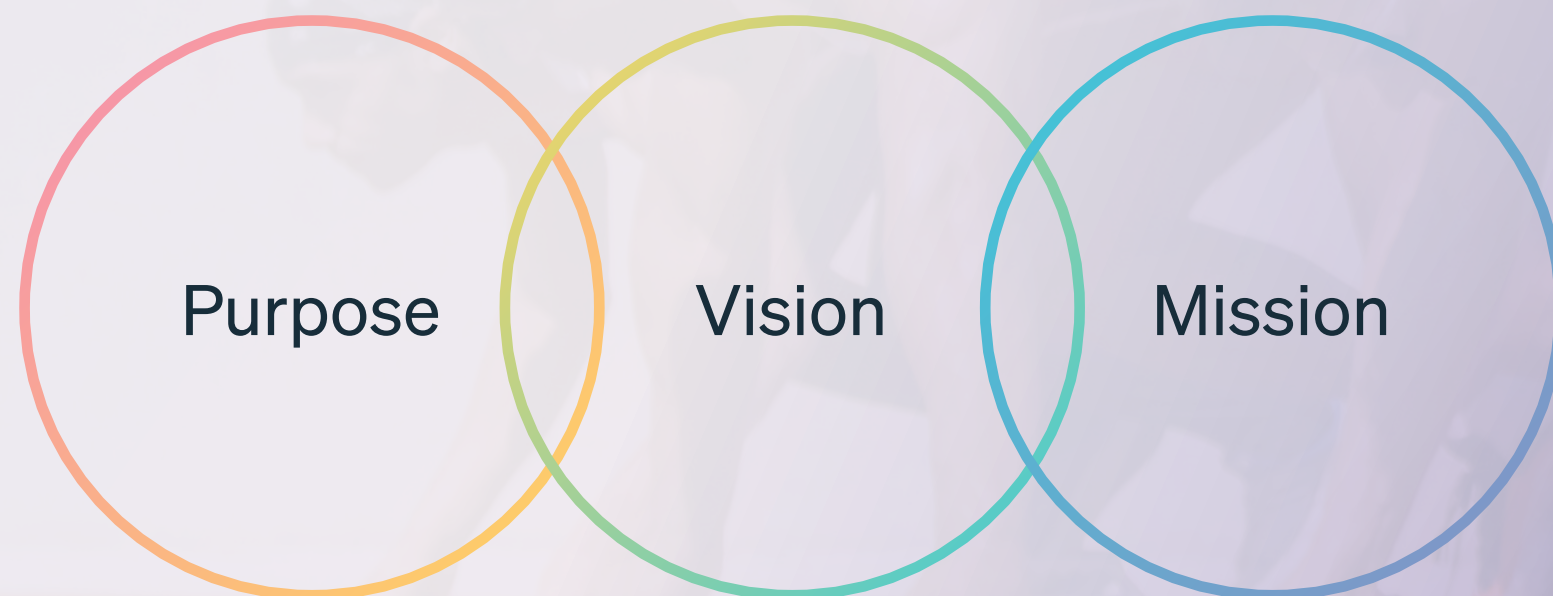


iRHYTHM<sup>®</sup>

# Code of Conduct

Doing the Right Thing is Our Thing.



## Table of Contents

Introduction .....	3	Truthful Advertising + Marketing .....	14	Social Media .....	22
A Message from Our CEO .....	3	Safe, High-Quality Products + Services .....	15	Interactions with Government Officials .....	22
Purpose + Vision + Mission .....	4	Research + Development .....	15	<b>Our Commitment to Ethics + Integrity .....</b>	<b>23</b>
<b>Our Values Guide Our Actions .....</b>	<b>5</b>	Third Party Management .....	15	Conflicts of Interest .....	24
Why We Have a Code .....	7	Waiver Under Appropriate Circumstances .....	15	Preventing Bribery + Corruption .....	24
The Code Applies to All .....	8	<b>Our Commitment to Being a Great Place to Work ...</b>	<b>16</b>	Engagements with Healthcare Providers (HCPs) .....	24
What's Expected of Us .....	8	Diversity, Equity, Inclusion + Belonging .....	17	Business Courtesies .....	25
Training + Education .....	9	Prohibited Discrimination + Harassment .....	18	Responding to Legal + Regulatory Inquiries .....	25
Common Sense .....	9	Equal Employment Opportunities .....	18	Insider Trading .....	25
Important Role of Managers .....	9	Environmental Health + Safety in the Workplace .....	19	Maintaining Accurate Books + Records .....	26
Open Lines of Communication + Raising Concerns .....	10	Preventing Violence .....	19	Fair Competition .....	26
No Retaliation .....	10	<b>Our Commitment to the Public .....</b>	<b>20</b>	Trade Compliance .....	26
The Integrity Hotline .....	11	Human Rights .....	21	Billing + Reimbursement .....	26
<b>Our Commitment to Our Customers .....</b>	<b>12</b>	Environmental Protection .....	21	<b>Our Commitment to Raising Concerns + Issues .....</b>	<b>27</b>
Excellence in Quality .....	13	Volunteerism + Community Involvement .....	21		
Data Privacy + Security .....	13	Prohibiting Substance Abuse .....	21		
Protecting Assets .....	14	Charitable + Political Activities .....	21		
Cybersecurity Measures .....	14	Media + Public Relations .....	22		



## A Message from Our CEO

Dear Colleagues,

Welcome to iRhythm. iRhythm is a leading digital health care company that creates trusted solutions that detect, predict, and prevent disease. Our vision is to deliver better data, better insight, and better health for all. Our ability to achieve this vision starts and ends with a clear purpose and shared mindset. Our value system encompasses our purpose, competencies, and strategy. iRhythm has an underlying and unwavering commitment to the principles of integrity, accountability, inclusion, leadership, and transparency outlined in the Code of Conduct.

The Code is based on our values and designed to guide our choices. We all must act with integrity and conduct our business honestly – and hold each other accountable to do the right thing. Our Code encourages us to engage in ongoing dialogue about the choices we make every day and helps us make the right decisions. Our Code does not have all the answers, but it can help raise awareness of the rules and regulations that we might not have known or understood, and it points us all in the right direction for where to find assistance.

I encourage you to read the Code in detail and ask questions if you do not understand what something means or how you should behave. I also ask that you raise issues or concerns if you believe in good faith that the Company or someone with whom you work may be violating our Code, a policy, or the law. Moreover, I expect our managers to continue to support an environment where speaking up is welcomed and concerns are taken seriously. Asking questions and raising concerns is the only way that we can truly build and maintain a culture of integrity at iRhythm.

Together, we hold ourselves and each other accountable.

Best,

A handwritten signature in black ink, appearing to read 'Quentin Blackford'. The signature is fluid and stylized, with a large 'Q' and 'B'.

**Quentin Blackford**

Chief Executive Officer

## Purpose + Vision + Mission

### Our Purpose

(Why we exist)

To set new standards for the diagnosis of cardiac arrhythmias.

