
Nevro has implemented policies, procedures and trainings to ensure that any reports of potential or perceived discrimination or harassment are taken seriously and appropriately investigated, remediated and corrected. Nevro encourages employees to report instances of potential or perceived discrimination or harassment to their supervisors, other members of management or human resources. Employees are also made aware of their rights to report complaints of harassment and discrimination to the appropriate government agencies.

Consistent with the Americans with Disabilities Act and similar state and local laws, we work with qualified employees and applicants with disabilities to identify and provide reasonable accommodations to enable them to perform their jobs. Access for people with physical disabilities meets building code requirements for widened walkways, doorways and car parking.

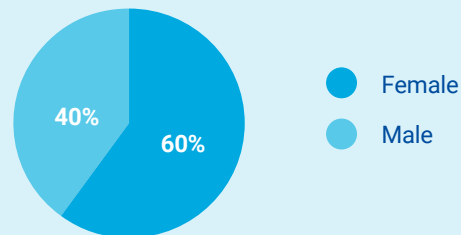
**Nevro continues to focus on the hiring, retention and promotion of women and underrepresented groups as part of our commitment to a fair and inclusive workplace.**

**2021 Workforce Statistics**

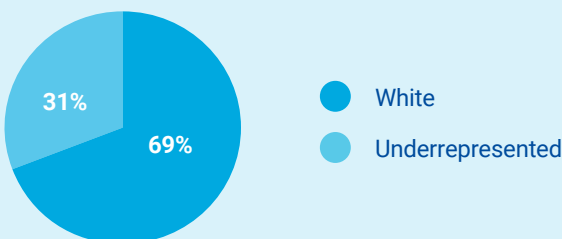
**Global Gender/Workforce**



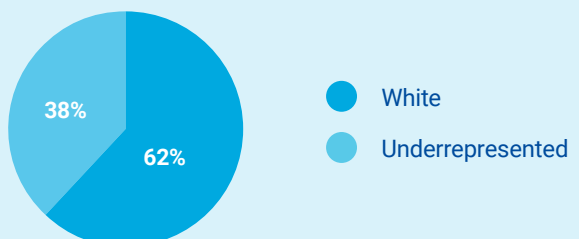
**Global Gender/New Hires**



**U.S. Race and Ethnicity/Workforce**



**U.S. Race and Ethnicity/New Hires**



## Spotlight: Inclusion, Equity and Diversity

At Nevro, we believe that inclusive, equitable and diverse teams are stronger with common purpose. We remain committed to inclusion, equity and diversity and to the important work ahead of us to promote a workplace where everyone feels included and respected. This commitment is embodied in the way we do business and, in our culture, and programs, including our IE&D Program.

### Bloomberg Gender-Equality Index

Nevro is proud to have been named to the 2022 Bloomberg Gender-Equality Index (GEI). The GEI, which includes 418 companies across 45 countries and regions, is a modified market capitalization-weighted index that aims to track the performance of public companies committed to transparency in gender-data reporting. This index measures gender equality across five pillars: female leadership and talent pipeline, equal pay and gender pay parity, inclusive culture, anti-sexual harassment policies and pro-women brand.

Inclusion in the GEI demonstrates Nevro's commitment to transparency in gender reporting and advancing women's equality. Nevro scored at or above global threshold to reflect overall performance across the framework's five pillars. We also achieved a top score for overall disclosure and above healthcare sector averages for female leadership and talent pipeline, equal pay and gender pay parity and anti-sexual harassment policies.

Nevro has implemented several programs and resources to promote diversity and inclusion, including a program designed to recruit women returning to the workforce after taking a career break, paid time off to support family care, access in its facility to lactation rooms and insurance coverage for fertility treatment, among others.



"Our inclusion in this year's GEI is a reflection of our continued commitment to fostering a diverse and inclusive workplace. With women comprising over 50% of our global workforce, gender parity is a top priority for our company. We're thrilled to be recognized for our commitment to nurturing diverse talent, creating an inclusive culture and setting a market standard for disclosing efforts to address gender inequality."

### D. Keith Grossman

Chairman, Chief Executive Officer and President

## Employee Resource Groups

Nevro continues its commitment to IE&D with its Employee Resource Groups (ERGs). These are voluntary and company-sponsored groups that are built on shared interests that help to celebrate, develop and engage our diverse workforce worldwide. ERGs are deeply rooted in and aligned with Nevro's mission, values, goals, business practices and objectives. ERGs also help promote the importance of leadership and the development of future leaders, increase employee engagement, build community at a grassroots level and expand our marketplace reach.

To further progress the IE&D Program, Nevro continues to support two voluntary, employee-led and executive-sponsored ERGs and their sponsored activities. All Nevro employees are encouraged to participate.



