CODE OF BUSINESS CONDUCT AND ETHICS

AS AMENDED BY THE BOARD OF DIRECTORS EFFECTIVE ON JULY 31, 2024

INTRODUCTION

Outset Medical, Inc. (the "***Company***" or "***Outset***") is committed to maintaining the highest standards of business conduct and ethics. This Code of Business Conduct and Ethics (the "***Code***") reflects the business practices and principles of behavior that support this commitment. We expect every employee, officer and director of Outset to read and understand the Code and its application to the performance of his or her business responsibilities. References in the Code to employees are intended to cover officers and, as applicable, directors.

Officers, managers and other supervisors are expected to develop in employees a sense of commitment to the spirit, as well as the letter, of the Code. Supervisors are also expected to ensure that all agents and contractors conform to Code standards when working for or on behalf of Outset. Nothing in the Code alters the at-will employment policy of the Company.

The Code addresses conduct that is particularly important to proper dealings with the people and entities with whom we interact, but reflects only a part of our commitment. From time to time we may adopt additional policies and procedures with which our employees, officers and directors are expected to comply. However, it is the responsibility of each employee to apply common sense, together with his or her own highest personal ethical standards, in making business decisions where there is no stated guideline in the Code.

Action by members of your immediate family, significant others or other persons who live in your household (referred to in the Code as "***family members***") also may potentially result in ethical issues to the extent that they involve Company business. For example, if your family member accepts inappropriate gifts from one of our suppliers, that could create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with the Code, you should consider not only your own conduct, but also that of your family members.

YOU SHOULD NOT HESITATE TO ASK QUESTIONS ABOUT WHETHER ANY CONDUCT MAY VIOLATE THE CODE, VOICE CONCERNS OR SEEK GUIDANCE TO CLARIFY GRAY AREAS. SECTION 23 BELOW DETAILS THE COMPLIANCE RESOURCES AVAILABLE TO YOU. IN ADDITION, YOU SHOULD BE ALERT TO POSSIBLE VIOLATIONS OF THE CODE BY OTHERS AND REPORT SUSPECTED VIOLATIONS, WITHOUT FEAR OF ANY FORM OF RETALIATION, AS FURTHER DESCRIBED IN SECTION 23 Violations of the Code will not be tolerated. Any employee who violates the standards in the Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

1. *Honest and Ethical Conduct*

It is our policy to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The integrity and reputation of Outset depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity is the foundation of corporate integrity.

2. *Legal Compliance*

Obeying the law, both in letter and in spirit, is the foundation of this Code. Our success depends upon each employee's operating within legal guidelines and cooperating with local, national and international authorities. We expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. We hold periodic training sessions to ensure that all employees comply with the relevant laws, rules and regulations associated with their employment, including laws prohibiting insider trading (which are discussed in further detail in Section 3 below). While we do not expect you to memorize every detail of these laws, rules and regulations, we want you to be able to determine when to seek advice from others. If you do have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your supervisor or the Chief Compliance Officer, or in the absence of an appointed Chief Compliance Officer, the General Counsel (as further described in Section 23). In the absence of an appointed Chief Compliance Officer, all references to Chief Compliance Officer in this Code shall mean General Counsel.

Disregard of the law will not be tolerated. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails and chat transcripts, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. You must fully cooperate with any such audits and investigations, including by providing truthful, accurate and complete information and complying with any applicable instructions provided by the Legal department.

3. *Insider Trading*

Employees who have access to confidential (or "inside") information obtained through their position at the Company are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All non-public information about the Company or about companies with which we do business is considered confidential information. To use material non-public information in connection with buying or selling securities, including "tipping" others who might make an investment decision on the basis of this information, is not only unethical, it is illegal. Employees must exercise the utmost care when handling material inside information. Please refer to the Company's Insider Trading Policy for more detailed information.

4. *International Business Laws*

Our employees are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption, or the conduct of business with specified individuals, companies or countries. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

- The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;

- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from traveling to or doing business with embargoed countries, subject to sanctions imposed by the U.S. government, as well as specific companies and individuals identified on lists published by the U.S. Treasury Department;

- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and

- Antiboycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

If you have a question as to whether an activity is restricted or prohibited, seek assistance before taking any action, including giving any verbal assurances that might be regulated by international laws. Please also refer to our Anti-Corruption Policy.

5. *Antitrust*

Antitrust laws are designed to protect the competitive process. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit:

- agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;

- agreements, formal or informal, that establish or fix the price at which a customer may resell a product; and

- the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

Certain kinds of information, such as pricing, production, and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the Chief Compliance Officer whenever you have a question relating to these laws.

