

RA MEDICAL SYSTEMS, INC.
CODE OF ETHICS AND CONDUCT

(Adopted on July 13, 2018 and effective upon the effectiveness of the registration statement relating to the Company's initial public offering.)

Overview of the Code

Ra Medical Systems' reputation for honesty and integrity is among our most important assets. The Ra Medical Systems, Inc. Code of Ethics and Conduct, which may be referred to as the "**Code**," is designed to provide you with a clear understanding of the conduct we expect from all our employees, officers, and directors. The Code applies to all employees, officers, and directors of Ra Medical Systems, Inc. and its subsidiaries (unless otherwise specified, collectively referred to in the Code as "**Ra Medical**").

You are required to review the Code carefully. All new employees and directors of Ra Medical must execute an acknowledgement of the Code. Existing employees and directors may be asked from time to time to provide the Human Resources Department (including the Company's outside Human Resources Department, if applicable) with a similar acknowledgement. Failure to comply with the Code may result in disciplinary or enforcement action, which may include termination of employment, consistent with applicable laws.

Purposes of the Code

We have adopted and implemented the Code to deter wrongdoing and promote the following:

- Honest and ethical conduct, including (i) the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (ii) the ethical conduct of our business; and (iii) the ethical management of our relationships and transactions with customers, vendors, and anyone with whom we conduct business;
- Full, fair, accurate, timely, and understandable disclosure in reports and documents we file with, or submit to, the U.S. Securities and Exchange Commission and in other public communications we make;
- Compliance with applicable governmental laws, rules, and regulations;
- Prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
- Accountability for adherence to the Code.

Highlights of the Code

The most important principal embodied in the Code is that as an employee or director of Ra Medical, you are our representative, and you must act on behalf of Ra Medical in all circumstances with honesty and integrity, and in conformity with all applicable laws and regulations. Key requirements of the Code include those listed below.

- You must at all times conduct yourself and any business you are conducting on Ra Medical's behalf in compliance with all applicable laws or regulations.
- You must avoid conflicts of interest or the appearance of conflicts of interest.
- You must ensure that every business or financial record that you prepare or are involved with, whether related to internal or external transactions, is prepared timely and accurately. You must never falsify any Re Medical document or business record, take any other action that distorts the true nature of any transaction, or fail to report to appropriate personnel any information that is necessary to ensure that Ra Medical properly records and accounts for every business transaction.
- If you are involved in preparation of our financial statements and reports or other public disclosures, you must use all reasonable efforts to ensure that all information and disclosures are full, fair, accurate, timely, and complete.
- You may not use assets of Ra Medical, including its confidential information, for your personal business or benefit.
- You must deal with Ra Medical's customers, suppliers, and other third parties with whom Ra Medical has relationships, and with Ra Medical's competitors, fairly and at arm's length and in compliance with all applicable laws, including those relating to competitive practices.
- You must protect Ra Medical's proprietary information, as well as the proprietary information of third parties that Ra Medical may obtain, and you must not use any such information for your personal benefit or the benefit of third parties not associated with Ra Medical.
- You must never bribe or attempt to bribe or improperly influence a government official.
- You should promptly report violations or suspected violations of the Code, including requests by any other employee or colleague to violate the Code, or any threats or retaliation against someone who in good faith has reported a potential violation or who is cooperating in good faith in any investigation. If you are located in and engaged by Ra Medical in the U.S., you must report violations or suspected violations of the Code.
- Violating the Code may result in disciplinary and/or enforcement action, which may include termination of employment, consistent with applicable laws.

Your Responsibilities

You are responsible for reading and understanding the Code. You must, at all times, comply with the Code, both in letter and in spirit. Ignorance of the Code will not excuse you from its requirements.

You are responsible for conforming your conduct to the Code. You must comply with the Code as well as other applicable policies of Ra Medical. You will not be permitted to rely on technical arguments that an action was within the letter of the Code if it was clearly not within the spirit or intent of the Code.

You are responsible for seeking guidance if you have questions about the Code or if a circumstance or situation arises where you are uncertain as to whether an action is unethical or improper. Some situations may seem ambiguous. No Code of Conduct or other policy can address every circumstance. Ra Medical encourages you to trust your instincts, as you will be responsible for your actions. In evaluating a situation, you should obtain all relevant facts, assess the responsibilities and roles of those involved, and use your own judgment and common sense to evaluate whether an action is unethical or improper. You may discuss with your immediate manager any questions or concerns you have about the Code or other policies of Ra Medical and whether or not any proposed course of conduct or dealing is appropriate. If, for any reason you are uncomfortable discussing it with your manager, you should follow the procedures in Section III (Accountability and Reporting).

You are responsible for assisting Ra Medical in enforcing the Code and for reporting potential violations. You should be alert to possible violations of the Code. Violations may occur as a result of someone’s intentional act or, in some cases, because of an unintentional act, oversight, or error. You should promptly report suspected violations regardless of whether you believe the violation is or was intentional. (If you are located in the U.S., you are required to report all possible violations of the Code). Any report of a suspected violation of law or of this Code should be made to a local supervisor or local Human Resources Representative.

If for any reason you are not comfortable reporting locally, you have additional and alternative methods of reporting the nature of the report, as set forth below:

Nature of Report	Permissible Alternative Methods of Reporting
<p>All actual or suspected violations of the law, Ra Medical’s Insider Trading Policy or this Code, including but not limited to, all related or suspected violations of accounting policies, internal controls, auditing matter policies, financial record keeping policies, public disclosures, bribery and corruption policies and laws, or antitrust and competition policies and laws.</p>	<ol style="list-style-type: none"> 1. Write Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable), or General Counsel (if applicable) at Ra Medical’s principal executive offices located at 2070 Las Palmas Drive, Carlsbad, California 92011; 2. Call Ra Medical’s toll free hotline number at 1-800-916-7037, Company identifier 7633, or submit a report through the Company’s intranet at _____; or

Nature of Report	Permissible Alternative Methods of Reporting
	<p>3. Write or email the Audit Committee by sending a letter to: Chairman of the Ra Medical Audit Committee, c/o Ra Medical Systems, Inc., 2070 Las Palmas Drive, Carlsbad, California 92011, or email to: rimejrr@gmail.com, which will be delivered directly to members of the Audit Committee.</p>

Reports made through the hotline, to Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable) or General Counsel (if applicable), or to the Audit Committee of the Board of Directors, as permissible, may be made anonymously or by identifying oneself. Because it may be more difficult to thoroughly investigate reports that are made anonymously, you are encouraged to share your identity when reporting rather than reporting anonymously. Furthermore, if the applicable legislation of the country where you are located prevents individuals from sending anonymous reports, reports shall be made exclusively by identifying oneself. All reports, whether identified or anonymous, will be treated confidentially to the extent consistent with applicable law.