### Multicultural Organization Supporting an Inclusive Culture (MOSAIC)

#### Purpose

Focused on the fairness of our workplace, including understanding, accepting and valuing differences between diverse groups of people, including those:

- Of different races, ethnicities, genders, ages, religions, disabilities and sexual orientations.
- With differences in education, personalities, skill sets, experiences and knowledge bases.

#### Objectives

Develop a vibrant and supportive community for multicultural employees.

Serve as a valuable connection and resource for senior leadership and our broader organization.

Contribute to the recruitment, development and retention of multicultural talent.

Identify opportunities to advance the care of diverse patients.

#### Mission-Aligned Activities

Leadership of a company-wide fund-raising campaign for SMASH, an organization dedicated to providing students of color with an intensive science, technology, engineering and math (STEM) education, culturally relevant coursework and access to resources and social capital that allows them to be successful in college and in their careers.



### Women in Leadership

#### Purpose

A community of employees passionate about inclusion, diversity and the career advancement of female employees so that Nevro can maximize its talent and better serve the needs of our patients and customers.

#### Objectives

Foster a dependable, inclusive and collaborative workforce.

Ensure leaders develop, inspire all talent and role model values and increase workforce diversity.

#### Mission-Aligned Activities

A sponsor of The Women in Neuromodulation (WIN@), an organization associated with the North American Neuromodulation Society. Created to educate, inspire and encourage women working in the field of neuromodulation, regardless of medical specialty, to realize their professional and personal goals and to serve the discipline in addressing the issues inherent to training and maintaining a diverse and balanced workforce.

Leadership of a company-wide giving program targeting Dress for Success, an organization that empowers women to achieve economic independence by providing a network of support, professional attire and the development tools to help women thrive in work and in life.



## Team Member Spotlights

In 2021, Nevro sponsored many special events to commemorate IE&D milestones at its headquarters in Redwood City and virtually around the globe through documentary screenings, Team Member Spotlights, Virtual Worldwide trivia, raffles and speaker series.

### Some of these Inclusion, Equity and Diversity milestones included:

- Black History Month
- Lunar New Year
- Women's History Month
- International Day of Women & Girls in Science
- Asian Pacific Heritage Month
- Pride Month
- Juneteenth
- National Hispanic Heritage Month
- Diwali and more

## Ronnie Robinett Regional Sales Director

Meet Ronnie Robinett, a Regional Sales Director, former IE&D Program Manager and MOSAiC ERG's founding member and leader at Nevro. Inspired by the words of Dr. Martin Luther King's "I Have a Dream" speech, Ronnie wanted to live a life that his family would be proud of, and he knew that education was the key.

"I pay tribute to my grandparents during **Black History Month** because of their perseverance and sacrifices that gave me the opportunities to live their wildest dreams. It pleases my grandparents to see my siblings and me get the education that they were not afforded and have successful careers. I owe them so much and have a responsibility to create a path for others to follow behind me."

*#BlackHistoryMonth #NevroMOSAIC*



## Melania Abarca Manager of Materials

Meet Melania Abarca, our Manager of Materials at Nevro Costa Rica. Melania has been doing a tremendous job helping to get our Costa Rica facility up and running.

“No matter where we come from or what we’ve gone through, our heritage stays with us and affects the way we connect with people and see the world.”

*#NationalHispanicHeritageMonth*



### Women’s Equality

To celebrate #WomensEqualityDay, women of Nevro shared some of their favorite sayings and beliefs that make them unstoppable. Here’s to all the incredible women at Nevro!

*#womeninleadership #unstoppabletogether*

“I’ve learned the power of empathy from the strongest women in my life. Connecting with others and leading with compassion are essential to our lives, both personally and professionally. Today, we celebrate those whose vision created a meaningful path forward that benefits all of us.”

### Arian Ellis

Senior Director, Learning and Development

“We need women’s perspectives and leadership in every field, civil engineering, energy, urban design, medicine, transportation, etc. in order to make the world a better place for all of us!”

### Rose Azalde

Principal Clinical Scientist

A culture of engagement propels our diverse, uniquely talented workforce to bring Nevro's purpose, passion and promise to life.

### Wellness and Well-Being

At Nevro, we know that wellness in the workplace means caring holistically for all who choose to work with us.

In October 2021, Nevro hosted a virtual wellness fair for all U.S. and International team members, as well as an onsite wellness fair in the Redwood City headquarters. We also hosted an onsite walk/run/ride for our team members and team members' families. Nevro's Not-Your-Ordinary Wellness Fair had a huge turnout and was a great success. This interactive and educational event — ranging from burpee challenges to chair massages — provided team members with tips on how to incorporate sustainable and healthy habits into their daily lives.