### Our Vision

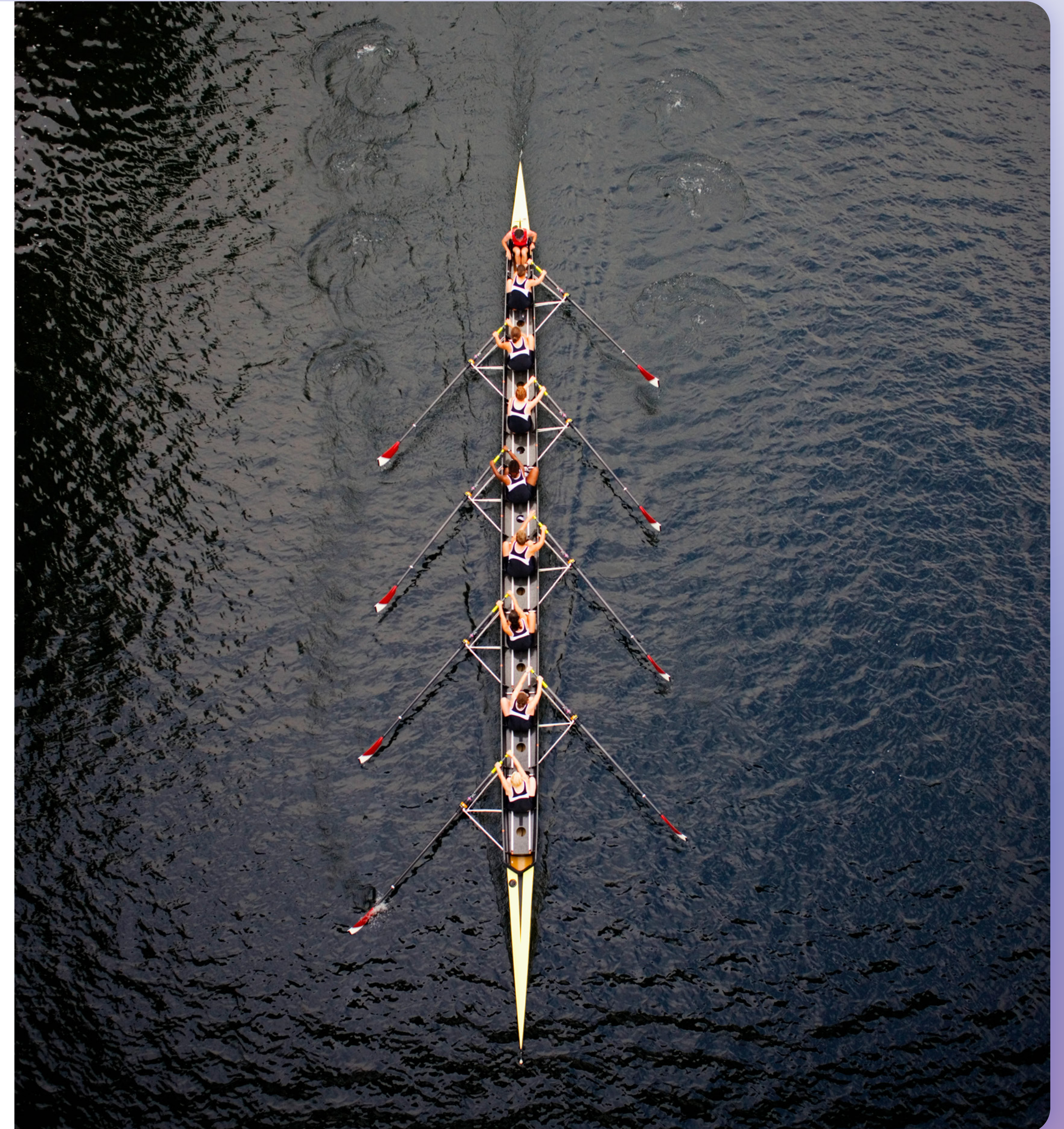
(Where we aim to go)

To provide better data, better insight, and better health for all.

### Our Mission

(What we do to achieve our vision)

To boldly innovate to create trusted solutions that detect, predict, and prevent disease.



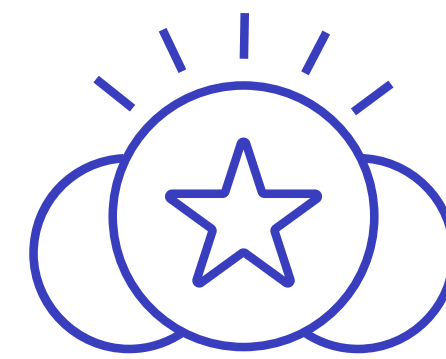
---

# Our Values Guide Our Actions



## Our Values

At iRhythm (“iRhythm” or the “Company”), our values guide how we accomplish our mission and how we treat each other and those we serve. The Company’s mission is to boldly innovate to create trusted solutions that detect, predict, and prevent disease. The Company maintains five core values to guide its mission:



### Lead with Integrity

**Doing the right thing is our thing.**

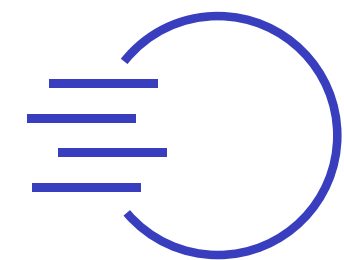
- Build trust
- Hold ourselves to the highest standards of ethics
- Act with transparency
- Be accountable



### Solve for the Patient

**Improving the lives of patients is our passion.**

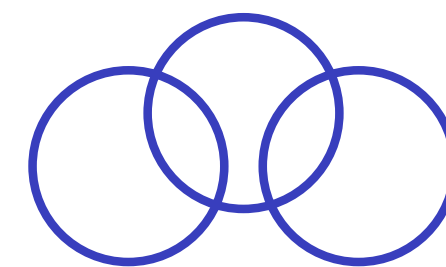
- Put patients first
- Deliver high-quality results
- Consider customer needs



### Think Big, Go Fast

**Achieving our vision requires bold action without compromising quality.**

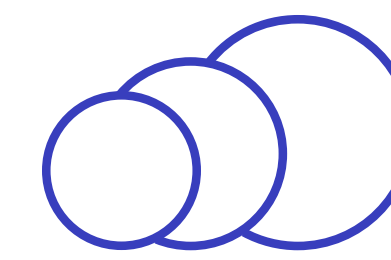
- Be open to new ideas
- Take intelligent risks
- Act with a sense of urgency
- Learn from failure



### Collaborate to Win

**Prioritizing collective success delivers astounding results.**

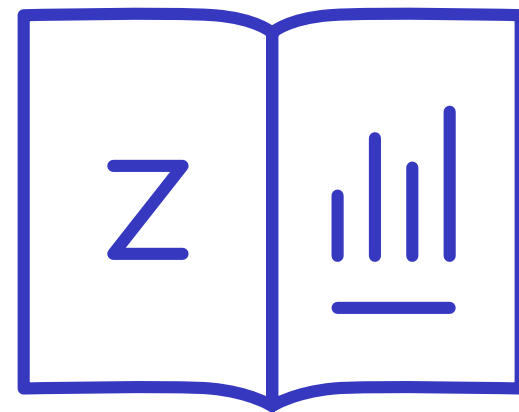
- Think holistically and strategically
- Develop relationships proactively
- Work as one team



### Strive for Better

**Immense possibility exists at iRhythm.**

- Embrace change
- Pursue opportunities for growth
- Seek diverse perspectives



## Why We Have a Code

At iRhythm, honest and ethical conduct is critical to the Company's success. **The Code of Conduct (the "Code")** has been developed to provide you with the guidance and access to resources needed to operate with unquestionable integrity. The Code is designed to deter wrongdoing and to promote:

- Honest and ethical conduct;
- Compliance with applicable laws, rules, and regulations;
- Prompt internal reporting of violations of the Code;
- Accountability for adherence to the Code; and
- Full, fair, accurate, timely, and understandable disclosure in our reports and public communications.