6. *Environmental Compliance*

Federal law imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of

environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.

It is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We are committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

7. *Conflicts of Interest*

We respect the rights of our employees to manage their personal affairs and investments and do not wish to impinge on their personal lives. At the same time, employees should avoid conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of the Company. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation. We expect our employees to be free from influences that conflict with the best interests of the Company or might deprive the Company their undivided loyalty in business dealings. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest are prohibited unless specifically authorized as described below.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of the Company, you should discuss the matter with your supervisor or the Chief Compliance Officer. ***Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Chief Compliance Officer and providing the Chief Compliance Officer with a written description of the activity***. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Chief Compliance Officer. Officers and directors may seek authorizations and determinations from the Company's Nominating and Corporate Governance Committee. Factors that may be considered in evaluating a potential conflict of interest are, among others:

- whether it may interfere with job performance, responsibilities or morale;
- whether it involves access to confidential information;
- whether it may interfere with the job performance, responsibilities or morale of others within the organization;
- any potential adverse or beneficial impact on our business;
- any potential adverse or beneficial impact on our relationships with our customers or suppliers or other service providers;
- whether it would enhance or support a competitor's position;
- the extent to which it would result in financial or other benefit (direct or indirect) to the employee;

- the extent to which it would result in financial or other benefit (direct or indirect) to one of our customers, suppliers or other service providers; and

- the extent to which it would appear improper to an outside observer.

Although no list can include every possible situation in which a conflict of interest could arise, the following are examples of situations that may, depending on the facts and circumstances, involve problematic conflicts of interests:

- **Employment by (including consulting for) or service on the board of a competitor, customer or supplier or other service provider.** Activity that enhances or supports the position of a competitor to the detriment of the Company is prohibited, including employment by or service on the board of a competitor. Employment by or service on the board of a customer or supplier or other service provider is generally discouraged and you must seek authorization in advance if you plan to take such a position.

- **Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business or competes with us.** In addition to the factors described above, persons evaluating ownership in other entities for conflicts of interest will consider the size and nature of the investment; the nature of the relationship between the other entity and the Company; the employee's access to confidential information and the employee's ability to influence Company decisions. If you would like to acquire a financial interest of that kind, you must seek approval in advance.

- **Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us.** See Section 11 for further discussion of the issues involved in this type of conflict.

- **Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with us**.

- **Taking personal advantage of corporate opportunities.** See Section 8 for further discussion of the issues involved in this type of conflict.

- **Moonlighting without permission.** Other than with the prior written consent of the V.P., People Operations, simultaneous employment or consulting with any other entity or enterprise is strictly prohibited.

- **Conducting our business transactions with your family member or a business in which you have a significant financial interest.** Material related-person transactions approved by the Audit Committee and involving any executive officer or director will be publicly disclosed as required by applicable laws and regulations in keeping with the Company's Related Persons Transactions Policy.

- **Exercising supervisory or other authority on behalf of the Company over a co-worker who is also a family member**. The employee's supervisor and/or the Chief Compliance Officer will consult with the People Operations department to assess the advisability of reassignment in this situation.

Loans to, or guarantees of obligations of, employees or their family members by the Company could constitute an improper personal benefit to the recipients of these loans or guarantees, depending on

the facts and circumstances. Some loans are expressly prohibited by law and applicable law requires that our Board of Directors approve all loans and guarantees to employees. As a result, all loans and guarantees involving employees by the Company must be approved in advance by the Board of Directors after recommendation of the Board's Nominating and Corporate Governance Committee.

8. ***Corporate Opportunities***

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by the Chief Compliance Officer. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

9. ***Maintenance of Corporate Books, Records, Documents and Accounts; Financial Integrity; Public Reporting***

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or test results, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;

- transactions be supported by appropriate documentation;

- the terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;

- employees comply with our system of internal controls; and

- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

Our accounting records are also relied upon to produce reports for our management, stockholders and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the SEC. Securities laws require that these reports provide full, fair, accurate, timely and understandable disclosure and fairly present our financial condition and results of operations. Employees who collect, provide or analyze information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting

and disclosures. In addition:

- no employee may take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations;

- all employees must cooperate fully with our Finance department, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete; and

- no employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

Any employee who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor, the Chief Compliance Officer, the Audit Committee of the Board or one of the other compliance resources described in Section 23 or in accordance with the provisions of the Company's Whistleblower Policy on reporting complaints regarding accounting and auditing matters.