All information will be dealt with in accordance with applicable laws. Appropriate corrective action, including, but not limited to, termination of employment, will be taken as warranted in Ra Medical’s judgment and consistent with applicable law.

In addition, you should review Ra Medical’s Complaint Procedures for Accounting and Auditing Matters, which is available on Ra Medical’s internal website or upon written request to Ra Medical’s Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable). **It is against Ra Medical policy and this Code to retaliate in any manner, including, but not limited to, via harassment or threats, against any person who has in good faith reported a suspected violation of this Code or any other Ra Medical policy or who has participated in good faith in an investigation.** Conversely, any bad faith reporting could lead to disciplinary sanctions, up to and including dismissal.

Part A and Part B of this Code taken together are intended to satisfy the definition of a “code of ethics” as set forth in Item 406 of Regulation S-K promulgated under the Securities Act of 1933, as amended, and the Securities Exchange Act of 1934, as amended. As such, any waiver or implicit waiver of the provisions of Part A or Part B that relates to any element of the code of ethics definition enumerated in Item 406(b) of Regulation S-K for certain

executive officers and financial personnel must be publicly disclosed in accordance with applicable rules and regulations.

If a conflict exists between this Code and applicable laws or regulations, the stricter of the two should be applied to the extent permitted under applicable laws and regulations. Any questions or comments about the application of these laws or the Code should be directed to Ra Medical's Chief Financial Officer, Head of Human Resources (including the Company's outside Head of Human Resources, if applicable) or General Counsel (if applicable).

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PART A: OVERVIEW

I. PURPOSE AND SCOPE

This Code of Ethics and Conduct (the “**Code**”) summarizes the ethical standards and key policies that guide the conduct of Ra Medical Systems, Inc. and its subsidiaries (collectively, “**Ra Medical**”) in certain critical areas. We believe our values define who we are as a company and as employees of Ra Medical.

The purpose of this Code is to promote ethical conduct and deter wrongdoing. The policies outlined in this Code are designed to ensure that Ra Medical’s employees, including its officers (“**employees**”), and members of its board of directors (“**directors**”) act in accordance with not only the letter but also the spirit of the laws and regulations that apply to Ra Medical’s business. Ra Medical expects its employees and directors to exercise good judgment to uphold these standards in their day-to-day activities and to comply with all applicable policies and procedures in the course of their relationship with Ra Medical. The Code applies to all employees and directors of Ra Medical.

Employees and directors are expected to read the policies set forth in this Code and ensure that they understand and comply with them. The Code does not cover every issue that may arise, but it provides general guidelines for exercising good judgment. Employees and directors should refer to Ra Medical’s other policies and procedures for implementing the general principles set forth below. Any questions about the Code or the appropriate course of conduct in a particular situation should be directed to Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable), or General Counsel (if applicable). Any violations of laws, rules, regulations or this Code should be reported immediately as set forth in Section III (Accountability and Reporting). Employees and directors located in and engaged by Ra Medical in the U.S. are required to report violations of laws, rules, regulations, or this Code as set forth in Section III (Accountability and Reporting).

Ra Medical will not allow retaliation against an employee or director for such a report made in good faith or against persons who cooperate in good faith in an investigation. Employees and directors who violate this Code, including, but not limited to, this anti-retaliation provision, will be subject to disciplinary and/or enforcement action, which may include termination of employment, consistent with applicable laws.

Each employee and director must sign the acknowledgement form at the end of this Code and return the form to Ra Medical’s Human Resources Department indicating that the employee or director has received, read, and understood the Code. For employees, the signed acknowledgment form will be placed in the individual’s personnel files.

Part A and Part B of this Code are, together, intended to constitute a “code of ethics” as described in Item 406 of Regulation S-K promulgated under the Securities Act of 1933, as amended, and the Securities Exchange Act of 1934, as amended. Part C of the Code and the

entire portion of the Code preceding Part A are explicitly deemed not to be part of Ra Medical's "code of ethics" for the purposes of Item 406 and any related statutes or regulations.

II. STANDARDS OF CONDUCT

Ra Medical expects all employees and directors to act with the highest standards of honesty and ethical conduct. Ra Medical considers honest conduct to be conduct that is free from fraud or deception and is characterized by integrity. Ra Medical considers ethical conduct to be conduct conforming to accepted professional standards of conduct. Ethical conduct includes the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, as discussed below.

III. ACCOUNTABILITY AND REPORTING; IDENTIFYING VIOLATIONS

Reporting Procedures¹

Ra Medical expects employees to assist Ra Medical in enforcing the Code and to report possible violations to appropriate personnel. Violations may occur as a result of someone's intentional act or, in some cases, because of an unintentional act, oversight, or error. Employees and directors should report suspected violations regardless of whether they believe the violation is or was intentional, and employees and directors located in the U.S. are required to report all possible violations of the Code. Any report of a suspected violation of law or of this Code should be made to a local supervisor or local Human Resources Representative.

If for any reason you are not comfortable reporting locally, you have additional and alternative methods of reporting, as set forth below:

¹ Nothing in this policy, or any other Company policy, limits or prohibits an employee or director from engaging for a lawful purpose in any "Protected Activity," as defined in the Confidentiality Section of this policy.

Nature of Report	Permissible Alternative Methods of Reporting
<p>All actual or suspected violations of the law, Ra Medical’s Insider Trading Policy or this Code, including but not limited to, all related or suspected violations of accounting, internal controls, auditing matters, financial record keeping, public disclosures, bribery and corruption, or antitrust and competition.</p>	<ol style="list-style-type: none"> 1. Write Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable) or General Counsel (if applicable) at Ra Medical’s principal executive offices located at 2070 Las Palmas Drive, Carlsbad, California 92011; 2. Call Ra Medical’s toll free hotline number at 1-800-916-7037, Company identifier 7633, or submit a report through the Company’s intranet at _____; or 3. Write or email the Audit Committee by sending a letter to: Chairman of the Ra Medical Audit Committee, c/o Ra Medical Systems, Inc., 2070 Las Palmas Drive, Carlsbad, California 92011, or email to: rimejrr@gmail.com, which will be delivered directly to members of the Audit Committee.
<p>All actual or suspected violations of Ra Medical’s Insider Trading Policy or this Code, including but not limited to, all related or suspected violations of accounting, internal controls, auditing matters, financial record keeping, public disclosures, bribery and corruption, or antitrust and competition.</p>	<ol style="list-style-type: none"> 1. Write Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable) or General Counsel (if applicable) at Ra Medical’s principal executive offices located at 2070 Las Palmas Drive, Carlsbad, California 92011; 2. Call Ra Medical’s toll free hotline number at 1-800-916-7037, Company identifier 7633, or submit a report through the Company’s intranet at _____; or 3. Write or email the Audit Committee by sending a letter to: Chairman of the Ra Medical Audit Committee, c/o Ra Medical Systems, Inc., 2070 Las Palmas Drive, Carlsbad, California 92011, or email to: rimejrr@gmail.com, which will be delivered directly to members of the Audit Committee.