**Our commitment** to the Code helps ensure that all aspects of the Company's worldwide business are compliant with the financial, legal, and ethical standards in the industry. It is important for all of us to read, understand, and follow the Code. We are all accountable for conducting ourselves in a manner consistent with the Code, as well as the laws and regulations of the countries in which the Company conducts business. We expect each person at every level of the Company to follow the Code and to maintain the highest ethical and legal standards.

This includes our employees, managers, directors, officers, and anyone conducting business on iRhythm's behalf, such as agents, distributors and sub-distributors, sales agents, contractors, consultants, temporary staff, vendors, and other third-party representatives ("Third Parties"), regardless of location (collectively, "Personnel" or "we," as applicable).

Our commitment to ethical and lawful behavior is at the core of the Code, and we continually strive to uphold the highest ethical standards. Importantly, the Code goes beyond this commitment to act ethically and lawfully. It also governs the way we interact with each other, our customers, and the public. The following **principles** should **guide** our behavior:



The Code also sets forth general policies and procedures that apply to each of us as Company Personnel. The Code is not intended to replace or conflict with any other Company policy or procedure. However, to the extent the Code conflicts with another policy or procedure, the Code governs. Where there is a difference between the Code and the terms of an applicable law or regulation, we are expected to adhere to the most stringent requirement consistent with the Code.

## The Code Applies to All

The Code applies to all iRhythm subsidiaries and affiliated companies and establishes the framework in which we interact with each other and with customers, suppliers, competitors, government agencies, and the public to ensure that we fulfill our legal, professional, and ethical obligations. It applies to all Company Personnel, regardless of location. We have an obligation to read, understand, and conduct ourselves in a manner consistent with the Code and other policies.



## What's Expected of Us

We must comply with the Code and with all Company policies. If we fail to do so, we may face disciplinary action, including possible termination. Any supervisor, manager, officer, or director who is aware of any violation and does not promptly report and correct it may be subject to similar consequences. In appropriate circumstances, the Company will consider taking legal action or referring matters to public law enforcement authorities for possible prosecution. To demonstrate the Company's commitment to abide by the Code, iRhythm requires Company Personnel to certify their adherence to the Code upon hire. Certification is required annually thereafter.

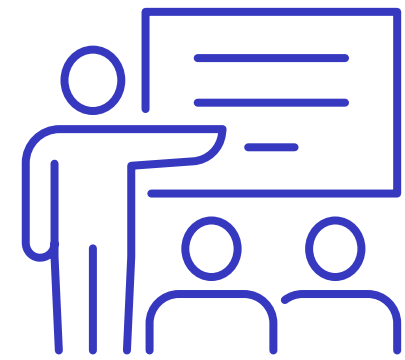
**Q:** Different countries have different laws, regulations, and customs. Does the Code apply to everyone globally?

**A:** Yes. The conduct established in this Code applies to iRhythm Personnel and anyone who conducts business on behalf of iRhythm worldwide. If a local custom, culture, or law contradicts any of the standards of behavior set forth in this Code, you should ask a member of the Compliance & Ethics Team for guidance. As a general matter, where the Code is stricter than a local law or custom, you should rely on the guidance provided in the Code.



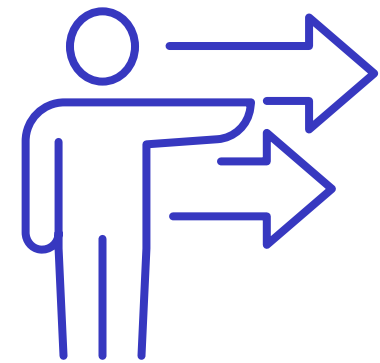
## Expectations of Company Personnel:

- Read, understand, and abide by the requirements in the Code and policies.
- Embrace the Company's commitment to ethics and integrity.
- Ask questions and seek guidance when unsure how to handle any business situation.
- Report any violations of the Code immediately (refer to the Resources section for additional guidance).
- Do your part in enforcing compliance with the Code.
- Cooperate truthfully with any investigations.
- Foster a culture that prevents retaliation and never retaliate against another employee for raising a question or reporting what they believe is a violation of the Code, Company policy, or the law.
- Contact your Manager, Human Resources, a Compliance & Ethics Team member, or the Integrity Hotline with any questions.



## Training + Education

We believe that continuing education and training contributes to the Company's success and compliance with the complex series of laws, rules, regulations, and guidelines that govern the Company. Accordingly, Company Personnel must complete ongoing training to ensure compliance with the Code, Company policies and applicable legal requirements in countries in which the Company conducts business. Failure to certify and/or complete required and mandatory training in a timely manner may result in disciplinary action.



## Common Sense

The Code helps guide how we perform our daily job duties, but it cannot address every challenging situation that may occur in the workplace. When in doubt as to whether an activity is proper, you should seek guidance from your Manager, Human Resources, or a member of the Compliance & Ethics Team.



## Important Role of Managers

All iRhythm Personnel are held to the same compliance and ethical standards, regardless of position in the Company. Individuals in management and leadership positions are expected to go one step further in upholding the Code because they can strongly influence the culture of Company teams and encourage others to "do the right thing." Managers, supervisors, and leaders should clearly demonstrate their commitment to the standards and principles in the Code and help create an environment where integrity is expected, ethical behavior is the norm, and individuals feel comfortable discussing questions or concerns without fear of retaliation. Managers are expected to understand the Code, effectively communicate its guidelines, and answer clarifying questions. Escalate all reported concerns or Code violations immediately.

Managers are required to take all reported concerns seriously and create an environment where employees feel comfortable discussing questions and issues. Managers also must handle all reported concerns or violations of the Code (even if it is not an illegal act, etc.) in strict confidence and escalate immediately to a member of the Compliance & Ethics Team.



## Managers, it is your responsibility to:

- Talk about our Code with your team and clarify how our ethical standards affect the way we do business.
- Encourage people to come forward with concerns.
- Incorporate ethical and compliant conduct when evaluating employee performance.
- Promote the discussion of compliance as a regular part of conversation at the Company.
- Take action quickly if there is suspected violation of law or the Code.
- Immediately escalate all reported concerns or Code violations to a Compliance & Ethics Team Member.

## Open Lines of Communication + Raising Concerns

We have a shared responsibility to maintain an environment of accountability and clarity. It is imperative that we maintain open lines of communication. This includes maintaining an “open door” policy where individuals are encouraged to ask questions, present ideas, and voice concerns. Managers at all levels of the organization are required to maintain an “open door” environment, and all Company Personnel are encouraged to raise concerns with their Manager. iRhythm trusts – and expects – you to speak up if you see or suspect a violation of the law or the Code.

iRhythm takes all allegations of misconduct seriously and, where there is sufficient information provided, will investigate any report of potential violations of the Code, Company policy, or the law. All Company Personnel are required to cooperate with all Company investigations when asked. If you are asked to take part in an investigation, you must provide complete and truthful information during the investigation process. You are also required to keep any investigation and related discussions confidential.