**As part of Nevro's commitment to our people, we make wellness and well-being a priority through fun activities and resources for our employees, including:**

- Weekly virtual yoga classes
- Bi-monthly webinars on various wellness topics including nutrition, healthy eating, restfulness, mental awareness and finances
- Quarterly fitness challenges via our third party "Walker Tracker" and healthy "grab and go" snacks

**In 2021, with the opening of Nevro Costa Rica, we introduced several important wellness benefits specifically for our employees in the Costa Rica facility, including:**

- An employee savings plan
- Subsidized cafeteria and bus transportation
- Paternity/adoption leave
- Marriage leave
- Salary replacement while disabled after a 1-year tenure (for exempt employees)

A culture of engagement propels our diverse, uniquely talented workforce to bring Nevro's purpose, passion and promise to life. As part of our commitment to fostering a positive culture through engagement, we conducted an engagement survey in 2021. We had a 79% participation rate with particularly strong contribution by some teams, including Product Development and Advanced Technologies, Customer Excellence and team members hired within the last six months. **We reviewed the collective results of the survey. Action plans have been and continue to be created with respect to principle areas of feedback, namely our methods of internal communications with our employees and particular concerns around return to office policies for our workforce.** We intend to administer regular updates of this survey throughout the year to monitor trends and to improve the overall employee experience.



### Health and Safety

Nevro maintains accident and injury logs and facility improvement recordings. Since 2019, there have been 14 minor reportable workplace injuries. In 2021, three minor reportable workplace injuries occurred resulting in no lost work days. Since 2019, two days were lost due to minor reportable injuries. No workplace fatalities have been reported to date.

**In 2021, with the opening of Nevro Costa Rica, we introduced several important health and safety programs specifically for our employees in the Costa Rica facility, including:**

- Safety and occupational health program
- Influenza vaccination campaign and COVID prevention training
- Infirmary for employees
- Safety training for chemical management

### Training and Development

Nevro continues to invest in the training and development of all our employees worldwide.

In 2021, Nevro rolled out an IE&D skill-building training program for all people managers, consisting of four modules: Nevro Commitment to IE&D, Importance of Inclusivity, How to Build and Rebuild Trust and How to Become an Effective IE&D leader. Each module consisted of a video message from a Steering Committee leader, learnings from Harvard Business Review and other publications and video and reflection questions. **Nearly 90% of the 150 people managers completed these modules.**

**In addition, nearly 100% of employees completed Nevro's 2021 Code of Conduct recertification, and all managers completed mandatory implicit bias training and anti-harassment training.**

### Community Engagement and Philanthropy

At Nevro, supporting the communities where we do business and where our employees live and work is core to our mission and values. We are proud of the impact our community engagement and philanthropy is making to enable healthier and more equitable lives everywhere, every day.

**To maximize our impact in ways that align with our mission and our ESG strategy framework, we focused our 2021 giving efforts locally, and in areas such as:**

- Diabetes research funding
- Science, technology, engineering and math education (STEM), especially for underprivileged students
- Social and racial equality, particularly in healthcare

Nevro provides all team members with eight hours of paid time each year to volunteer at a charitable organization of their choice. It's part of our broader commitment to support all employees in the volunteering they find meaningful and to support the communities in which our people work.

# Spotlight: Philanthropy

## Tour de Cure

TeamNevro supported the Tour de Cure virtual and headquarters' ride, run and walk event on October 10, 2021, with over 10% of the workforce participating in one way or another and with a donation of almost \$65,000. Along with our expanded indication of 10 kHz SCS for the treatment of PDN, Nevro is committed to supporting the American Diabetes Association's (ADA) mission to prevent and cure diabetes and to improve the lives of all people affected by diabetes.

ADA's Northern California executive director, Alan Kissick declared, "The American Diabetes Association is very grateful to Nevro for its strong support both as a major sponsor and significant new team in our Tour de Cure event. We look forward in years to come to continue building upon our partnership and collaborating to achieve our guiding objective to reduce the burden of diabetes, especially and specifically for so many who are afflicted with one of the most severe, painful and debilitating consequences of the disease - neuropathy."



In 2021, Nevro supported many other charitable organizations through community engagement and philanthropy.

## Family Giving Tree

Nevro is committed to helping our communities in need. Every year, Nevro participates in the Family Giving Tree to deliver joy to children in need in our local communities. Since 2015, Nevro has participated as a Drive Leader for the Holiday Wish Drive.

## Dress For Success (DFS)

Nevro is committed to the empowerment of women. In a letter thanking Nevro for its support, DFS wrote, "Nevro's gift helps women in the community take their first steps toward financial independence." In 2021, Nevro donated over \$15,000 to DFS.