Nature of Report	Permissible Alternative Methods of Reporting
All actual or suspected violations related to accounting, internal controls, auditing matters, financial record keeping, financial public disclosures, bribery and corruption, or antitrust and competition.	<ol style="list-style-type: none"> 1. Write Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable) or General Counsel (if applicable) at Ra Medical’s principal executive offices located at 2070 Las Palmas Drive, Carlsbad, California 92011; 2. Call Ra Medical’s toll free hotline number at 1-800-916-7037, Company identifier 7633, or submit a report through the Company’s intranet at _____; or 3. Write or email the Audit Committee by sending a letter to: Chairman of the Ra Medical Audit Committee, c/o Ra Medical Systems, Inc., 2070 Las Palmas Drive, Carlsbad, California 92011, or email to: rimejjr@gmail.com, which will be delivered directly to members of the Audit Committee.

Reports made through the hotline, to Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable) or General Counsel (if applicable), or to the Audit Committee of the Board of Directors, as permissible, may be made anonymously or by identifying oneself. Because it may be more difficult to thoroughly investigate reports that are made anonymously, employees and directors are encouraged to share their identity when reporting rather than reporting anonymously. Furthermore, if the applicable legislation of the country where you are located prevents individuals from sending anonymous reports, reports shall be made exclusively by identifying oneself. All reports, whether identified or anonymous, will be treated confidentially to the extent consistent with applicable law.

All information will be dealt with in accordance with applicable laws. Appropriate corrective action will be taken as warranted in Ra Medical’s judgment and consistent with applicable law.

In addition, you should review Ra Medical’s Complaint Procedures for Accounting and Auditing Matters, which is available on Ra Medical’s internal website or upon written request to Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable) or General Counsel (if applicable). **It is against Ra Medical policy and this Code to retaliate in any manner, including with harassment or threats, against any person who has in good faith reported a suspected violation of this Code or any other Ra Medical policy.** Conversely, any bad faith reporting could lead to disciplinary sanctions, up to and including dismissal.

Identifying Violations

To assist employees in the day-to-day monitoring of our business conduct, the following is a partial list of facts or circumstances that could suggest a violation of the Code. This list is not exhaustive, but provides examples of situations that employees should avoid and that should be reported.

- Oral or written agreements or understandings with customers modifying payment terms, rights of cancellation, or product return, or any other term or condition, where such modification is not part of the terms and conditions of sale communicated to the Finance Department for purposes of recording the transaction;
- Improper or excessive payments relating to inaccurate or misleading time sheets, expense reports, billing records, or similar documents;
- Improper or excessive payments to agents, consultants, or professional service providers, particularly where the service providers are new or unknown to Ra Medical and have not been adequately investigated or have not signed contracts or letters of engagement as required by Ra Medical's policies, or where an association between Ra Medical and the third party would be embarrassing if exposed;
- Improper or excessive payments for "miscellaneous expenses" not properly categorized;
- Payroll-related expenditures, bonuses, awards, and gifts given to or by Ra Medical employees without proper approval and adequate documentation;
- Payments made in cash or checks drawn to cash, or bearer or bank accounts or other property not titled in the name of Ra Medical;
- Any payment or transfer to, or deposit with the bank account of, an individual or intermediary rather than the individual or company with which Ra Medical is doing business;
- Payments or billings made, or fees collected or paid, that are greater or less than normal payments, billings, or fees for the services provided or received and made at the request of a supplier or customer; or any payment made or received in an amount greater or less than, or for purposes other than, as described in supporting documentation;
- Unusual transactions occurring with non-functional, inactive, or shell subsidiaries or involving undisclosed or unrecorded assets or liabilities; and
- Any employment, consulting, or business relationship between a Ra Medical employee and another company, if such company is in a business that is the same as or related to Ra Medical.

IV. COMPLIANCE STANDARDS AND PROCEDURES

No code of ethics and conduct can replace the thoughtful behavior of an ethical employee or director or provide definitive answers to all questions. Since Ra Medical cannot anticipate every potential situation, certain policies and procedures have been put in place to help employees and directors approach questions or problems as they arise.

A. Designated Ethics Officer

Ra Medical's Chief Financial Officer has initially been designated as Ra Medical's Ethics Officer with responsibility for overseeing and monitoring compliance with the Code. Ra Medical's Chief Executive Officer will designate the Ethics Officer from time to time. The Ethics Officer reports directly to the Chief Executive Officer with respect to these matters and also will make periodic reports to Ra Medical's Audit Committee regarding the implementation and effectiveness of this Code as well as the policies and procedures put in place to ensure compliance with the Code.

B. Seeking Guidance

Employees and directors are encouraged to seek guidance from supervisors, managers, or other appropriate personnel when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding the Code should be brought to the attention of Ra Medical's Chief Financial Officer, Head of Human Resources (including the Company's outside Head of Human Resources, if applicable) or General Counsel (if applicable).

C. Reporting Violations

If an employee or director knows of or suspects a violation of the Code, or of applicable laws and regulations, the employee or director should report it immediately as described under Section III (Accountability and Reporting). Employees and directors located in and engaged by Ra Medical in the U.S. are required to report possible violations of the Code, and of applicable laws and regulations, as set forth under Section III (Accountability and Reporting).

Anyone who believes that questionable accounting or auditing conduct or practices have occurred or are occurring should refer to Ra Medical's Complaint Procedures for Accounting and Auditing Matters, which is available on Ra Medical's internal website or upon written request to Ra Medical's Chief Financial Officer, Head of Human Resources (including the Company's outside Head of Human Resources, if applicable) or General Counsel (if applicable).

D. No Retaliation

Any employee or director who observes possible unethical or illegal conduct is encouraged to report such concerns. Reprisal, threats, retribution, or retaliation against any person who has, in good faith, reported a violation or suspected violation of law, this Code, or other Ra Medical policies, or against any person who, in good faith, is assisting in any investigation or process with respect to such a violation, is prohibited.

Any employees or directors involved in retaliation may be subject to serious disciplinary and/or enforcement action by Ra Medical, consistent with applicable laws. Furthermore, Ra

Medical could be subject to criminal or civil actions for acts of retaliation against employees who report violations.