Our Global, Risk, and Integrity (“GRI”) Department is responsible for the administration of the Code and reports to the Chief Risk Officer and Chief Compliance Officer. Upon completion of an investigation, a Compliance & Ethics Team Member will analyze investigation results with other members of executive management to determine the appropriate course of action. Responses may include remedial action (such as training, enhanced controls, coaching or communication) or disciplinary action. Disciplinary action involving potential termination of employment is reviewed by the Chief Compliance Officer and Head of People and Culture.

## No Retaliation

Anyone who, in good faith, seeks advice, raises a concern, or reports potential violations of the Code (or any Company policy, law, rule or regulation) will be protected against retaliation. It is a violation of the Code to discipline, discriminate, take any adverse employment action, or retaliate against anyone who reports a concern in good faith, regardless of whether such information is ultimately proven correct. The Company’s commitment to protect against retaliation extends to anyone who cooperates with any Company investigation or inquiry.

If you believe that you or another individual has been retaliated against for raising a question, seeking guidance, voicing a concern, reporting misconduct, or participating in an investigation, you must notify a member of the Compliance & Ethics Team or Human Resources immediately. You also may use the Company’s Integrity Hotline to anonymously report retaliation, where permitted by local law.

## What is retaliation?

An adverse action that can take various forms such as verbal or written threats, mistreatment, harassment, exclusion from regularly attended business meeting(s), negative performance reviews, demotion, suspension, reduced compensation, denial of benefits or promotions, or termination.

## The Integrity Hotline

Everyone including but not limited to iRhythm Personnel, Healthcare Professionals, Suppliers, Patients, and even the general public has access to the iRhythm Integrity Hotline and may anonymously report any concerns, where permitted by local law. However, disclosing your identity allows iRhythm to conduct a more expeditious and thorough investigation. The Integrity Hotline is provided by an independent third party, so your anonymity will be maintained unless you choose to identify yourself or your identity becomes known based on the details of your report.

Remember, it is your responsibility to report known or suspected concerns if you identify something that is not consistent with this Code, Company policies, or any other applicable rule or regulation. Moreover, reports submitted in bad faith are also a violation of the Code and subject to disciplinary action.

**Q:** If I report a concern to a Compliance & Ethics Team member, should I expect a response?

**A:** Yes. The Compliance & Ethics Team aims to respond to all questions and concerns in a prompt and comprehensive manner. Because we respect confidentiality, detailed information about the outcome of a matter will be shared only on a need-to-know basis.



**KEEP IN MIND:** YOU MAY ALSO ACCESS THE INTEGRITY HOTLINE TO CONFIDENTIALLY ASK QUESTIONS.



---

# Our Commitment to Our Customers



## Excellence in Quality

We maintain the Company's valuable reputation by meeting and exceeding the quality control and manufacturing requirements of customers, as well as the various rules and regulations governing the healthcare industry. Therefore, the products that we manufacture and the services we provide must meet our customer's needs as well as represent superior value and reliability. We must follow all quality processes and safety requirements set forth in our **Quality Management System (QMS)** and comply with all applicable standards and regulations on the development of our products and services, including Good Manufacturing Practices (GMP), Good Documentation Practices (GDP), design controls, labeling, marketing controls, and manufacturing process controls.

To ensure the quality of Company products, we must: (i) recognize potential product complaints and adverse events, (ii) gather all information available when reporting potential

At iRhythm, the patient is at the heart of everything we do. Each of us has the responsibility to contribute to quality through collaboration, innovation, and passion.

Our **Quality Policy** is to deliver safe and effective cardiac monitoring devices and services to our patients, make quality a competitive advantage for growth, and to always comply with the law.

complaints and adverse events, and (iii) report potential complaints and adverse events to our Quality Team as soon as we discover them.

## Data Privacy + Security

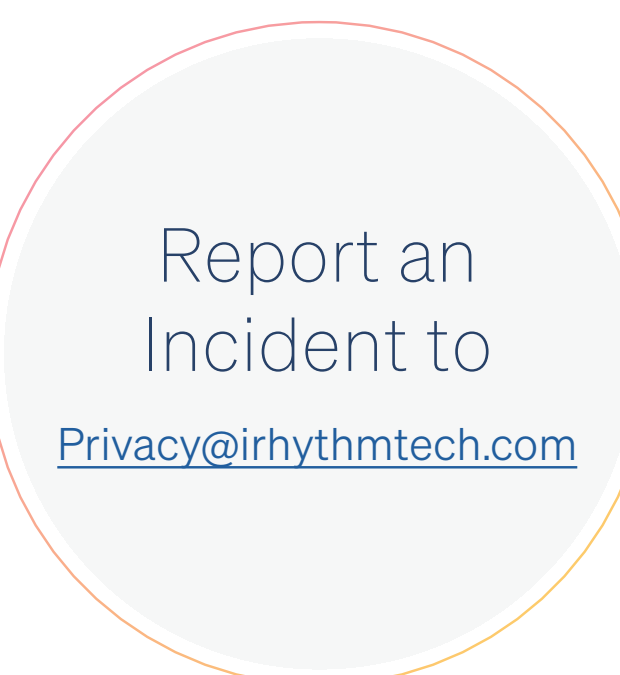
In a healthcare company like iRhythm, respecting data privacy is very important. Data privacy protects patients' personal and medical information. When we handle this data carefully, it helps build trust between patients and healthcare providers. If confidential information is leaked or misused, it can lead to serious problems, such as identity theft or patients feeling uncomfortable sharing their health issues. By following privacy rules and training, we ensure that health information stays safe, which is essential for providing good care and maintaining the reputation of iRhythm. This is also true for Company Personnel with access to personal information. All individuals are entitled to have confidence that personal information is respected and handled according to legal requirements.

The Company also has legal obligations to regulators and individuals if patient data is not shared properly, such as patient information being shared with the wrong person or misused by a person who improperly gains access to their data. These types of events are called "Incidents" and must be reviewed to determine if there has been a "Breach". Any Breach must be handled appropriately according to the different laws that regulate the Company. If you become

aware of anything that could suggest that someone's personal information has been misused or fallen into the wrong hands, you should notify the Privacy Compliance or the Security Team immediately.

You can learn more about Data Privacy and Security at iRhythm as well as accessing Company policies, at Global Privacy at iRhythm.

Personal information is anything that includes information which can help to identify an individual. At iRhythm, personal information could be as simple as a serial number or even date of service. When in doubt, please check with a Privacy Compliance Team Member.



**KEEP IN MIND:** ALL OF US HAVE AN OBLIGATION TO BE ESPECIALLY CAREFUL WITH ANY PATIENT INFORMATION RECEIVED, REQUESTED, OR SHARED — WHETHER INTERNALLY, OR WITH AN INSURANCE COMPANY, PROVIDER, OR EVEN THE PATIENT.



## Protecting Assets

We have a shared responsibility to safeguard Company and customer assets and materials against loss, damage, carelessness, waste, misuse, and theft. You should only use Company assets for legitimate purposes and promptly report any waste, loss, or damage. Assets include tangible items, such as machinery, vehicles, furniture, funds, computers, phones, electronic systems, and other physical items, as well as intangible items, such as proprietary information. Proprietary information includes all non-public information that might be of use to competitors or harmful to iRhythm, its business partners, or customers if disclosed, including financial data, customer data, business strategies, research and development activities, and intellectual property. Proprietary information should be accessed and used only for authorized purposes, should not be shared with anyone who does not have proper authorization and a business purpose for receiving it, and must be promptly removed from non-company (personal) devices. Likewise, we must not infringe on the intellectual property rights of any other companies or allow the intellectual property of customers or other third parties be misused or misappropriated. If you are unsure as to whether certain information is considered proprietary, treat it as proprietary until you are directed otherwise.