10. *Fair Dealing*

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your supervisor or the Chief Compliance Officer, as further described in Section 23.

You are expected to deal fairly with our customers, suppliers, employees and anyone else with whom you have contact in the course of performing your job. Be aware that the Federal Trade Commission Act provides that "unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful." It is a violation of the Federal Trade Commission Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

11. *Gifts and Entertainment*

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage with customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and typically acceptable practice as long as it is not extravagant and limited.

Unless express permission is received from the Chief Compliance Officer, his or her designee or the Audit Committee, gifts and entertainment cannot be offered, provided or accepted by any employee unless consistent with customary business practices and not (a) of more than token or nominal monetary value (i.e., more than $200), (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis or (e) in violation of any laws, *provided, however*, that gifts involving Health Care Professionals (as defined in Section 12) shall be subject to additional requirements, including those set forth in this Code and any other applicable Company policies. This principle applies to our transactions everywhere in the world, even where the practice is widely considered "a way of doing business." Employees may not accept gifts or entertainment if they could reasonably be deemed to affect their judgment or actions in the performance of their duties. Our customers, suppliers and the public at large should know that our employees' judgment is not for sale.

Under some statutes, such as the U.S. Foreign Corrupt Practices Act, giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. **Furthermore, gratuities and payments to Health Care Professionals and teaching hospitals must be in accordance with federal and state laws, including the federal Anti-Kickback Statute and Physician Payments Sunshine Act and similar state laws.** Discuss with the Chief Compliance Officer or his or her designee any proposed gifts or entertainment if you are uncertain about their appropriateness.

12. *Health Care Professional Interactions*

The Company is firmly committed to complying with all laws and regulations governing its interactions with Health Care Professionals. Agents and employees of the Company may not engage in any conduct that unlawfully induces anyone to refer patients or to purchase, recommend, use, or arrange for the purchase or use of, Company products or services. The term "Health Care Professional" or "HCP" means any individual or entity involved in providing health care services and/or items to patients, which purchase, recommend, use, arrange for the purchase of the Company's products or services. This includes, but is not limited to, physicians, nurses, nurse practitioners, physician assistants, operating room staff, physical therapists, all hospital employees regardless of title or level, and all employees of HCPs.

13. *Protection and Proper Use of Company Assets*

All employees are expected to protect our assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on our profitability. Our property, such as office supplies, computer equipment, and buildings, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted, provided that the use complies with Company policy. You may not, however, use our corporate name, any brand name or trademark owned or associated with the Company or any letterhead for any personal purpose.

You may not, while acting on behalf of the Company or while using our computing or communications equipment or facilities, either:

- access the internal computer system or other resource of another entity without express written authorization from the entity responsible for operating that resource; or

- violate the intellectual property or privacy rights of others, or commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as "spam") or material of objectionable content in violation of applicable law, trafficking in contraband of any kind or any kind of espionage.

If you receive authorization to access another entity's internal computer system or other resource, you must make a permanent record of that authorization so that it may be retrieved for future reference, and you may not exceed the scope of that authorization.

The Company reserves the right to monitor use and location of its property, in an effort designed to ensure that its property is being used in accordance with Company policy and the law, and protect its employees, visitors, assets, and the information with which it is entrusted. For example, the Company may use Closed Circuit TV systems, monitor badge swipe data and review employee internet or system usage, system and application log details, Company email and other electronic messaging systems, Company voice mail systems, content of Company telephone calls using our infrastructure, hard drive contents, and GPS location data when using a Company vehicle or Company-provided GPS application in a personal vehicle. Whenever the Company engages in monitoring, it is required to do so in accordance with the law. Any misuse or suspected misuse of our assets must be immediately reported to your supervisor or the Chief Compliance Officer.

14. *Confidentiality*

One of our most important assets is our confidential information. As an employee of the Company, you may learn of information about the Company that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed, such as business plans, scientific and technical strategies, financial information, information related to the Company's research, testing platforms and sequencing methods, data and results, inventions, works of authorship, trade secrets, processes, conceptions, formulas, patents, patent applications, licenses, suppliers, manufacturers, customers, market data, personnel data, personally identifiable information pertaining to our employees, customers or other individuals (including, for example, names, addresses, telephone numbers and social security numbers), and similar types of information provided to us by our customers, suppliers and partners. This information may be protected by patent, trademark, copyright and trade secret laws.