## SMASH Academy

Nevro is committed to building a strong, diverse and socially conscious tech workforce by leveling the playing field through academic learning and experiential engagement for high school and college students. Nevro's contribution helps to provide programming to make STEM accessible, inclusive, equitable and diverse for underrepresented students. In 2021, Nevro donated over \$10,000 to SMASH.

Nevro has also made in-kind donations with approximately 150 laptops to **Court Appointed Special Advocate (CASA)**, **SMASH** and **DFS**, as well as artwork to **UCSF Benioff Children's Hospital**.

### Giving in Costa Rica

Donatapa is a social-environmental project developed by the Costa Rican Accessible Tourism Network with the goal of creating accessibility for individuals with disabilities in a variety of tourism locations throughout Costa Rica. Nevro and other organizations collect plastics for reuse and repurposing into ramps and other accessibility features.

In addition to Donatapa, employees in Nevro Costa Rica continue to engage and support the local communities through volunteering in homeless shelters and supporting families in the local community during the holiday season.

In 2021, Nevro Costa Rica supported the Dona Con Amor organization by bringing presents for the holidays to kids in different areas of Costa Rica.

In addition, Nevro Costa Rica donated essential groceries to support two families with special needs, both from Desamparados de Alajuela.

Nevro Costa Rica continues to support the local communities in need and plans to supplement their current community engagement and volunteering with volunteer work in schools and engaging in social-environmental activities including tree planting and beach clean-up throughout 2022.



## Supply Chain

Nevro manufactures its products with individual components or materials from approximately 100 approved suppliers.

### We champion supplier management and quality through:

- A supplier approval process, including assessment tools that can include on-site or remotely conducted audits according to the assessed risk of the component or service.
- Established standards for supplier communication, responsibilities, quality systems and traceability.
- A supplier requirement to have ISO 9001, ISO 13485 or equivalent quality management system, to be certified by an acceptable third party and to adhere to the applicable standards for electronic components. In some cases, we may approve a supplier that is not ISO 9001 or ISO 13485 certified based on our own audit of their quality systems, with agreed and documented controls.

### Nevro's supply chain contributes to positive outcomes for workers and the communities we impact.

By setting clear and transparent expectations of our suppliers, we work to protect workers and the environment from the negative impacts of our operations.

#### Promoting Responsible Minerals Sourcing


We conduct due diligence aligned with our Statement on Conflict Minerals to source responsibly and collaborate with other stakeholders.

#### Upholding Baseline Expectations for Responsible Conduct

We help protect workers' rights, health and safety through our newly articulated Supplier Code of Conduct across the value chain. This includes raising awareness and fostering accountability for meeting our expectations.

#### Protecting the Environment Where We Manufacture

We work to proactively address climate change through the operations we have begun in Costa Rica.



We care about protecting communities and the environment from the negative impacts of our operations.

Nevro has established a robust team and implemented thorough checks and balances to ensure adherence to high ethics and compliance standards.

## Governance

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- Board of Directors
- Corporate Governance Guidelines
- Global Compliance
- Accountability and Oversight
- Business Integrity
- Ethical Marketing
- Cybersecurity and Data Privacy
- Data Privacy
- Key Policies and Statements
- Asking for Help
- Future Reporting Expectations
- Alignment to Reporting Categories and Standards
- SASB
- TCFD Disclosures



## Board of Directors

Nevro's Board of Directors currently consists of top experts in the medical technology and healthcare industries whose experience, reputations and qualifications offer us and our shareholders best-in-class oversight and governance. Nevro believes that diverse boards are stronger boards. Our Board is currently comprised of three female directors, constituting 30% of our Board membership, and two directors from underrepresented communities. We are committed to not only comply with the applicable laws but also to ensure diversity that will drive the continued growth and maturation of Nevro.

Nevro is committed to sound and rigorous corporate governance practices to promote and sustain long-term stockholder value. Our Board of Directors oversees the corporate governance of Nevro and is supported by independent committees of the Board with responsibility over certain functional areas.

### 10 Member Board

3 Female Directors and 2 Directors from underrepresented communities



### Current and former executive officers and professionals with experience across:

- Medical Devices
- Medical Technology
- Investments



The Board is committed to enhancing both gender diversity and diversity from underrepresented communities.

## Corporate Governance Guidelines

The Board has adopted Corporate Governance Guidelines to ensure that it has the necessary practices in place to review and evaluate business operations as needed and to make decisions that are independent of our management.

### Nevro's Corporate Governance Guidelines intend to:

- Align the interests of directors and management and stockholders, including minimum stock ownership for each of the directors and officers of the Company.
- Set forth the practices our Board follows with respect to Board and committee composition and selection, Board meetings, Chief Executive Officer performance evaluation and succession planning.

A copy of Nevro's Corporate Governance Guidelines is available on our website in the Investor Relations section.