## Cybersecurity Measures

We must take all necessary steps to ensure the safety and integrity of Company information and technology systems and networks. We have a responsibility to use computer, data and telecommunication resources in a safe, ethical, lawful, efficient, and productive manner. Unauthorized, inappropriate or unlawful use of the Company's telecommunication

resources or equipment may result in disciplinary and legal action. Where allowed by law, the Company may monitor and access the use of Company assets, and Company Personnel in the United States should not have an expectation of privacy with respect to the use of Company information systems and networks, including computers and mobile devices.

We have a shared responsibility to adhere to cybersecurity best practices. Cybersecurity best practices include the following principles: treat all company information as confidential, do not share passwords or login information, use only your authorized access credentials, use Company resources responsibly and for legitimate business purposes, avoid using personal devices for company data unless permitted by policy, use encryption and secure file-sharing methods when transmitting sensitive information, and adhere to all applicable laws, regulations and organizational policies related to information security.

## Truthful Advertising + Marketing

It is crucial that we accurately and truthfully represent the Company's products and services at all times and refrain from engaging in any unfair, misleading or deceptive sales or marketing practices. Sales, marketing, and advertising in this context is very broad and includes any information, training, programs, or materials designed to inform our current and potential customers, patients, investors or the media about our products or services (collectively, "Marketing Materials"). All Marketing Materials must be balanced, fair, objective, unambiguous, and consistent with product labeling. Further, Marketing Materials should be approved through appropriate review and approval procedures consistent with Company policies and the laws of the countries in which

Company conducts business. Similarly, we must only market and promote Company products for their approved uses (as determined by applicable regulators and government agencies). Comments about, and comparisons to, competitor products must be fair, substantiated and in compliance with all laws and regulations. We should not disparage competitors' products, services, or employees.

### Safe, High-Quality Products + Services

iRhythm is committed to developing and providing safe, reliable, and high-quality products and services, and all Company Personnel must comply with all applicable processes, procedures and policies designed to ensure the quality of Company products and services. We all share the obligation to promptly raise any concerns regarding the quality of Company products and services and any ethical concerns about clinical treatment. iRhythm takes complaints or possible adverse events seriously and will promptly communicate and investigate all events consistent with the laws and regulations of the applicable jurisdiction.

### Research + Development

iRhythm is committed to the highest quality of research, development, and data collection. We must take the necessary steps to ensure the safety of patients participating in clinical studies, as well as the security and privacy of the information provided from the patient to the Company. All such research and data collected must be carefully recorded, maintained, and secured in a way that complies with data protection laws, and enables accurate reporting, interpretation, and verification.

### Third Party Management

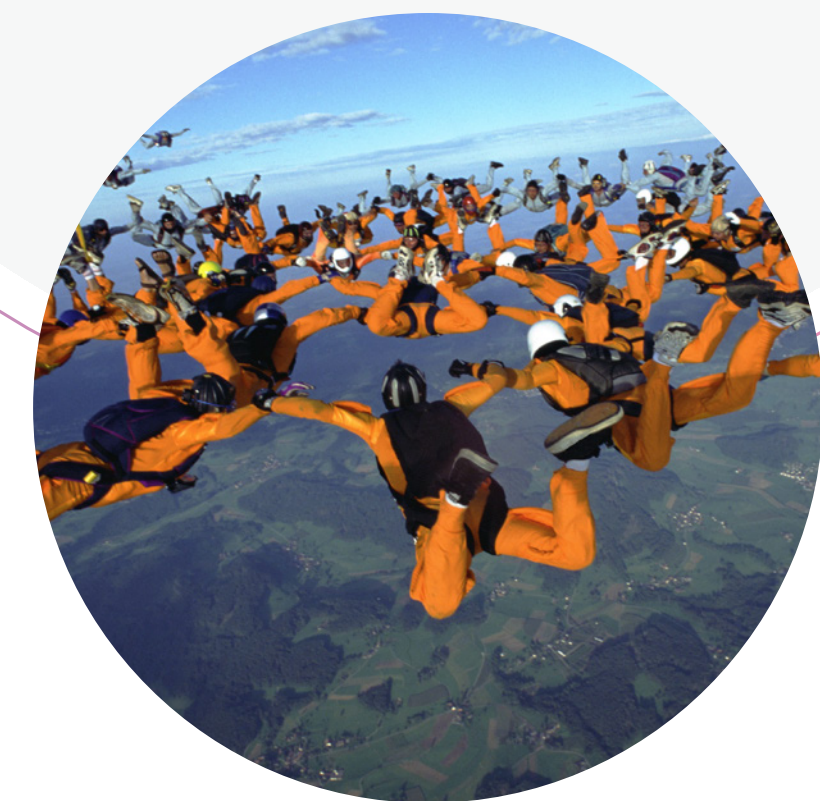
The Company's commitment to ethical conduct and responsible business practices extends to all third parties who act on behalf of or for the benefit of the Company— regardless of where the third party is located worldwide. It is important that we conduct reasonable and periodic diligence to ensure that third parties are equally committed to compliance with applicable laws and regulations in their applicable jurisdictions. This due diligence includes, but is not limited to, compliance with anti-boycott, economic sanctions and trade embargoes, debarred individuals, or entities, import and export of goods and services, anti-terrorism, and money-laundering.

It also is important that we support and respect the protection of human rights in all Company operations. Third parties shall not engage in any form of forced, indentured, slave or child labor nor should they treat Company Personnel harshly or inhumanely. We follow applicable practices and laws regarding the disclosure of conflict minerals. Company is committed in its operations and supply chain, and Company will publish annual statements outlining its responses to such issues.

### Waiver Under Appropriate Circumstances

Certain provisions of this Code may be waived under appropriate circumstances by the Chief Compliance Officer. Waivers involving an executive officer, director or key accounting personnel may only be granted by the iRhythm Board of Directors, and such waivers will be disclosed as required by applicable law. iRhythm reserves the right to periodically review the Code and make any updates or revisions that are necessary or appropriate.

Our suppliers, distributors, and consultants are, by extension, a part of our iRhythm culture, so we do our best to hold them to the same ethical standards we follow.



---

# Our Commitment to Being a Great Place to Work



## Diversity, Equity, Inclusion + Belonging

iRhythm believes that the magic of innovation comes from embracing our differences. It is the unique perspectives and diverse backgrounds of our team and everyone we interact with that fuel our creativity and drive progress. We see our Company Personnel as our most valuable asset, and we know that when we harness a variety of ideas, experiences and beliefs, we can accelerate innovation and enhance patient care, ultimately making the Company even stronger.

The Company is wholeheartedly committed to weaving diversity, equity, inclusion, and belonging into every aspect of its work. From recruitment activities to talent development to internal policies, the Company strives to create an environment where each person feels valued and empowered to contribute their best selves.

To support this mission, the Company has established Employee Resource Groups (ERGs) and our philanthropic initiative, Rhythm for a Reason. These programs are designed to engage, support, and uplift employees, fostering a sense of community and shared purpose. Together, we are building a culture where each person can thrive and make a meaningful impact.