In addition, because we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat our confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

Every employee must keep confidential information confidential unless and until that information is released to the public through approved channels (usually through a press release, an SEC filing or a formal communication from a member of senior management, as further described in Section 15). This means employees may not disclose to any person confidential information about the Company or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels. This means you may not share confidential information with:

- Outsiders who are not under a non-disclosure obligation to the company, and
- Other employees of the Company, unless they have a legitimate need to know the information in order to perform their job duties.

Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, computer disks and laptop computers, should be stored securely. Unauthorized posting or discussion of any confidential information concerning our business, information or prospects on the Internet is prohibited. You may not discuss our business, information or prospects in any "chat room," regardless of whether you use your own name or a pseudonym. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas in and around our place of business. All Company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company except where required for legitimate business purposes.

Due to the high risk of inadvertent disclosure of confidential or proprietary information, you are strictly prohibited from participating in any "expert network" or similar organization without the prior written consent of the Chief Compliance Officer.

15. *Media/Public Discussions*

It is our policy to disclose material information concerning Outset to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the company will have equal access to information. All inquiries or calls from the press and financial analysts should be referred to the Company's Chief Executive Officer ("***CEO***") or Chief Financial Officer ("***CFO***"), whom we have designated as our official spokespersons. Unless a specific exception or designation has been made by the CEO or CFO, these spokespersons are the only people who may communicate with the press on behalf of the Company. You also may not provide any information to the media about us off the record, for background, confidentially or secretly. For additional guidance, please refer to our Corporate Disclosure policy.

16. *Personal Information*

"Personal Information" is generally defined as any information that relates to an identified or identifiable individual. Personal Information is typically subject to data privacy laws that govern how it may be processed. Some jurisdictions define Personal Information more broadly than defined above. For example, in California, the definition of Personal Information may include information about households in addition to individuals. In addition, some states such as Washington and Nevada, have laws that relate to "consumer health data," which may include more information than just that related to treatment for physical or mental conditions. Under certain state and federal laws, certain types of health information are considered especially sensitive and may be subject to more restrictive laws, such as that related to mental health conditions and treatments, substance abuse, genetic test results, and reproductive healthcare. Other jurisdictions may exclude certain information from the definition of Personal Information, such as information that is publicly available. Finally, some laws apply extra protections to certain types of Personal Information, such as information regarding race/ethnicity, religion, sex life, and other similar characteristics. Information related to financial accounts is also particularly sensitive, and protected by a number of state and federal laws. This includes information such as bank account information and Social Security Numbers.

At Outset, we take our obligations to comply with applicable data privacy laws seriously. Where we are the decision-maker with regard to what Personal Information we process and how we process it, it is our policy to take steps designed to:

- Collect Personal Information fairly and lawfully;

- Be transparent about what Personal Information we process;
- Process Personal Information for purposes that are compatible with those we have disclosed to the individual;
- Process Personal Information that is adequate, relevant and limited to what is needed; and
- Keep Personal Information current and accurate.

When we are not the decision maker regarding the Personal Information we process, we are subject to contractual obligations that document our obligations with respect to the Personal Information that we process.

Employees who have questions about our obligations regarding the processing of Personal Information should contact the Privacy office at privacy@outsetmedical.com.

17. *Patient Information*

Patient information is a kind of Personal Information that, because of its sensitivity, is subject to special handling requirements under privacy laws, including the Health Insurance Portability and Accountability Act of 1996, as amended (HIPAA). In many cases, we process patient information under contracts with our customers and our rights to use and disclose this information is typically identified in our contracts. As a result, patient information must not be accessed by, used by, or disclosed to unauthorized persons, either within or outside the Company, and may only be used as permitted under our policies, applicable law, and our agreements. All employees with access to patient information are bound by strict ethical and legal restrictions on the use and disclosure of patient information. No individual may disclose this information to unauthorized persons, including information learned from medical records, patient accounts, management information systems, or any other confidential sources during the course of his/her work. In addition, no employee may access or use patient information that they do not have a "need to know" to carry out their job duties.

18. *Records Management*

In the course of our business, we produce and receive large numbers of records, both paper and electronic. Employees are required to comply with Outset's policies regarding how long to retain Company records and when and how to dispose of them, in particular, our Corporate Record Retention Policy. This policy documents our commitment to establish retention periods for Company records, informs you about your obligations regarding the retention and destruction of Company records, and establishes destruction periods for key Company records.