E. Investigations

Reported violations will be promptly investigated. The applicable Board of Directors or its designated committee will be responsible for investigating violations and determining appropriate action for matters involving members of such Board of Directors, executive officers, or managing directors. The Board of Directors or its designated committee may designate others to conduct or manage investigations on its behalf and recommend appropriate action. Subject to the general authority of the Board of Directors to administer this Code, the Ethics Officer and the Chief Executive Officer will be jointly responsible for investigating violations and determining appropriate action for other U.S.-based employees and directors, and, typically, the local managing director will be responsible for investigating non-financial violations and determining appropriate action for non-U.S. based employees and directors. Ra Medical's General Counsel, the Chief Executive Officer, Chief Financial Officer, and local managing directors may designate others to conduct or manage investigations on their behalf and recommend appropriate action. For reports of suspected violations lawfully reaching the Board of Directors, the Board of Directors reserves the right to investigate violations and determine appropriate action on its own or to designate others to do so in place of, or in addition to, the Ethics Officer. Employees and directors are expected to cooperate fully with any investigation made by Ra Medical into reported violations.

F. Discipline/Penalties

Employees and directors who violate the laws or regulations governing Ra Medical's business, this Code, or any other Ra Medical policy, procedure, or requirement may be subject to disciplinary and/or enforcement action, which may include termination of employment, consistent with applicable laws.

Furthermore, violations of some provisions of this Code are illegal and may subject the employee or director to civil and criminal liability.

G. Rights of Individuals Located in the EU

1. If you are located in the EU, the following section applies to you. In order to exercise your rights, please use the instructions and contact us at the international local access number indicated on the Ra Medical intranet site for your applicable country.

2. You hereby acknowledge that reports of violations will include personal data and that the Company has a legitimate interest in processing such personal data for the purposes of managing the reports, carrying out any necessary investigation about a potential violation of the Code and, where applicable, subject the violator to individual criminal or civil liability, as well as to discipline and/or enforcement action by the Company. The Company will store the personal data related to violations of the Code as long as necessary to perform the investigation and as required to exercise the correspondent legal and/or disciplinary actions, in accordance with the local applicable legislation.

3. If you initiated a report, you have the right to access the personal data we maintain about you in connection with your report. You also have the right to request the portability, rectification, blocking or deletion of any outdated or incorrect personal data in accordance with European data protection law and its implementation into EU Member State law. However, the exercise of some of those rights may be restricted in order to ensure the protection of the rights and freedoms of others involved in or affected by your report. This restriction will be applied on a case-by-case basis. In certain jurisdictions, you are also entitled to issue data protection related claims before the local data protection authority of your country.

4. If you are the subject of an accusation raised, you will be contacted by an appropriate person within the Company as soon as possible after any relevant evidence is first collected. We will inform you about: (a) the Company's entity or unit responsible for operating the scheme, including the entity or unit of the Company which will process the personal data; (b) the allegations against you; (c) the persons, departments or entities that may receive information or reports relating to the allegations; and (d) how you can exercise any applicable rights of access, rectification, blocking or deletion of personal data. For example, you are entitled to know what personal data the Company has recorded about you, and have the right to contest the accuracy of that data.

5. In some countries and depending on applicable data protection law, you may also have the right to object to certain processing for compelling and legitimate reasons in relation to your special situation, and the right not to be subject to an automated individual decision which produces legal effects and the right to go to court.

6. You will not, however, be told the identity of the person who submitted the report, unless we are obliged to disclose the identity of that person as a result of judicial action or in order to comply with local law requirements.

H. International Data Transfers

Many countries have privacy laws that govern the appropriate collection and use of personal information, which includes any information relating to an identifiable individual such as an address or government identification number. Ra Medical is committed to protecting the reasonable privacy expectations of everyone with whom it does business, including its employees, and will take all appropriate steps to comply with applicable security and privacy requirements under Company policy and applicable law. If you are located in the EU or certain other jurisdictions outside the United States, you hereby acknowledge that any personal data included in a report will be transferred to the Company's headquarters in the United States, a country that does not offer a level of data protection equivalent to that provided in the EU and may not offer a level of data protection equivalent to that provided your particular jurisdiction.

V. AMENDMENT, MODIFICATION AND WAIVER

This Code may be amended or modified by the Board of Directors or a committee of the Board of Directors. Any amendments of Part A or Part B of this Code must be promptly disclosed to stockholders if and as required by law or the rules of the stock exchange or over the counter trading system on which Ra Medical's stock is traded or quoted.

Any waiver of the provisions of Part A or Part B of this Code for a director, executive officer, and any financial or accounting officer at the level of the principal accounting officer or controller or above, may be made only by the Board of Directors, and must be promptly disclosed to stockholders if and as required by law or the rules of the stock exchange or over the counter trading system on which Ra Medical's stock is traded or quoted. Waivers with respect to other employees may be made only by Ra Medical's Chief Executive Officer or the Ethics Officer.

Any waiver of this Code with respect to a conflict of interest transaction required to be disclosed pursuant to Item 404 of Regulation S-K promulgated under the Securities Act of 1933, as amended, must be approved in advance by Ra Medical's Audit Committee.

PART B: ETHICS PROVISIONS

VI. FINANCIAL RECORDS AND PUBLIC DISCLOSURE

Every Ra Medical financial record – including sales records, time sheets, expense reports, books and ledgers, and other financial data and records – must be accurately and timely prepared and must be prepared in accordance with all applicable laws, principles, and standards. The integrity of our financial transactions and records is critical to the operation of our business and to maintaining the confidence and trust of our stockholders, customers, suppliers, and employees.

General Principles Applicable to Employees

Each employee having any responsibility for, or involvement in, financial reporting or accounting must have an appropriate understanding of relevant accounting and financial reporting principles, standards, laws, rules, and regulations as well as Ra Medical's financial and accounting policies, controls, and procedures.