### ERGs at iRhythm



Women in Rhythm



Lotus  
(AAPI ERG)



African Americans  
in Rhythm



iPRIDE & Allies  
(LGBTQ+ERG)



Join Here!



Juntos at iRhythm  
(Latine ERG)

We are committed to an inclusive and representative culture where everyone can feel they belong and we recognize, celebrate and leverage diversity of ideas, skills and experiences to achieve and innovate beyond the imaginable and improve outcomes for all.

## Prohibited Discrimination + Harassment

Discrimination and harassment are not permitted at iRhythm. The Company does not tolerate verbal or physical harassment, including sexual harassment, bullying or any behavior that creates an intimidating, offensive, abusive, or hostile work environment. This includes, but is not limited to, racist, sexist, or ethnic jokes or other comments. Such harassment is

unacceptable and will be eliminated from every work setting in which Company Personnel could be exposed to such behavior including, but not limited to Independent Diagnostic Facilities (IDTFs), offices, and manufacturing facilities. We show respect for each other by speaking out if a co-worker's conduct makes us uncomfortable. See the reporting channels on page 28.



**KEEP IN MIND:** JUST BECAUSE A CERTAIN ACTION DOESN'T BOTHER YOU, THAT DOESN'T MEAN THAT IT WOULDN'T BOTHER SOMEONE ELSE. ALWAYS BE CONSCIOUS OF THE EFFECT YOUR BEHAVIOR MIGHT HAVE ON OTHERS.

## Equal Employment Opportunities

iRhythm is a merit-based, equal opportunity employer committed to treating every individual fairly and with respect. This includes providing equal employment opportunities to all employees and applicants. All employment-related decisions are made only after evaluating an individual's skillset, qualifications, and job performance considering business needs and other appropriate and lawful factors. The Company does not base any decisions on unlawful discriminatory factors including, but not limited to, race, ethnicity, religion, color, gender identity, age, sexual orientation, disability, religion, national origin, or marital, veteran, or citizenship status.

**Q:** I work as a sales representative and have been assigned to a customer who makes advances at me each time I visit the office. I have brushed this off for a long time, but the advances are getting more frequent and harder to ignore. It turns out this is also one of our best customers, and I'm afraid that if I report this to my manager the importance of the customer's relationship with iRhythm will be taken more seriously than my feelings. What should I do?

**A:** You should not be experiencing this type of interaction with a customer, no matter who they are. If you are uncomfortable reporting this to your manager, you can use one of the many reporting options to confidentially discuss this concern including but not limited to the Integrity Hotline, a Compliance & Ethics Team Member, or Human Resources. The Company can find many solutions to solve a problem like this in a manner that does not cause you further embarrassment.

**Q:** I feel as though I was not given a promotion because of my gender. What should I do?

**A:** Let's talk about it. iRhythm requires that employment decisions be made without regard to the gender of the candidate. If you feel you have been treated unfairly, you should report your concern. See Our Commitment to Raising Concerns + Issues section for information on how to report your concerns.

## Environmental Health + Safety in the Workplace

As an ISO 14001 certified company, all Company activities must be conducted in a safe and environmentally responsible manner. This includes proactive inspection in each workplace to correct and continuously improve conditions that may create a risk of personal injury or adverse environmental impact. Moreover, we are responsible for not only for our own health and safety, but also for that of our fellow Company Personnel and working environment. As such, we make responsible choices – even when doing so may be difficult – and promptly report accidents, injuries, near-misses and unsafe practices and conditions. Each person is responsible for knowing how to perform his or her job safely and in compliance with the law.



### DID YOU KNOW?

ANY WORK-RELATED INJURIES, SAFETY INCIDENTS OR ILLNESSES MUST BE REPORTED TO THE ENVIRONMENTAL HEALTH AND SAFETY (EHS) DEPARTMENT. EHS USES THESE REPORTS TO INVESTIGATE INCIDENTS AND/OR UPDATE POLICIES AND PROCEDURES TO PREVENT FUTURE INCIDENTS.

## Preventing Violence

iRhythm has a zero-tolerance policy for acts or threats of violence. We should never threaten or take part in hostile behavior, even in a joking manner, or engage in physical or verbal abuse. To keep the workplace safe, weapons are not allowed on Company property.



---

# Our Commitment to the Public



## Human Rights

The Company is committed to respecting and advancing the human rights of all individuals globally. We comply with all applicable laws related to forced labor, child labor, and human trafficking, and we will not tolerate the abuse of human rights in the Company's operations or supply chain. Please refer to the **Supplier Code of Conduct** and **Conflict Minerals Policy** located on the Company's website.

## Environmental Protection

iRhythm is committed to being a good corporate citizen. We are dedicated to following environmentally sound business practices to help protect the environment, comply with all applicable environmental laws and regulations, and continually look for ways to reduce waste and more efficiently use energy, water, and other natural resources. iRhythm has been named as one of America's Greenest Companies for 2025.



### We are committed to:

- Being a good corporate citizen and improving the impact our operations make on the environment.
- Creating a great place for people to work and live in the communities where we operate.
- Acting with integrity and doing the right thing.

## Volunteerism + Community Involvement

The Company is proud to be a responsible corporate citizen and neighbor both globally and in every community where it operates. The Company encourages all Company Personnel to be good citizens by promoting engagement with local organizations and by volunteering in the communities in which they work and live.

## Prohibiting Substance Abuse

We each have an obligation to report to work free from the influence of any substance that could impair the effective and safe performance of our jobs. Given the nature of the Company, we must perform optimally every day to ensure the quality, safety, and compliance.

The Company is committed to the principles of corporate social responsibility and strives to minimize its impact on the environment, respect human life, support the communities in which we live and work, appropriately respond to media, investor, public, and government inquiries and act with corporate integrity consistent with best practices and in compliance with all applicable laws and regulations. For details regarding our sustainable practices, please refer to our most recent **Environmental, Social and Governance report** located on the Company's website.

## Charitable + Political Activities

iRhythm is committed to giving back to the community. Any charitable activity that the Company engages in should be consistent with iRhythm's corporate vision and purpose. Importantly, the Company's support of charitable, educational

or philanthropic organizations and/or causes may not be contingent on or related to the recommendation, use or purchase of Company products or services. All charitable donations to Healthcare Organizations (HCO) or at the request of an Healthcare Providers (HCP) must follow the **Grants and Donations Policy**, and obtain prior approval from the Grants Committee before contributing Company funds, time or other assets to a charitable or philanthropic organization. Any public policy or political activities undertaken on behalf of iRhythm (e.g., use of Company funds, time or assets) must be consistent with the law and this Code and pre-approved by the Chief Legal Counsel. If we engage in civic or political activities on a personal basis, we must make it clear that our views and actions are our own, not that of iRhythm.

We recognize that substance abuse and alcohol-related problems, as well as other problems, can be treated. Confidential assistance is available through our Employee Assistance Program (EAPs)

**Q:** I think I may have a substance abuse problem. Can iRhythm help me?

**A:** iRhythm encourages you to seek help by contacting counseling professionals. Contact Human Resources for information regarding support options available to employees struggling with substance abuse.

## Media + Public Relations

The Company is committed to providing accurate and consistent information to the media and the public. As such, only authorized persons may speak on behalf of iRhythm. We should direct all external inquiries about the Company to the head of Public Relations and Communication immediately.