From time to time, you may be notified, at the direction of the Legal department, that documents and records in your possession are relevant to a threatened or pending dispute, claim, litigation, audit, investigation or, where required by applicable data privacy law, a request by a data subject to exercise their data subject rights. In these cases, you must not alter, delete or destroy the relevant records, and are required to follow the guidelines set forth in the notification, until notified otherwise by the Legal department. This may require you to affirmatively preserve from destruction all relevant records that, without intervention, would automatically be destroyed or erased (such as emails and chat transcripts). Destruction of such records, even if inadvertent, could seriously prejudice Outset.

19. *Cybersecurity*

At Outset, we strive to protect the confidentiality, integrity and availability of the personal data entrusted to us and Company data. Our cybersecurity program is designed to prevent, detect, contain and mitigate reasonably foreseeable cybersecurity threats such as unauthorized access, damage, attack, or other

events that may expose Outset to reputational, contractual, regulatory, economic, privacy, or other risks. Any actions that compromise the cybersecurity of Outset systems may put Outset at significant risk. Additionally, cybersecurity incidents may pose a risk to the confidentiality, integrity, or availability of customer or patient data.

Protection from cybersecurity risks requires everyone with access to Outset systems to be aware of potential risks, to comply with training and instruction, to interact with Outset systems with care and caution, and to immediately report any actual or suspected cybersecurity incidents.

We have operationalized key processes to help us identify, assess, manage, and mitigate reasonably foreseeable risks from potential cybersecurity threats. We also have put in place an incident response plan which establishes a framework designed to enable us to respond to cybersecurity incidents in a consistent, timely and effective manner. If you are involved in a cybersecurity investigation, you will be expected to fully cooperate by providing truthful, accurate and complete information and complying with any applicable instructions provided by the IT department or the head of cybersecurity.

20. *Promoting our Products*

We are committed to promoting Outset products truthfully, accurately and with integrity. Executing on this commitment not only helps ensure that our promotional activities comply with applicable laws and regulations, but it also enables our customers to make informed decisions about the best treatment for their patients, upholds our reputation and helps build trust and confidence in our products.

In support of this commitment, we have developed policies and procedures that define acceptable and unacceptable advertising, sales support, training and other promotional practices for Outset devices in the United States. Consistent with these policies, when promoting our products and services, it is your responsibility to:

- Promote Outset products and services only for their U.S. Food and Drug Administration ("***FDA***")-cleared uses;
- Refrain from promoting, discussing or referring to uncleared, unapproved or off-label use of Outset products or services;
- Comply with all specific conditions of clearance for the product or service being promoted;
- Accurately represent our products and services in way that is truthful, accurate, not misleading, and that provides a fair and balanced description of the benefits and risks;
- Make statements that are substantiated by appropriate evidence (e.g., instructions-for-use, verification and validation testing, clinical study reports, or other reports requiring a similar rigorous process of review and approval);
- Use only promotional materials that have been developed, reviewed and approved in accordance with applicable Outset policies, including our Promotional Material Procedure; and
- Refrain from changing approved materials or creating your own promotional materials, which increases the risk of inconsistency with FDA-cleared labeling information.

21. *Safe and Fair Workplace*

At Outset, we are committed to creating and nurturing an inclusive, safe and fair workplace, where everyone feels respected, valued and included. In support of this commitment:

- We embrace diversity and equal opportunity in an intentional way. We are committed to building a team that represents a variety of backgrounds, perspectives and skills. We believe that creating an environment where employees feel comfortable to speak up and share ideas means we all do great work.

- We are committed to treating each employee as an individual who can succeed in employment based on effort, ability and performance. Our policies prohibit discrimination based on race, color, sex, gender, gender identity or expression, religion, creed, national origin, ancestry, alienage or citizenship status, veteran or military status, pregnancy, childbirth or related medical conditions, age, medical condition, genetic information, marital or registered domestic partner status, sexual orientation, mental or physical disability, political belief, or any other basis protected by law ("***Protected Characteristic***").

- Harassment against individuals because of any Protected Characteristic is inconsistent with our philosophy of fair treatment to all employees and is strictly prohibited both by law and by Outset policy. Outset does not tolerate any conduct prohibited by this policy from anyone while at work or engaged in Outset's business, including from other employees, vendors, customers, independent contractors, and other business associates.

- At Outset, safety is a priority and is part of everyone's job. We are committed to providing a safe workplace and complying with applicable health and safety laws and regulations. We strictly prohibit any violent or threatening behavior on our premises or during any work-related activities.

For additional guidance on our workplace policies, please refer to our Culture Book.