Sound and rigorous corporate governance is a continuing focus of the Board of Directors. Each of the Committees of the Board and the Board of Directors evaluates its respective performance, its respective governing documents, the Board's policies and the Corporate Governance Guidelines on a yearly basis.

For example, in 2019, the Board recommended that its stockholders approve a phased-in declassification of its Board to remove its historic staggered structure and removal of its super majority voting provisions, and implement a majority voting standard for all directors seeking re-election, in order to better align its policies with stockholders' interests. This annual review is supplemented by ongoing advice on current governance trends and education from Nevro's internal and external legal and governance advisors.

### Independent leadership remains an important pillar of our Board leadership structure.

- While Nevro's current Chief Executive Officer presides as Chairman of the Board, the Board has appointed a Lead Director to preside at meetings of the non-management members of the Board when meeting in executive session.
- We believe the combination of the CEO and Chairman role allows consistent communication and coordination throughout Nevro as well as effective and efficient implementation of corporate strategy and is important in unifying our team members behind a single vision.
- The Lead Director provides an important balance between management and non-management directors. The Board believes this leadership structure strikes an appropriate balance between effective and efficient leadership and oversight by non-management directors.





## Global Compliance

Nevro is committed to acting ethically in dealing with its patients, customers, employees, shareholders, partners, suppliers, competitors and communities, as well as complying with all applicable laws in the countries where it operates, including regulations related to anti-kickback, false claims, physician sunshine and product promotion and marketing. This commitment is upheld through our Global Compliance Program (the “Compliance Program”) and our Code of Conduct and Ethics (the “Code”).

### Accountability and Oversight

**The Board of Directors**, along with an internal executive management team consisting of our Chief Executive Officer and other senior executives (the “Executive Compliance Committee”), oversee our Compliance Program.

- The Compliance Program encompasses our Privacy & Security and Anti-Corruption programs.

**The Chief Compliance Officer** oversees an internal compliance team that manages the day-to-day operations of the Compliance Program, with the assistance of external experts.

- This team periodically performs third-party assessments, auditing and benchmarking to strengthen the program.

**The Executive Compliance Committee** meets at prescribed times during the year to receive an update on the state of the Compliance Program and to take any actions necessary to strengthen and improve the program.

- The Board of Directors receives quarterly updates on the Compliance Program, including details on specific compliance matters and other compliance metrics.

**The Privacy & Security Committee** is tasked with:

- Coordinating and directing key privacy and security matters that affect Nevro and its stakeholders.
- Recognizing the criticality of protecting patient, employee and company data.
- Ensuring the protection of data and compliance with international, local, state and federal privacy laws and regulations, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
- Oversight of the implementation of Nevro’s Privacy and Security programs and data privacy impact assessments.
- Development of strategies, policies, procedures and training activities.
- Ensuring critical security incidents and/or breaches, and subsequent remediations, are reported to the Chief Compliance Officer and the Executive Compliance Committee.

## Business Integrity

An effective ethics and compliance program must be built upon a culture of honesty, accountability and transparency that is modeled by all levels of management and extends globally across the company. Nevro expects that our leaders, employees, distributors and agents act with integrity, commit to comply with regulation and industry guidelines, seek input for questions and concerns and collaborate on constantly improving how we conduct our business.

All of our directors, officers, employees, distributors and agents (“Representatives”) are guided by our Code, which is published in four languages on our corporate website. While the Code is not intended to be a comprehensive legal guide and cannot address all situations that may arise, it provides:

- A summary of the compliance and ethical standards we expect of our Representatives as they deliver on our promise to improve lives of patients worldwide.
- Directives on reporting and investigating concerns and the consequences of violations of the Code or applicable laws, regulations and industry guidelines.
- Best practices on conflicts of interest, protecting confidential information and personal data, ethical interactions with government officials and healthcare providers and compliance with financial reporting, insider trading and other financial market regulation.

Our commitment to ethics is part of everything we do, and we take specific steps to ensure our employees understand how to achieve business objectives with transparency, honesty, and integrity.

We maintain and promote our Code, which sets forth our philosophies regarding ethical business practices and contains guidance specific to anti-corruption, anti-bribery, ethical promotion and marketing practices, among many other topics.

Upon hire and annually thereafter, employees are required to take a Code training course, which provides examples and hypotheticals on how the concepts can be applied to daily business practices. In 2021, this course was taken and completed successfully by nearly 100% of our current employees.

We maintain various additional policies that provide further detail on the topics covered in our Code. Several of these are also supported by online training modules that employees take when they join Nevro and on a regular basis thereafter.

We maintain a process by which all marketing and promotional materials are reviewed to ensure that claims are accurate, supported by reliable data and consistent with the approved product labeling.