## Social Media

iRhythm's active social media presence enhances the brand and strengthens connections with the public and stakeholders. The Company's designated social media representatives develop, manage, and oversee iRhythm social media activity. This helps ensure that the information the Company provides

is clear, consistent, and accurate. When using social media, it is important to use it responsibly. We have a shared identity as iRhythm Personnel, but we are also individuals with our own thoughts, opinions, and interests.

Outside of work, you may post on social networks, blog, and contribute to wikis. Even in these personal pursuits, however, social media involvement must be consistent with your obligations to iRhythm and fellow Company Personnel. When engaging in the personal use of social media and discussing topics related to iRhythm, you must be honest and disclose the Company's identity. When appropriate, be clear that the views and opinions you post are your own, and never disclose confidential Company information. If there are additional questions, please reference the **Social Media Policy**.

## Interactions with Government Officials

It is important that we fully cooperate and effectively work with government and regulatory agencies and officials to ensure compliance with applicable rules, regulations, audits, and investigations. Any business relationship the Company enters into with government and regulatory entities should be obtained through bona fide means and conducted transparently. For additional information, please reference the **Government Interactions Policy**.



---

# Our Commitment to Ethics + Integrity



## Conflicts of Interest

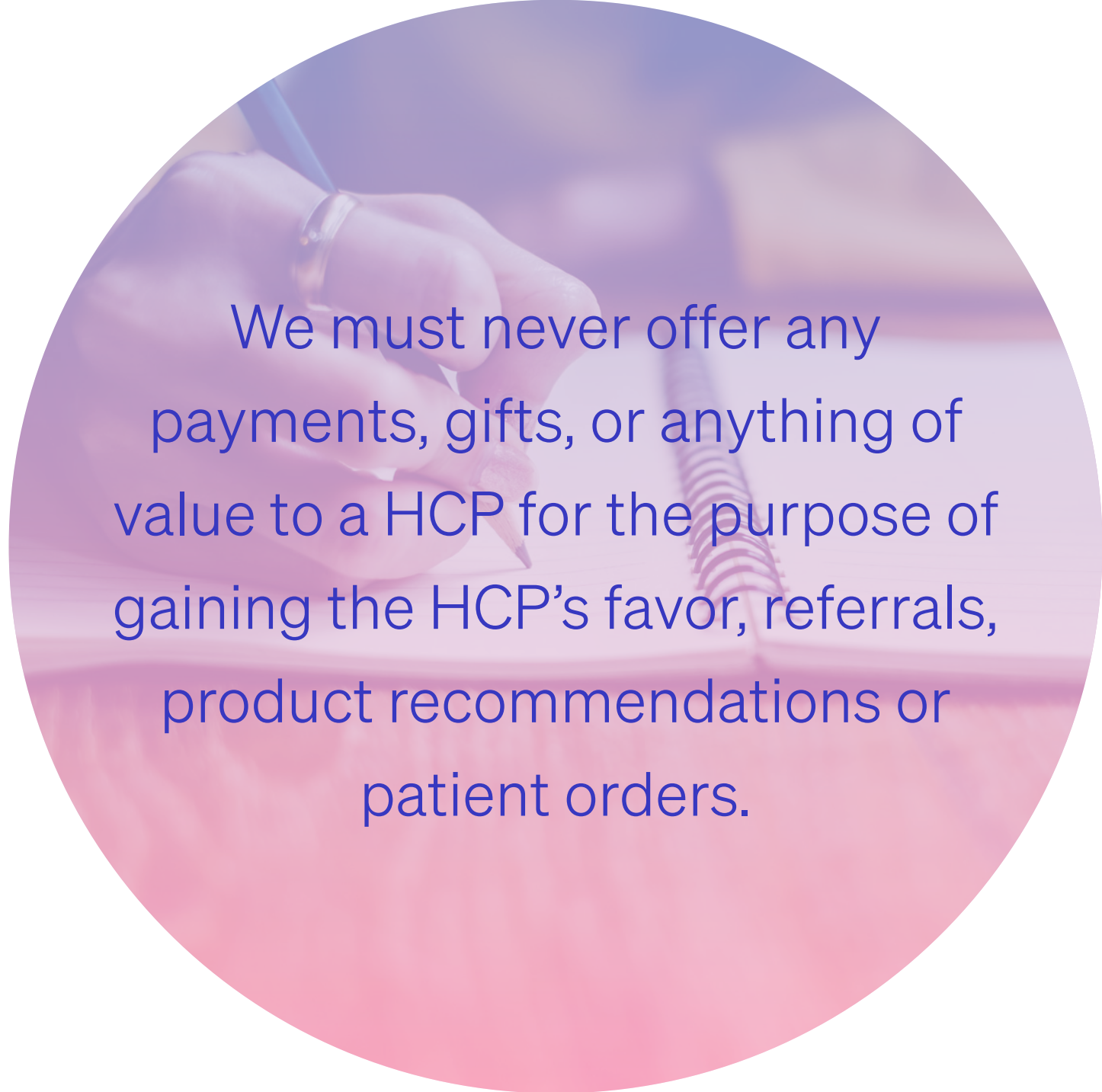
We have a responsibility to avoid personal behavior that conflicts with or appears to conflict with our job duties at iRhythm or with iRhythm's business interests. A personal conflict of interest arises when an employee has a personal interest, such as a financial interest, loyalty to a family member, or romantic relationship, that is or could be inconsistent with iRhythm's business interests or that could influence the employee's decision-making in iRhythm activities. If you have a potential conflict of interest, you must disclose the conflict of interest to the Chief Compliance Officer for review and determination of whether mitigation is appropriate. While the existence of a conflict of interest is not necessarily a violation of the Code, the failure to disclose a conflict of interest could be a violation of this Code. If you there are any questions, please contact a member of the Compliance & Ethics Team or HR Compliance.

### Personal Investments or Transactions

We should avoid significant personal investments in a customer, supplier, or competitor. This may arise if you or a family member has a substantial financial interest in an iRhythm supplier, competitor or customer, or receives compensation from such parties.

### Personal Relationships

It also is not appropriate for an employee to hold a position where they can influence the hiring, work assignments or compensation of a person with whom they have a family, romantic, or other personal relationship. For additional information or if you have any questions please contact HR Compliance or refer to the **Company's Nepotism Policy**.



We must never offer any payments, gifts, or anything of value to a HCP for the purpose of gaining the HCP's favor, referrals, product recommendations or patient orders.

### Outside Business and Other Interests

Working for a competitor, supplier, or customer, or otherwise moonlighting where the services conflict or could create an appearance of a conflict is prohibited, unless allowed with proper approval from HR and Legal. When outside employment is allowed, colleagues are still bound by all confidentiality agreements with iRhythm and all iRhythm policies and procedures relating to confidential, proprietary and/or material non-public information.

## Preventing Bribery + Corruption

The Company is committed to complying with all self-referral, anti-bribery and applicable anti-corruption laws in its business dealings and maintains a zero-tolerance policy for acts of corruption or bribery. As such, we must never offer, attempt to offer, authorize, or promise any sort of financial benefit, bribe, kickback or facilitation payments to anyone for the purpose of obtaining or retaining business or a business advantage for the Company. Moreover, we must never solicit or accept a bribe or kickback, and we will not hire a third party to participate in activity that we could not legally or ethically do ourselves. iRhythm will win business by demonstrating Company excellence – not by providing improper benefits to referral sources. Company Personnel with duties involving transactions or international travel should be familiar with the Foreign Corrupt Practices Act (FCPA), the UK Anti-Bribery Act, and similar local laws to ensure compliance with applicable anti-bribery and anti-corruption laws.

