

# **PULMONX CORPORATION**

## **CODE OF BUSINESS CONDUCT AND ETHICS**

**APPROVED BY THE BOARD OF DIRECTORS  
SEPTEMBER 15, 2020; AMENDED SEPTEMBER 1, 2021**

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Pulmonx is committed to maintaining the highest standards of business conduct and ethics. We expect every employee, officer and director to not only read and understand the business practices and principles described below, but to also apply good judgment and the highest personal ethical standards in making business decisions. Please remember you should consider not only your own conduct, but also that of your family members, significant others and other people in your household.

Do not hesitate to ask questions about whether certain conduct may violate the code, to voice concerns or to clarify gray areas. You should also be alert to possible violations and report them without fear of retaliation. See Section 15 below for instructions on how to ask questions or report violations.

Any employee who violates the standards in this code may be subject to disciplinary action, that, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to termination of employment and, in appropriate cases, civil legal action or referral for criminal prosecution.

While this code covers a wide range of business conduct, it is not the only document that addresses the conduct of Pulmonx employees, officers and directors. For instance, this code references separate more detailed policies relating to Anti-Corruption and Insider Trading. Also, Pulmonx's Employee Guide includes policies relating to, among other things, harassment and discrimination. Finally, Pulmonx employees remain subject to the terms of the Proprietary Information and Inventions Agreement that they signed in connection with their employment. If you have any questions about whether your behavior or any behavior you observe is appropriate, it is your responsibility to ask.

### **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. Pulmonx's integrity and reputation depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity and sound judgment is the foundation of corporate integrity.

### **2. LEGAL COMPLIANCE**

Obeying the law is the foundation of this code. Our success depends upon each employee 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. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as Pulmonx, to civil and/or criminal penalties.

### **3. INSIDER TRADING**

Employees, officers and directors who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes. All non-public information about Pulmonx or about other companies 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 illegal. Please refer to Pulmonx's Insider Trading Policy for more detailed information.

#### **4. INTERNATIONAL BUSINESS LAWS**

Our employees, officers and directors 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. The fact that, in some countries, certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. Please also refer to Pulmonx's Anti-Corruption Policy.

#### **5. ANTITRUST**

Antitrust laws are designed to protect the competitive process and impose severe penalties for certain types of violations, including criminal penalties. 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. 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.

#### **6. CONFLICTS OF INTEREST**

We expect our employees, officers and directors to be free from influences that conflict with the best interests of Pulmonx or might deprive Pulmonx of their undivided loyalty in business dealings. Even just the appearance of a conflict of interest can be damaging and should be avoided. Whether or not a conflict of interest exists can be unclear. The following are some (but not all) situations that may involve problematic conflicts of interests: (a) employment by, consulting for, or service on the board of a competitor, customer or supplier; (b) owning a significant financial interest in an entity that does business, seeks to do business or competes with us; (c) soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us; (d) certain types of "moonlighting"; and (e) loans to, or guarantees of obligations of, employees, officers or directors or their family members by Pulmonx. If you have any concerns about how to comply with this policy, you should discuss with the General Counsel or, if the Company does not have a General Counsel, the Company's Chief Financial Officer.

#### **7. CORPORATE OPPORTUNITIES**

You may not take personal advantage of opportunities for Pulmonx 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. 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. If you have any concerns about how to comply with this policy, you should discuss with the General Counsel or, if the Company does not have a General Counsel, the Company's Chief Financial Officer.

#### **8. FINANCIAL INTEGRITY**

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 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. We also rely upon our accounting and other business and corporate records in preparing publicly-filed reports. 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 contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is complete, accurate and transparent.

## **9. FAIR DEALING**

Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Statements regarding Pulmonx's services must not be untrue, misleading, deceptive or fraudulent. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from employees of other companies is prohibited. 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. 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.

## **10. GIFTS AND ENTERTAINMENT**

Gifts and entertainment relating to government officials is addressed in Pulmonx's Anti-Corruption Policy. Business gifts and entertainment with counterparts in the private sector are acceptable if (a) intended to create goodwill and sound working relationships, and not to gain improper advantage with customers; (b) consistent with common and acceptable business practice and not extravagant or inappropriate; and (c) such gifts and entertainment would not violate other Company policies, including the General Compliance Principles Policy. If you have any concerns about whether any gifts or entertainment offered or received by you are appropriate under this code, you are expected to request permission from your manager or from the General Counsel or, if the Company does not have a General Counsel, the Company's Chief Financial Officer.

## **11. COMPANY ASSETS**

All employees, officers and directors 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, buildings and products, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use our corporate name, any brand name or trademark owned or associated with Pulmonx or any letterhead stationery for any personal purpose.

## **12. CONFIDENTIALITY**

As an employee, officer or director of Pulmonx, you may learn information about Pulmonx or other companies that is confidential and proprietary. You must take care to keep this information confidential. Materials that contain confidential information should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and "quasi-public" areas within Pulmonx, such as cafeterias. All Pulmonx emails, voicemails and other communications are presumed confidential and should not be forwarded outside of Pulmonx, except where required for legitimate business purposes. Pulmonx employees are bound by the terms of the

Proprietary Information and Inventions Agreement or similar terms that they agree to in connection with their employment.

### **13. MEDIA/PUBLIC DISCUSSIONS**

It is our policy to disclose material information concerning Pulmonx 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 Chief Financial Officer or the Chief Executive Officer. Please also refer to Pulmonx's Corporate Disclosure Policy.

### **14. WAIVERS**

Any waiver of this Code for executive officers or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of any stock exchange on which our capital stock is listed and our Corporate Governance Guidelines, a committee of the Board of Directors and will be disclosed to stockholders as required by applicable laws, rules and regulations.

### **15. QUESTIONS AND REPORTING POTENTIAL VIOLATIONS**

Your most immediate resource for any matter related to this code is your supervisor, who 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 either with the Chief Executive Officer, the Chief Financial Officer or the General Counsel.

If you are aware of a suspected or actual violation of this code, you have a responsibility to promptly report it and we will take prompt disciplinary action against any employee, officer or director who retaliates against you. The General Counsel or, if the Company does not have a General Counsel, the Company's Chief Financial Officer will investigate all reported possible code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances.

A hotline, which you may reach at 833-976-2024, is also available to those who wish to report violations of this code, including concerns regarding Pulmonx auditing and accounting matters. You may call the number anonymously if you prefer, as it is not equipped with caller identification, although in that case the General Counsel or Chief Financial Officer, as applicable, will be unable to obtain follow-up details from you that may be necessary to investigate the matter. Whether you identify yourself or remain anonymous, your contact with the anonymous reporting service will be kept strictly confidential to the extent reasonably possible within the objectives of this code.

If any investigation indicates that a violation of this code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee, officer or director is responsible for a code violation, he or she will be subject to disciplinary action up to, and including, termination and, in appropriate cases, civil action or referral for criminal prosecution.