Each employee having any responsibility for, or involvement in, the customer sales and support process or managing relationships with Ra Medical's vendors must understand the accounting and financial reporting implications of Ra Medical's transactions with these parties. All such employees should consult with the Finance Department to discuss any requests for non-standard terms or conditions. All such employees are responsible for ensuring the accuracy and completeness of all documentation relating to customer sales and support or vendor transactions. **The terms and conditions of any transaction between Ra Medical and any customer or vendor must be fully and completely reflected in the documentation governing the transaction. The existence of oral or written agreements or understandings of any kind that are not part of the documentation relating to the transaction and that are not reported to the Finance Department as part of such transaction is an absolute violation of this Code and may constitute grounds for immediate termination of employment, consistent with applicable laws.** Examples of such agreements or understandings include (but are not limited to) requests for payment terms that differ from those reflected in purchase orders or other documentation or rights to return or cancel orders or products that are not reflected in the documentation. **Employees involved in customer and vendor transactions are responsible for consulting with the Finance Department if any customer or vendor requests that Ra Medical consent to any term or condition that would not be fully reflected in the documentation relating to the transaction.**

Even employees not directly involved in financial reporting, accounting, sales, or purchasing will likely come into contact with financial records or reports or with other documents on which employees preparing financial statements will depend. These may include vouchers, time sheets, invoices, and/or expense reports. We expect every employee, regardless of the employee's familiarity or involvement with finance or accounting matters or principal job responsibilities or functions, to use all reasonable efforts to ensure that every business record or report with which the employee deals is accurate, complete, reliable, and timely submitted.

Each employee is specifically required to use all reasonable efforts to ensure the following provisions of the Code are satisfied:

- All transactions must be recorded and classified in the proper accounting period and in the appropriate account and department. Delaying or prepaying invoices to meet budget goals is a violation of the Code.
- No employee may falsify any document or distort the true nature of any transaction.
- All transactions must be supported by complete and accurate documentation.
- Any information or statement in any report, filing, certification, application, or similar document that Ra Medical may submit to any governmental authority or entity must be full, fair, accurate, timely, understandable, and complete.
- Employees must cooperate fully with any investigation into the accuracy, completeness, and timeliness of Ra Medical's financial records.
- To the extent estimates and accruals are required to be made in Ra Medical's reports and records, employees involved with such estimates and accruals will base them on good faith judgments supported by appropriate documentation.
- No payment may be made to any supplier, vendor, or other person, other than the person or firm that actually provided goods or services to Ra Medical, unless the payment is approved in advance by Ra Medical's Chief Financial Officer.

Employees Controlling Ra Medical Funds

Every employee of Ra Medical is personally responsible for all Ra Medical funds over which the employee exercises control. No employee may allow any agent or contractor of Ra Medical to exercise control over any funds of Ra Medical without the prior approval of Ra Medical's Chief Financial Officer.

Dealing With Auditors

Our auditors have a duty to review our records in a fair and accurate manner. All employees must cooperate fully with independent and internal auditors in good faith and in accordance with law. No employee may fraudulently induce, or influence, coerce, manipulate, or

mislead, our independent or internal auditors regarding any financial record, process, control, procedure or other matter.

Public Communications and Reports

Ra Medical files reports and other documents with the Securities and Exchange Commission, the New York Stock Exchange, and other governmental and regulatory agencies. In addition, from time to time, Ra Medical makes other public announcements, such as issuing press releases.

Employees involved in the preparation of these reports, documents, or announcements are expected to use all reasonable efforts to ensure that Ra Medical's disclosures are complete, accurate, objective, relevant, timely and understandable. In addition, employees are expected to comply with Ra Medical's disclosure controls and procedures, which are designed to ensure full, fair, accurate, timely, and understandable disclosure in our public reports and communications.

If an employee believes that any public disclosure by Ra Medical is materially false or misleading, if any employee becomes aware of material information that the employee believes should be disclosed to the public, or if any employee believes that questionable accounting or auditing conduct or practices have occurred or are occurring, the employee should follow the reporting procedures in Section III (Accountability and Reporting).

Intentional Misconduct

Intentional misrepresentations of Ra Medical's financial performance or any other action by an employee that intentionally compromises the integrity of Ra Medical's reports (financial or otherwise), records, or public disclosures is a specific and extremely severe violation of this Code. Any violation of this Code arising from an intentional misrepresentation, including failure to report potential misrepresentations by others, will be viewed as severe misconduct and will be subject to severe penalties, which may include termination of employment, consistent with applicable laws. Examples of such intentional misconduct would include, but are not limited to, the following:

- Reporting any information or entering any information in Ra Medical's books, records, or reports that fraudulently or intentionally hides, misrepresents, or disguises the true nature of any financial or non-financial transaction;
- Agreeing orally or in writing to any term or condition of any transaction with a customer or vendor that is not reflected in the documentation provided to the Finance Department or failing to disclose to the Finance Department that any customer or vendor either intends to breach or otherwise fail to honor any term or condition as reflected in such documentation or has an understanding of any term or condition that is inconsistent with the understanding of Ra Medical and the Finance Department;
- Establishing any undisclosed or unrecorded fund, account, asset, or liability for any purpose;

- Entering into any transaction or agreement that accelerates, postpones, or otherwise manipulates the accurate and timely reporting of revenues and expenses;
- Intentionally misclassifying transactions as to accounts, business units, or accounting periods;
- Intentionally destroying or altering any document or record that the employee has been notified is subject to a legal hold; and/or
- Knowingly assisting others in any of the above.

VII. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Employees and directors must comply with all laws, rules, and regulations applicable to Ra Medical and its business, as well as applicable Ra Medical policies and procedures. Each employee and director must acquire appropriate knowledge of the legal requirements relating to the employee's duties sufficient to enable the employee to recognize potential problems and to know when to seek advice from the Ethics Officer. Violations of laws, rules, and regulations may subject the violator to individual criminal or civil liability, as well as to discipline and/or enforcement action by Ra Medical. These violations may also subject Ra Medical to civil or criminal liability or the loss of business.

Of particular importance is compliance with United States securities laws. Ra Medical has adopted an Insider Trading Compliance Program to help ensure compliance with these laws. Violations of those policies will be treated as violations of this Code.

Any questions as to the applicability of any law, rule, or regulation should be directed to the Ethics Officer.

VIII. CONFLICTS OF INTEREST

An employee's personal activities and relationships must not conflict, or appear to conflict, with those of Ra Medical. An employee's decisions and actions in the course of employment should be based on the best interests of Ra Medical, not based on the employee's own personal relationships or business and financial interests.

We expect each employee to evaluate the employee's personal relationships and activities to determine whether a conflict exists or could appear to exist and to avoid such relationships and activities. Any situation where it may be difficult for an employee to perform the employee's work impartially, objectively, or effectively and in the best interests of Ra Medical could suggest that a conflict exists.

Each employee is required to disclose immediately to a supervisor, the Finance Department, or the Human Resources Department if the employee becomes aware that any personal relationship or business or financial interest conflicts, or may appear to conflict, with those of Ra Medical. Supervisors with concerns that any actual or suspected conflict, whether

their own or related to a reporting employee, would violate the Code should contact the Finance Department or Human Resources Department.