## Engagements with Healthcare Providers (HCPs)

The Company is committed to ethical and transparent interactions with HCPs, whether it be to support the effective use of Company products or services and improve patient care, to develop innovative medical products or to support medical research or education. For example, HCP interactions may include meetings, speaking events, symposia, product education, research, educational events or consulting agreements. In all interactions, we must be aware of and comply with all applicable laws and regulations that govern relationships between the Company and HCPs. We must not offer or provide any improper inducement to an HCP in order

to incentivize or reward the recommendation or use of our products or services. If there are questions, please contact a Compliance & Ethics Team Member or refer to the **HCP Engagement Policy**.

## Business Courtesies

While it is common in many industries to exchange gifts and entertainment in connection with marketing and business development efforts, the healthcare industry is different. Company Personnel may provide hospitality, meals and refreshments (collectively, “Business Courtesies”) to HCPs if they are occasional, modest in value, and reasonable in scope, and follow the laws and regulations in the countries in which the Company does business. Specifically:

- Company Personnel are prohibited from trying to create business opportunities by offering business courtesies or any other financial inducement to any third-party, including an HCP.
- Personnel shall not provide or pay the costs for an HCP’s participation in entertainment or recreational events. Similarly, business meals and/or events should not include entertainment or recreational activities paid for by the Company. If there are questions, please reference the **HCP Meals Hospitality and Travel Policy**.
- Company Personnel must consider the reasonableness of all meals, travel, and hospitality given the totality of circumstances to avoid even the appearance that the giving or accepting of meals, travel, or hospitality could constitute a bribe.

Additionally, various countries in which the Company conducts business maintain stringent and complicated laws that limit and/or prohibit business courtesies that can be provided to HCPs and government officials. Therefore, Company Personnel must avoid offers of business courtesies unless it complies with the requirements set forth in Company policies. If there are questions, please contact a Compliance & Ethics Team Member or reference the **Anti-Bribery and Anti-Corruption Policy**.

## Responding to Legal + Regulatory Inquiries

Company Personnel may be asked to provide information to both internal and external parties related to an audit or investigation. In order to respond promptly, we must immediately notify the heads of the Company’s Quality and Regulatory Departments if a regulatory agency contacts us requesting records or an audit. Likewise, any legal matters or subpoenas must be directed immediately to the Chief Legal Officer.

## Insider Trading

While working at iRhythm, we may learn material non-public information or “inside information” about the Company or other companies that Company conducts business with. “Inside information” is information about a company not known to the public that a reasonable investor would consider important when deciding to buy or sell that company’s securities. We must not buy or sell stock or securities of iRhythm or the stock or securities of any other company when we are in possession of inside information. In addition, we should not disclose such information to anyone else, including



**Q:** My Manager asked me to add data to a report that I believe to be inaccurate and misleading. What should I do?

**A:** Under no circumstances should anyone create, sign, approve, or transmit a record on behalf of the Company if they know or have reason to believe the record is false. If you are not comfortable discussing with your Manager, please reach out to a different Manager, Compliance & Ethics, Human Resources, or contact the Integrity Hotline.

friends and family members at any time. Disclosure of inside information in this manner constitutes an improper “tip,” where both the person who provides the inside information and the person who acts on it are considered to have violated the law. Such “insider trading” activities are prohibited by law and the Code, and all Company Personnel are required to comply with the Company’s **Insider Trading Policy** when engaging in transactions involving iRhythm securities.

## Maintaining Accurate Books + Records

The Company has a responsibility to ensure that its books and records contain accurate and honest information and reflect the truth of underlying transactions or events. “Records” are defined as all physical or electronic documents we create as part of our work at the Company. Accurate records are crucial to iRhythm’s ability to comply with regulatory agency audits and the law. Under no circumstances should anyone sign, approve, or transmit a record on behalf of the Company if they know or have reason to believe the record is false.

When it comes to ensuring accurate records, the Company’s senior financial officers have a special responsibility to promote integrity within iRhythm. The Chief Executive Officer, Chief Financial Officer, Principal Accounting Officer(s), Controller(s) or anyone performing a similar function are not only held to the principles of the Code, but they also have an obligation to ensure that the Company’s public disclosures are full, fair, accurate, timely and understandable. Further, they have a responsibility to comply with all applicable governmental laws, rules, and regulations and to promptly report any suspected violations to the Chair of the Audit Committee.

## Fair Competition

It is important that the Company compete fairly in the marketplace. Thus, the Company may not enter agreements or business arrangements that are anti-competitive or unfairly restrict trade. Any agreement that restrains trade may be a violation of anti-competition laws, regardless of the other companies involved. For these reasons, we should avoid inappropriately discussing sensitive, potentially anti-competitive topics with third parties, including prices or pricing, output capacities, sales, bids, profits or profit margins, costs, or methods of distribution.

We also should refrain from obtaining any information about competitors through improper or unethical means. Similarly, we should not accept, disclose, or use competitive information if there is reason to believe that it was disclosed to us in breach of an obligation of confidentiality (e.g., by an employee who previously worked for a competitor).

## Trade Compliance

iRhythm is a global company and must comply with applicable laws, regulations, licensing requirements, boycotts, embargoes, and other restrictions that govern exporting and importing of Company products and technology. We also must provide accurate, truthful information about Company products and other items to Customs officials and other relevant authorities and not participate in trade with sanctioned countries.

## Billing + Reimbursement

iRhythm is committed to understanding and following all laws, regulations and guidelines that govern billing, collection or reimbursement of its products and services, and we may only bill for products and services that we believe are medically necessary. Likewise, we must maintain complete and accurate records and recommend and/or use correct billing and reimbursement codes. It is important that we correct and report any substantive errors as soon as possible and raise any questions regarding unclear billing issues with a manager or appropriate personnel to ensure the Company’s billing-related activities comply with applicable law.

If there are any questions, please contact a Compliance & Ethics Team Member or reference the **Government Interactions Policy**.



---

# Our Commitment to Raising Concerns + Issues





If you are aware of activities that are not consistent with the Code, policies or any law or regulation, it is your responsibility to report to:

- Your Manager
- Human Resources
- The Chief Compliance Officer:
  - Via email at [compliance@irhythmtech.com](mailto:compliance@irhythmtech.com)
- iRhythm's Integrity Hotline, which allows you to report concerns anonymously:
  - In the United States: 1-844-884-0117
  - In the United Kingdom: 0800 89 0011
  - In the Philippines: 02 8231 3103



#### LET YOUR VOICE BE HEARD!

HAVE AN IDEA ABOUT MAKING THIS CODE MORE USEFUL? HAVE A TIP ON MAKING BETTER ETHICAL DECISIONS? THE INTEGRITY TEAM WANTS TO HEAR WHAT YOU HAVE TO SAY.

# iRHYTHM®

699 8th Street, Suite 600, San Francisco, CA 94103 (888) 693-2401 [irhythmtech.com](https://irhythmtech.com)  
iRhythm, Zio, Zio XT, Zio AT, MyZio, and ZioSuite are trademarks of iRhythm Technologies, Inc.  
©2024. All rights reserved. Revised 2024