We provide a compliance hotline that is available internally and externally to employees and third-parties whereby they may report compliance concerns to us. Reporting can be done anonymously at the discretion of the employee

Many employees also received additional guidance materials and competency training for European General Data Protection Regulation (GDPR), HIPAA, California Consumer Privacy Act (CCPA), cybersecurity training and periodic response testing, localized industry guidelines on ethical interactions with healthcare providers and reporting adverse events.

Nevro expects that our leaders, employees, distributors and agents act with integrity, commit to comply with regulations and industry guidelines, seek input for questions and concerns and continually collaborate on ways to improve how we conduct business.

## Ethical Marketing

Nevro is dedicated to the improvement of patient care by providing innovative, high quality, cost-effective healthcare technology.

Nevro is subject to laws and regulations designed to protect patients and consumers, improve the quality of healthcare services and help eliminate fraud and improper influence on medical judgment. Our products are closely regulated by government agencies, health ministries and regulatory authorities worldwide. We prioritize integrity as a fundamental aspect of our sales and marketing practices. Nevro is committed to conducting its business ethically and in compliance with all applicable laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA) and other laws that prohibit improper payments to obtain a business advantage. In addition, as a medical products manufacturer, Nevro has the added responsibility of ensuring that representations regarding our products are consistent with the approved label. Our policies ensure employees communicate clearly and accurately so that customers understand the features and benefits, but also the limitations, of our products. Customers and patients, as well as our business partners and suppliers worldwide, rely on Nevro for honest and accurate communication.

## Cybersecurity and Data Privacy

We are committed to protecting the privacy and security of our information assets, especially the data that our customers and patients entrust to us. Nevro has implemented an information security program, comprising multiple layers of people, processes and technologies. This approach is aligned with internationally recognized industry standards for security, such as those from the National Institute of Standards and Technology (NIST) and is deployed in a centralized global fashion to ensure a consistent approach to security across the organization.

### Key areas of focus

- Operational security
- Information asset management
- Information risk management
- Third-party risk and management

Nevro's Information Security team monitors and implements procedures to manage our cybersecurity and data governance risks. Identified cybersecurity risks are addressed strategically as part of the cybersecurity maturity program. The Executive Committee oversees cybersecurity risk. The management team provides an update on cybersecurity risk and related strategic maturity efforts to the Executive Committee.

Nevro has an incident management and issue response process based on the NIST Security Incident. We test this process regularly.

We are focused on managing the risks of third-party events. We deploy vendor cybersecurity due diligence and privacy assessment programs to reduce our risks via our partners and suppliers.

## Data Privacy

The Nevro Privacy program is managed by a designated privacy professional in close cooperation with our IT Security and Legal and Compliance functions. Nevro's Privacy program aims to protect privacy with an effective framework of policies, procedures, and training that addresses the management of personal data.

Our Privacy Policy establishes global requirements for the fair and lawful collection, processing, handling, and protection of personal data by and on behalf of Nevro. Protecting personal data is crucial to preserving our stakeholders' trust in Nevro, protecting our brand and reputation, and supporting product and data strategies. We continually monitor compliance with privacy-related laws in each of our markets around the globe, such as HIPAA, GDPR in Europe, CCPA and other national privacy and cybersecurity laws.

## Key Policies and Statements

We are committed to doing business the right way, without exception.

Nevro does not tolerate illegal or unethical behavior in any form and emphasizes importance of speaking up, respecting human rights and fair labor standards, avoiding conflicts of interest, managing confidential information properly, maintaining accurate books and records, along with the importance of adhering to policies and procedures.

We believe that all people should be treated with dignity and respect and recognize the importance of protecting human rights. We respect workers' rights including but not limited to, equal opportunity and freedom from discrimination. We comply with the employment and human rights laws, protection from child labor, modern slavery or human trafficking as covered in the UK Modern Slavery Act of 2015.

Building a strong company culture that promotes trust is a shared responsibility we take seriously.

We also monitor our engagements with healthcare providers to ensure they are limited to appropriate educational and scientific objectives, and we participate in global sunshine reporting in those regions in which we do business to ensure these relationships are transparent to patients, customers and regulators. Our employees have numerous channels and opportunities to learn, ask questions and share concerns they may have throughout the year.

### Key policies and statements

- Code of Conduct and Ethics
- Supplier Code of Conduct
- Anti-Corruption Statement
- Anti-Slavery Statement
- Conflict Minerals Statement
- Environmental Statement
- Privacy Policy
- Statement on Human Rights
- Statement on Interactions with Healthcare Professionals and Organizations

## Asking for Help

Team Members are required to report any known or suspected violation to the Chief Compliance Officer (directly or via [compliance@nevro.com](mailto:compliance@nevro.com)), a supervisor or Human Resources. Any supervisor or Human Resources team member receiving such report must immediately advise the Chief Compliance Officer.