Employee Conflicts

Conflicts arise in numerous situations, and it is not possible to categorize every potential conflict. Again, the employee is responsible for evaluating these situations and conferring with the employee's supervisor or appropriate finance or human resources personnel. Conflicts such as those relating to an employee's work schedule, duties, and responsibilities are specifically described in local policies, work rules, or handbooks. In connection with the Code, Ra Medical has also adopted the following conflicts policies relating to business or financial interests of employees (for the following purposes, "employee" does not include non-employee directors of Ra Medical):

- An employee may own up to 1% of the stock of a competitor, customer, or supplier of Ra Medical without obtaining prior approval so long as the stock is publicly traded and the employee has no discretionary authority in dealing with the competitor, customer, or supplier. If the employee proposes to purchase more than 1% of the stock of such competitor, customer, or supplier, if the company is not publicly traded, or if the employee has discretionary authority in dealing with the competitor, customer, or supplier, then the stock may only be purchased with the prior approval of Ra Medical's Chief Financial Officer or, in the case of any officer, the prior approval of the Audit Committee of the Board of Directors.
- An employee must disclose any financial interest the employee may have in a transaction between Ra Medical and a third party, and that interest must be approved by Ra Medical's Chief Financial Officer prior to the transaction or, in the case of an officer, by the Audit Committee. If the financial interest relates solely to the fact that a spouse or other relative works at the third party, then for an employee who is not a Ra Medical officer, no prior approval will be required unless the employee deals with the supplier or customer, or the spouse or significant other or other relative deals with Ra Medical. Nevertheless, the employee must still disclose to the employee's supervisor the potential interest in any proposed transaction of which the employee has knowledge.
- No employee may, directly or indirectly, exploit for personal gain any opportunities that are discovered through the use of Ra Medical property or information, or the employee's position with Ra Medical unless the opportunity is fully disclosed in writing to the Board of Directors, and the Board of Directors declines to pursue the opportunity.
- Loans from Ra Medical to any director or officer of Ra Medical or any relative of any officer or director of Ra Medical are prohibited. Loans to any other employee or employee relative must be approved in advance by the Board of Directors or a designated committee (excluding travel advances and similar payments made in connection with Ra Medical's business expense reimbursement policies).

- No employee may perform services as a director, employee, agent, or contractor for any competitor of Ra Medical while an employee of Ra Medical.
- No employee may perform any services as a director, employee, agent, or contractor for any Ra Medical customer or supplier, or any other entity that has a business relationship with Ra Medical, without the prior approval of Ra Medical's Chief Financial Officer or, in the case of any officer of Ra Medical, the prior approval of the Audit Committee. If applicable law requires approval to be given, approval will be given.
- An employee may, on the employee's own time, serve as an officer, director, or consultant to businesses that are not competitors, customers, or suppliers of Ra Medical, but any service must be disclosed to and approved by the employee's supervisor or, in the case of an officer, disclosed to and approved by the Audit Committee. In addition, such service must not otherwise interfere with the employee's responsibilities to Ra Medical. Notwithstanding the foregoing, an employee may serve on boards of charitable organizations or educational, political, community, or religious institutions so long as such service does not otherwise create a conflict of interest or interfere with the employee's responsibilities to Ra Medical.
- No employee may serve on the decision-making or rule-making panel of any local, regulatory, or advisory body of any governmental entity whose rules or decisions have application to Ra Medical's business activities, without the prior approval of the Audit Committee. An employee may serve in an elected or appointed public office, however, so long as the position does not create or appear to create a conflict of interest and does not interfere with the employee's responsibilities to Ra Medical.

The foregoing list of conflicts is not exclusive, and other situations or circumstances that are not listed could give rise to conflicts. It is the responsibility of each employee to identify potential conflicts and consult with the employee's supervisor or other appropriate personnel concerning conflicts.

Ra Medical may rescind any approval granted with respect to an actual or potential conflict of interest if Ra Medical determines it to be in the best interests of Ra Medical.

Additional Conflict Provisions Relating to Non-Employee Directors

Members of Ra Medical's Board of Directors who are not also employees have special responsibilities to Ra Medical but are also prominent individuals with substantial other responsibilities. Members of the Board will be required to disclose to other directors any personal, financial, business, or other economic interest they may have in any transaction submitted for approval by the Board and must recuse themselves from participating in any decision in which there exists a conflict of interest between their personal interests and the interests of Ra Medical. Each non-employee director must promptly inform Ra Medical if the non-employee director performs services as a director, employee, consultant, contractor, or agent for any customer, supplier, or other third party with whom Ra Medical has a business

relationship. No non-employee director may serve as a director, employee, consultant, contractor, or agent for any competitor of Ra Medical while acting as a director of Ra Medical.

IX. NO LOANS TO EXECUTIVE OFFICERS OR DIRECTORS

As indicated under “Conflicts of Interest,” it is the policy of Ra Medical not to extend or maintain credit, to arrange for the extension of credit, or to renew an extension of credit, in the form of a personal loan to or for any director or officer of Ra Medical. Any questions about whether a loan has been made to a director or officer in violation of this policy should be directed to the Ethics Officer.

X. CORPORATE OPPORTUNITIES

As indicated under “Conflicts of Interest” above, employees and directors are prohibited from:

- Personally taking for themselves opportunities that are discovered through the use of Ra Medical property or information or their positions with Ra Medical;
- Using Ra Medical property or information or their positions with Ra Medical for personal gain; and
- Competing with Ra Medical.

Employees and directors owe a duty to Ra Medical to advance its legitimate interests when the opportunity to do so arises.

XI. RECORDKEEPING

All of Ra Medical’s books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect the transactions and matters to which they relate and must conform both to applicable legal requirements and to Ra Medical’s system of internal controls. All assets of Ra Medical must be carefully and properly accounted for. The making of false or misleading records or documentation is strictly prohibited. Unrecorded funds or assets should not be maintained. Please refer also to the more detailed requirements under Section VI (Financial Records and Public Disclosure).

Ra Medical complies with all laws and regulations regarding the preservation of records. Records should be retained or destroyed only in accordance with Ra Medical’s document retention policies. Any questions about these policies should be directed to Ra Medical’s Chief Financial Officer, Head of Human Resources (including the Company’s outside Head of Human Resources, if applicable), or General Counsel (if applicable).

XII. DISCLOSURE

The information in Ra Medical’s public communications, including filings with the Securities and Exchange Commission, must be full, fair, accurate, timely, and understandable. All employees and directors are responsible for acting in furtherance of this policy. In particular, each employee and director is responsible for complying with Ra Medical’s disclosure controls

and procedures and internal controls for financial reporting. Any questions concerning Ra Medical's disclosure controls and procedures and internal controls for financial reporting should be directed to Ra Medical's Chief Financial Officer. Please refer also to the more detailed requirements under Section VI (Financial Records and Public Disclosure).