22. *Waivers*

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or, to the extent permitted by Nasdaq rules and our Corporate Governance Guidelines, a committee of the Board and will be disclosed to stockholders as required by applicable laws, rules and regulations.

23. *Compliance Standards and Procedures*

Compliance Resources

To facilitate compliance with this Code and other Company compliance policies, we have implemented a program of Code awareness, training and review. The Chief Compliance Officer will oversee this program. The Chief Compliance Officer is a person to whom you can address any questions or concerns. In addition to fielding questions or concerns with respect to potential violations of this Code, the Chief Compliance Officer is responsible for:

- investigating possible violations of the Code;

- training new employees in Code policies;

- conducting periodic training sessions to refresh employees' familiarity with the Code;

- distributing copies of the Code periodically to each employee with a reminder that each employee is responsible for reading, understanding and complying with the Code;

- updating the Code as needed and alerting employees to any updates, with appropriate approval of the Board of Directors, as appropriate, to reflect changes in the law, Company operations and in recognized best practices, and to reflect the Company's experience; and

- otherwise promoting an atmosphere of responsible and ethical conduct.

Your most immediate resource for any matter related to the Code is your supervisor. He or she may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with the Chief Compliance Officer. If you are uncomfortable speaking with the Chief Compliance Officer for any reason, please contact the CFO. Of course, if your concern involves potential misconduct by another person and relates to questionable accounting or auditing matters under the Company's Whistleblower Policy, you may report that violation as set forth in such policy.

Clarifying Questions and Concerns; Reporting Possible Violations

If you encounter a situation or are considering a course of action and its appropriateness is unclear, discuss the matter promptly with your supervisor or the Chief Compliance Officer; even the appearance of impropriety can be very damaging and should be avoided.

If you are aware of a suspected or actual violation of laws, regulations, the Code or any other Company policy, you have a responsibility to report it. You are expected to promptly provide a compliance resource with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation. Further, the Company encourages and expects each of us to report when we feel we are being pressured to compromise standards that may lead to a potential violation. Please report these matters directly to your supervisor or the Chief Compliance Officer.

Whether you choose to speak with your supervisor or the Chief Compliance Officer, you should do so without fear of any form of retaliation. The Company does not tolerate retaliation in any form against anyone who in good faith reports suspected violations or unethical behavior or who participates in an investigation regarding suspected violations or unethical behavior. Making a report in "good faith" means that you have provided all the information you have and that you reasonably believe there has been a possible violation of applicable law, regulation, rule or standard, this Code or any other Company policy, even if your report turns out to be unsubstantiated. If you feel that you have been retaliated against in any manner whatsoever, please notify Legal or People Operations immediately. Those who engage in retaliation will be subject to disciplinary action up to and including termination.

If for any reason you do not wish to discuss suspected violations or unethical behavior directly with the Company, please contact the Company's Toll-Free Hotline (the "***Hotline***"). Calls may be made for any reason at any time, around the clock. In order to provide additional assurance of anonymity, all Hotline calls are taken by a trained third-party vendor. The toll free number to call in North America is 877-306-7946. If you are outside North America, or if you prefer to use the internet, you may voice your concerns by filling out the web form located at https://www.whistleblowerservices.com/OM.

Supervisors must promptly report any complaints or observations of Code violations to the Chief Compliance Officer. If you believe your supervisor has not taken appropriate action, you should contact the Chief Compliance Officer directly. The Chief Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your supervisor may conduct any preliminary investigation, unless authorized to do so by the Chief Compliance Officer. Your cooperation in the investigation will be expected. As needed, the Chief Compliance Officer will consult with legal counsel, the People Operations department and/or Audit Committee of the Board of Directors. It is our policy to employ a fair process by which to determine violations of the Code.

With respect to any complaints or observations of violations that may involve accounting, internal accounting controls and auditing concerns, under the Company's Whistleblower Policy, the Chief Compliance Officer shall promptly inform the Audit Committee, and the Audit Committee shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken. If a potential violation is reported via the confidential hotline or email address as provided under the Whistleblower Policy, the Audit Committee will be notified automatically and directly.

If any investigation indicates that a violation of the Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

24. *Protected Rights*

Nothing in this Code (i) is intended to interfere with any employee rights that are provided or protected by laws, (ii) restricts employees from engaging in activities that are protected under the National Labor Relations Act or similar laws and regulations, such as protected collective bargaining or discussing your own wages or other terms of employment, or (iii) prohibits any employee from filing a complaint or reporting a concern to a governmental agency or regulatory entity if you have the legal right to do so.