Nevro has also arranged for a Compliance/Ethics Hotline for receiving such reports, which can be reached at [www.nevro.ethicspoint.com](http://www.nevro.ethicspoint.com). This 24/7 multilingual external reporting service is available for employees or others who want to report issues through a neutral third-party or remain anonymous.

We take seriously and investigate all credible reports of any potential legal or policy violations, and such investigations are conducted confidentially and with oversight by Nevro's Whistleblower Committee. It is against Nevro policy to retaliate in any manner against any person who has in good faith reported a suspected violation of the Code or who has participated in an investigation.

### Future Reporting Expectations

In this second year of reporting, we have added specific metrics for reporting. Guided by the sustainability reporting standards set forth by the SASB, our approach to ESG factors address areas that matter to our customers, investors, employees and the communities we serve.

In 2023 and beyond, we will continue to refine our measurements and provide additional information about our goals and efforts to address ESG responsibilities. This may include the introduction of new metrics in alignment with future developments of the International Sustainability Standards Board (ISSB) and other key metrics.

### Alignment to Reporting Categories and Standards

SASB Index / Table 1. Sustainability Disclosure Topics & Accounting Metrics

Category	SASB Number	Description of Metric	Company Response
AFFORDABILITY & PRICING	HC-MS-240a.1	Ratio of weighted average rate of net price increases (for all products) to the annual increase in the U.S. Consumer Price Index	No price increases have occurred to date.
	HC-MS-240a.2	Description of how price information for each product is disclosed to customers or to their agents	<p>Nevro regularly interacts in the U.S. with physician specialties involved in SCS treatment decisions, including interventional pain specialists, neurosurgeons and orthopedic spine surgeons. In addition, Nevro interacts third-party payors and hospital's administrators.</p> <p>Additionally, Nevro interacts with physician specialties involved in PDN treatment decisions, including primary care physicians, endocrinologists, internal medicine and podiatrists, to create awareness of 10 kHz Therapy to treat PDN patients.</p> <p>We sell in Europe and Australia through a combination of our direct sales force and a network of sales agents and independent distributors.</p> <p>Nevro products are sold through contracts with customers, both within and outside the United States. Some of these contracts represent one-time product purchases and others represent long-term pricing agreements that offer discounts for volume purchases and otherwise place limits on our ability to increase prices. Both in the U.S. and internationally, hospitals and other customers have joined purchasing entities, such as group purchasing organizations, integrated delivery networks and public contracting authorities, to enhance purchasing power.</p>

## Alignment to Reporting Categories and Standards (continued)

SASB Index / Table 1. Sustainability Disclosure Topics &amp; Accounting Metrics

Category	SASB Number	Description of Metric	Company Response
PRODUCT SAFETY	HC-MS-250a.1	Number of recalls issued, total units recalled	0
	HC-MS-250a.2	List of products listed in the FDA's MedWatch Safety Alerts for Human Medical Products database	0
	HC-MS-250a.3	Number of fatalities related to products as reported in the FDA Manufacturer and User Facility Device Experience	0
	HC-MS-250a.4	Number of FDA enforcement actions taken in response to violations of current Good Manufacturing Practices (cGMP), by type	0
ETHICAL MARKETING	HC-MS-270a.1	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	\$0. When public disclosure criteria are met, monetary losses as a result of legal proceedings associated with false marketing claims are included in our December 31, 2021 Annual Report, Item 3, Legal Proceedings pg. 74.
	HC-MS-270a.2	Description of code of ethics governing promotion of off-label use of products	Nevro's Code of Conduct and Ethics addresses the need for caution with regard to off-label use of products. Additionally, the company's handbook, "Interactions with U.S. Healthcare Professionals", describes the company's code of ethics governing promotion of off-label use and compliance with healthcare fraud and abuse laws. Nevro may only market and promote its products for uses consistent with the approved labeling from regulatory authorities such as FDA and CE marking in Europe.
PRODUCT DESIGN & LIFECYCLE MANAGEMENT	HC-MS-410a.1	Discussion of process to assess and manage environmental and human health considerations associated with chemicals in products, and meet demand for sustainable products	Nevro has begun a sustainable packaging initiative described in this ESG report on page 19.
	HC-MS-410a.2	Total amount of products accepted for takeback and reused, recycled, or donated, broken down by: (1) devices and equipment and (2) supplies	N/A