Anyone who believes that questionable accounting or auditing conduct or practices have occurred or are occurring should refer to Ra Medical's Complaint Procedures for Accounting and Auditing Matters, which is available on Ra Medical's internal website or upon written request to Ra Medical's Chief Financial Officer.

PART C: EMPLOYEE CONDUCT PROVISIONS

XIII. FAIR DEALING

Ra Medical seeks to excel while operating fairly and honestly, never through unethical or illegal business practices. Each employee and director should endeavor to deal fairly with Ra Medical's customers, suppliers, competitors, and employees. No employee or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices.

XIV. CUSTOMER RELATIONSHIPS

Employees must act in a manner that creates value for Ra Medical's customers and helps to build a relationship based upon trust. Ra Medical and its employees have provided products and services for many years and have built up significant goodwill over that time. This goodwill is one of Ra Medical's most important assets, and Ra Medical employees must act to preserve and enhance Ra Medical's reputation.

XV. SUPPLIER RELATIONSHIPS

Ra Medical's suppliers make significant contributions to Ra Medical's success. To create an environment where Ra Medical's suppliers have an incentive to work with Ra Medical, suppliers must be confident that they will be treated lawfully and in an ethical manner. Ra Medical's policy is to purchase supplies based on need, quality, service, price, and terms and conditions. Ra Medical's policy is to select significant suppliers or enter into significant supplier agreements through a competitive bid process where possible. A supplier to Ra Medical is generally free to sell its products or services to any other party, including Ra Medical competitors. In some cases where the products or services have been designed, fabricated, or developed to Ra Medical's specifications, the agreement between the parties may contain restrictions on sales.

Ra Medical prohibits the violation of laws in countries where it does business. Ra Medical expects procurement personnel and other employees who transact business with its suppliers, vendors, or subcontractors to communicate to suppliers Ra Medical's requirement to comply with all applicable laws.

Ra Medical's procurement and other employees who conduct business with suppliers, vendors, and subcontractors shall ensure that all contracts with suppliers, vendors, and

subcontractors require compliance with applicable local, state, provincial, and federal laws, including those related to employment and wages, eradication of human trafficking and slavery, the environment, and anti-corruption, wherever they are engaged in business. Violation of these requirements may lead to immediate termination of a supplier or vendor contract.

XVI. INSIDER TRADING

The purpose of Ra Medical's insider trading policy is to establish guidelines to ensure that all employees and directors comply with laws prohibiting insider trading. No employee or director in possession of material, non-public information may trade Ra Medical's securities (or advise others to trade) from the time they obtain such information until after adequate public disclosure of the information has been made. Employees and directors who knowingly trade Ra Medical securities while in possession of material, non-public information or who tip information to others may be subject to appropriate disciplinary and/or enforcement action, which may include termination of employment, consistent with applicable laws. Insider trading is also a crime.

Employees and directors also may not trade in stocks of other companies about which they learn material, non-public information through the course of their employment or service with Ra Medical.

Any questions as to whether information is material or has been adequately disclosed should be directed to the Ethics Officer. Additional information regarding insider trading can be found in Ra Medical's Insider Trading Policy, which is available on Ra Medical's internal website or upon written request to Ra Medical's Chief Financial Officer, Head of Human Resources (including the Company's outside Head of Human Resources, if applicable), or General Counsel (if applicable).

XVII. EXPORT CONTROLS

Ra Medical requires compliance with laws and regulations governing export controls in both the United States and in the countries where Ra Medical conducts its business. ("Sweat the details.") A number of countries maintain controls on the destinations to which products may be exported. Some of the strictest export controls are maintained by the United States against countries that the U.S. government considers unfriendly or as supporting international terrorism. The U.S. regulations are complex and apply both to exports from the United States and to exports of products from other countries, when those products contain U.S.-origin components or technology. In some circumstances, an oral presentation containing technical data made to foreign nationals in the United States may constitute an export subject to control. Any questions about export control laws and regulations should be directed to the Ethics Officer.

XVIII. ANTITRUST AND COMPETITION LAWS

Antitrust Competition laws are designed to create a level playing field in the marketplace and to promote fair competition. These laws generally prohibit (i) agreements with competitors regarding pricing, certain boycotts of customers or suppliers, limiting production or sales, or market, geographic, or customer allocation, (ii) certain agreements regarding tying or bunching, and (iii) attempts to create monopolies or otherwise creating barriers to entry in the market,

including in some circumstances selling product below cost. Ra Medical employees and directors must not exchange non-public Ra Medical information with competitors. These laws vary by country and can be complex. Ra Medical employees and directors having roles that may implicate them with antitrust laws are responsible for knowing the laws that apply to their Ra Medical business activities. It is important for employees and directors to consult with Ra Medical's Chief Ethics Officer if they have any questions.

XIX. GIFTS AND ENTERTAINMENT

Business gifts and entertainment are designed to build goodwill and sound working relationships among business partners. A problem may arise if:

- The receipt by one of our employees of a gift or entertainment would compromise, or could reasonably be viewed as compromising, that person's ability to make objective and fair business decisions on behalf of Ra Medical; or
- The offering by one of our employees of a gift or entertainment would appear to be an attempt to obtain business through improper means or to gain any special advantage in our business relationships, or could reasonably be viewed as such an attempt.

Employees must use good judgment and ensure there is no violation of these principles. Any questions about whether any gifts or proposed gifts are appropriate should be directed to Ra Medical's Chief Ethics Officer.

XX. GOVERNMENT BUSINESS

Employees should understand that special requirements apply when contracting with any governmental body (including national, state, provincial, municipal, or other similar governmental divisions on local jurisdictions). Because government officials are obligated to follow specific codes of conduct and laws, special care must be taken in government procurement. Some key requirements for doing business with government include:

- Accurately representing which Ra Medical products are covered by government contracts;
- Not improperly soliciting or obtaining confidential information, such as sealed competitors' bids, from government officials prior to the award of a contract; and
- Hiring present and former government personnel may only occur in compliance with applicable laws and regulations (as well as consulting Ra Medical's Chief Ethics Officer).

When dealing with public officials, employees and directors must avoid any activity that is or appears illegal or unethical. Promising, offering or giving of favors, gratuities or gifts, including meals, entertainment, transportation, and lodging, to government officials in the various branches of U.S. government, as well as state and local governments, is restricted by law. Employees and directors must obtain pre-approval from Ra Medical's Chief Ethics Officer

before providing anything of value to a U.S. government official or employee. The foregoing does not apply to lawful personal political contributions.

In addition, the U.S. Foreign Corrupt Practices Act, as well as applicable laws of other countries, prohibit giving anything of value, directly or indirectly, to any (i) officer or employee of a government or any department, agency, or instrumentality thereof, (ii) political party or official thereof, (iii) candidate for political office, or (iv) officer or employee of a public international organization (collectively, “**Official**”) in order to obtain or retain business. Illegal payments to Officials are strictly prohibited. Additional information regarding the Foreign Corrupt Practices Act and similar anti-corruption laws can be found in Ra Medical’s Foreign Corrupt Practices Act Compliance Policy, which is available on Ra Medical’s internal website or upon written request to Ra Medical’s Chief Ethics Officer.

XXI. POLITICAL CONTRIBUTION

It is Ra Medical’s policy to comply fully with all local, state, federal, foreign and other applicable laws, rules and regulations regarding political contributions. Ra Medical’s funds or assets must not be used for, or be contributed to, political campaigns or political practices under any circumstances without the prior written approval of Ra Medical’s Chief Ethics Officer and, if required, Ra Medical’s Board of Directors.

XXII. PROTECTION AND PROPER USE OF RA MEDICAL ASSETS

Theft, carelessness, and waste have a direct impact on Ra Medical’s profitability. Employees and directors should protect Ra Medical’s assets and ensure their efficient use. All Ra Medical assets should be used for legitimate business purposes.

Ra Medical assets include intellectual property such as patents, trademarks, copyrights, business and marketing plans, engineering and manufacturing ideas, designs, and any unpublished financial data and reports. Unauthorized use or distribution of this information is a violation of Ra Medical policy.

XXIII. CONFIDENTIALITY

Employees and directors should maintain the confidentiality of information entrusted to them by Ra Medical or its affiliates, customers, partners, distributors and suppliers. “Confidential Information” means information (including any and all combinations of individual items of information) that Ra Medical has or will develop, acquire, create, compile, discover or own, that has value in or to Ra Medical’s business which is not generally known and which Ra Medical wishes to maintain as confidential. Confidential Information includes both information disclosed by Ra Medical to employees or directors, and information developed or learned by employees or directors during the course of their relationship with Ra Medical. Confidential Information also includes all information of which the unauthorized disclosure could be detrimental to the interests of Ra Medical, whether or not such information is identified as Confidential Information. By example, and without limitation, Confidential Information includes any and all non-public information that relates to the actual or anticipated business and/or products, research or development of Ra Medical, or to Ra Medical’s technical data, trade secrets, or know-how, including, but not limited to, research, product plans, or other information regarding Ra

Medical's products or services and markets therefor, customer lists and customers, software, developments, inventions, discoveries, ideas, processes, formulas, technology, designs, drawings, engineering, hardware configuration information, marketing, finances, and other business information disclosed by Ra Medical either directly or indirectly in writing, orally or by drawings or inspection of premises, parts, equipment, or other Ra Medical property. Notwithstanding the foregoing, Confidential Information shall not include any such information which an employee or director can establish (i) was publicly known or made generally available prior to the time of disclosure by the Company to the employee or director; (ii) becomes publicly known or made generally available after disclosure by the Company to the employee or director through no wrongful action or omission by the employee or director; or (iii) is in the employee's or director's rightful possession, without confidentiality obligations, at the time of disclosure by the Company as shown by the employee's or director's then-contemporaneous written records; provided that any combination of individual items of information shall not be deemed to be within any of the foregoing exceptions merely because one or more of the individual items are within such exception, unless the combination as a whole is within such exception. Nothing in this section is intended to limit employees' rights to discuss the terms, wages, and working conditions of their employment, as protected by applicable law.

Any questions about whether information is confidential should be directed to Ra Medical's Chief Financial Officer or Chief Ethics Officer.

Notwithstanding the foregoing, nothing in this policy or any other Company policy limits or prohibits an employee or director from engaging for a lawful purpose in any "Protected Activity." "Protected Activity" means filing a charge, complaint, or report, or otherwise communicating with or participating in any investigation or proceeding that may be conducted by state, federal, local, or other governmental agency, including the Securities and Exchange Commission, the Occupational Safety and Health Administration, the Equal Employment Opportunity Commission, and the National Labor Relations Board ("Government Agencies"). In connection with such Protected Activity, employees and directors are permitted to disclose documents or other information as permitted by law, and without giving notice to, or receiving authorization from, the Company. In making any such disclosures or communications, employees and directors must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant Government Agencies. "Protected Activity" does not include the disclosure of any Company attorney-client privileged communications or attorney work product; any such disclosure, without the Company's written consent, violates Company policy. In addition, pursuant to the Defend Trade Secrets Act of 2016, employees and directors are notified that an individual will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that (i) is made in confidence to a federal, state, or local government official (directly or indirectly) or to an attorney *solely* for the purpose of reporting or investigating a suspected violation of law, or (ii) is made in a complaint or other document filed in a lawsuit or other proceeding, if (and only if) such filing is made under seal. In addition, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to the individual's attorney and use the trade secret information in the court proceeding, if the individual files any document containing the trade secret under seal and does not disclose the trade secret, except pursuant to court order.

XXIV. RECORDS ON LEGAL HOLD

A legal hold suspends all document destruction procedures in order to preserve appropriate records under special circumstances, such as threatened or actual litigation or government investigations. Ra Medical's Chief Financial Officer or Chief Ethics Officer determines and identifies what types of Ra Medical records or documents are required to be placed under a legal hold and will notify employees if a legal hold is placed on records for which they are responsible. Employees and directors must not destroy, alter, or modify records or supporting documents that have been placed under a legal hold under any circumstances. A legal hold remains effective until it is officially released in writing by Ra Medical's Chief Financial Officer or Chief Ethics Officer. If an employee or director is unsure whether a document has been placed under a legal hold, such employee or director should preserve and protect that document while the Chief Financial Officer or Chief Ethics Officer is contacted.

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ACKNOWLEDGEMENT OF CODE OF ETHICS AND CONDUCT FOR EMPLOYEES AND DIRECTORS

I have received and read this Ra Medical Inc. Code of Ethics and Conduct. I understand the standards and policies contained in the Code, and I understand that there may be additional policies or laws specific to my position with Ra Medical. Unless otherwise prohibited by applicable law, I agree to comply with the Code.

If I have questions concerning the meaning or application of the Code, any Ra Medical policies or procedures, or the legal and regulatory requirements applicable to my position with Ra Medical, I know that I can consult with Ra Medical's Chief Financial Officer or Chief Ethics Officer.

Print Name

Signature

Date

Please sign and return this form to the Human Resources Department.