## Alignment to Reporting Categories and Standards (continued)

SASB Index / Table 1. Sustainability Disclosure Topics &amp; Accounting Metrics

Category	SASB Number	Description of Metric	Company Response
SUPPLY CHAIN MANAGEMENT	HC-MS-430a.1	Percentage of (1) entity's facilities and (2) Tier I suppliers' facilities participating in third-party audit programs for manufacturing and product quality	<p>We champion supplier management and quality through:</p> <ul style="list-style-type: none"> <li>• A supplier approval process, including assessment tools that can include on-site or remotely conducted audits according to the assessed risk of the component or service.</li> <li>• Established standards for supplier communication, responsibilities, quality systems and traceability.</li> <li>• A supplier requirement to have ISO 9001, ISO 13485 or equivalent quality management system, to be certified by an acceptable third-party and to adhere to the applicable standards for electronic components. In some cases, we may approve a supplier that is not ISO 9001 or ISO 13485 certified based on our own audit of their quality systems, with agreed and documented controls.</li> </ul>
	HC-MS-430a.2	Description of efforts to maintain traceability within the distribution chain	Nevro devices are heavily regulated and each device is manufactured pursuant to strict manufacturing guidelines; each device needs a unique ID that is traced pursuant to FDA and other regulatory requirements.
	HC-MS-430a.3	Description of the management of risks associated with the use of critical materials	Nevro pays attention to the use of conflict minerals in the supply chain and reports on conflict minerals as described in the Form SD filed on May 24, 2021.
BUSINESS ETHICS	HC-MS-510a.1	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	\$0. When public disclosure criteria are met, monetary losses as a result of legal proceedings associated with false marketing claims are included in our December 31, 2021 Annual Report, Item 3, Legal Proceedings pg. 74.
	HC-MS-510a.2	Description of code of ethics governing interactions with healthcare professionals	Nevro's Code of Conduct and Ethics addresses the need for clear conduct in interactions with healthcare professionals. Additionally, the company's internally available handbook, "Interactions with U.S. Healthcare Professionals", describes the company's code of ethics governing relationships with healthcare professionals.

## TCFD Disclosures

Our Board of Directors and Executive Leadership team oversee and manage our environmental risks.

### Governance

#### Board Oversight

Our Board of Directors has ultimate oversight of environmental risks including those related to energy use, carbon emissions and water resources. The Board's Nominating and Corporate Governance Committee is responsible for reviewing and providing guidance on the company's climate change-related activities and approach as part of its wider sustainability oversight.

#### Management Oversight

We are developing our approach to ensure appropriate governance of sustainability, including environmental topics, by reporting and working toward goal setting in an upcoming report. Our ESG Management Committee is responsible for identifying and managing Nevro's ESG impacts. This senior management team plans to discuss risks and opportunities related to environmental issues and how to apply policies and strategies to address those in each aspect of the business.

### Strategy

We are aware of the business risks from climate change, and we are aware of environment-related risks and opportunities that may impact our business over the short, medium and long-term. The nature of these risks depends on both the physical aspects of climate change as well as market regulations.

#### Our identified risks include the following:

##### Regulatory Risks

We could be impacted by regulatory risks such as potential future carbon disclosure and compliance requirements. Possible carbon tax or regulatory incentives to encourage the use of renewable energy could affect energy costs. Regulatory action can also include pressure to reduce the carbon footprint of specific medical devices, as well as a greater focus on environmental considerations in manufacturing and responsible procurement.

##### Physical Risk

The physical aspects of climate change can have an impact on our ability to continue operations. We regularly assess how we might be influenced by potential business disruption that could occur under extreme weather and natural disasters. These risks and responses are reviewed as part of an annual risk evaluation conducted by our Internal Audit team, the results of which are presented to our Board of Directors.

##### Risk Related to Resource Use

There is increasing scrutiny on the use of water in manufacturing and the amount of plastic waste. Pressure from regulators, consumers and other stakeholders to find alternatives and/or green solutions to reduce our use of natural resources are escalating. We continue to look for ways to address these issues in our R&D process and by continuing to explore developing best practices within the industry.

#### There is opportunity to reduce costs and support reduction goals of partners.

Cost savings for Nevro and our customers could be achieved through actions such as efficient energy usage and reducing our use of raw materials in both device manufacturing as well as packaging. Additionally, we recognize that energy consumption throughout our supply chain has implications for climate change and product costs. As a result of these insights, Nevro has begun migrating a significant portion of production to an owned Costa Rica green manufacturing site and has engaged in packaging reduction initiatives to reduce resources used in packaging.

### Risk Management

Our Senior Leadership team and Board of Directors are focused on managing and mitigating various risks to our business and financial performance, including environmental risks. Such risk management topics are reviewed and discussed on a regular basis among our leadership team across the entire organization. Consideration of such risks is implemented as part of operating and investment decision-making process in the business.

### Metrics & Targets

We continue to refine our approach and plan to monitor and report our estimated greenhouse gas emissions, beginning in the first year of our full Costa Rica manufacturing activities, in the report covering 2023.

**For comments or questions related to this ESG Report, contact:**

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