

Message from CEO

All of us at Axonics recognize the important role we play in healthcare. Our employees all across the world are aware that our customers depend on them to offer safe and effective solutions to challenging healthcare problems. Our products and services help our customers give the best possible care to patients.

Axonics has been successful because of its dedication to doing the right thing and providing high-quality products. Axonics has the highest ethical standards, and our business is built on the idea that doing the right thing should be part of everything we do. Our patients depend on us, as do our coworkers, our stockholders, and the community. For this reason, we can never forget that there is no right way to do a wrong thing.

The right thing to do isn't always clear or obvious, and that's why Axonics has set up tools to help all of us figure out how to do our jobs well. To understand what is required of each of us as representatives of the company, we should read this Code of Conduct, which describes the principles and values of Axonics. We must also read and understand our other policies and procedures, and work to uphold the ethical principles outlined in all of these written standards. Together, we can achieve strong business results and make positive contributions by working together and preserving our dedication to ethical conduct.

I encourage you to speak up, raise concerns, and always do the right thing. We can all be proud of working for an organization committed to following the highest ethical and business standards.

Doing What is Right

Making Ethical Decisions

The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically. The integrity and reputation of the Company depend on the honesty, fairness, and integrity brought to the job by each person associated with the Company. Each director, officer, and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, suppliers, partners, service providers, competitors, employees, and anyone else with whom he or she has a contact in the course of performing his or her job. Acting ethically and obeying the law, both in letter and in spirit, are fundamental principles of the Code. The Company's success depends upon each employee operating within legal guidelines and cooperating with local, national, and international authorities.

Speaking Up

We encourage and expect everyone at Axonics to speak up by asking questions, raising concerns, seeking guidance, and reporting actual or suspected violations of laws, our Code of Conduct, our policies, or our high ethical standards.

It is critical that we speak up when we see something that conflicts with our values and our Code. To that end, employees are encouraged to ask questions, raise concerns or seek guidance in the following ways:

- Ethics hotline
- Contacting your manager or neutral and uninvolved manager
- Contacting HR or the Legal Department

Compliance with Laws

The Company expects employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. While the Company does not expect you to memorize every detail of these laws, rules, and regulations, the Company wants 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 Legal Department.

Reporting Violations and Whistleblower Laws

Every employee must report suspected or actual violations of laws, government rules and regulations, the Code or other Company policies. If an employee has reason to believe that there exists questionable or illicit conduct, including conduct related to the reporting of the Company's financial performance, the Company's accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters, the employee should immediately report those facts to his or her supervisor or the Company's Legal Department or by the procedures set forth below. As noted below, supervisors are required to report to the Legal Department any time they receive a report of a concern about the Company's compliance with laws, the Code or other Company policy, any notice of any suspected wrong-doing by any Company employee, officer or director, any complaint or concern about the Company's accounting, internal accounting controls, or auditing matters, or any concerns regarding any questionable accounting or auditing matters.

In addition, the California Office of the Attorney General maintains a whistleblower hotline at (800) 952-5225 to receive calls from persons who have information regarding possible violations of state or federal statutes, rules, or regulations, or violations of fiduciary responsibility by a corporation or limited liability company to its shareholders, investors, or employees.

The Company has also established a procedure under which complaints may be reported anonymously. Employees may anonymously report these concerns to either or both a toll-free help line at 833-589-0399 and on the web at <https://axonics.ethicspoint.com>.

Employees should make every effort to report their concerns using one or more of the methods specified above. The complaint procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this policy or the Code. Anonymous reports should be factual, instead of speculative or conclusory, and should contain as much specific information as possible to allow the Legal Department and other persons investigating the report to adequately assess the nature, extent and urgency of the investigation.

Zero Tolerance for Retaliation

Axonics does not tolerate any form of retaliation. This applies to anyone who reports an actual or suspected violation of Company policy or cooperates in investigations. Axonics wants all employees to feel comfortable asking questions, raising concerns, or seeking guidance without fear of retaliation. Any Axonics employee who engages in retaliation will be subject to disciplinary action, up to and including termination of employment. If you believe someone has retaliated against you, contact Human Resources or the Legal Department.

What does retaliation look like? (Examples)

- Terminating, demoting, or suspending an employee
- Denying benefits
- Threatening or belittling an employee
- Passing over an employee for a promotion, raise, or bonus
- Requiring an employee to meet more burdensome and unrealistic expectations
- Providing negative performance reviews that are false
- Removing an employee from accounts and projects without justification
- Reducing an employee's hours

Applying our Code

Everyone at Axonics, from directors to officers and employees, must follow our Code of Conduct as it applies equally to everyone. This is a condition of employment at Axonics.

At work, we must always make choices in line with our values and the Code. Among other things, this means:

- Meeting our standards, as our Code sets out
- Never compromising our values to achieve our objectives
- Learning and following our Code, policies and procedures, and all laws and regulations applicable to our Company.
- Speaking up when we see or suspect someone is not following the Code and asking for help when it is not clear what we should do.

Our people

Fostering a Respectful Workplace

Everyone deserves to work in a supportive, inclusive, and safe environment. We treat everyone with dignity and respect. Respecting others is an important factor for our success. We do our best work

when we feel safe and secure, knowing that our ideas and talents will be recognized and respected. That's why we never tolerate discrimination, harassment, retaliation, bullying, or violent conduct at work.

Upholding Labor and Employment Laws

We respect everyone, and that starts here in our business. We think that following the laws when it comes to labor and employment issues is not only the right thing to do, but it will also help our business grow. We must comply with labor and employment laws to protect our associates and our business. We show respect for our people by creating a safe and fair place to work. When people are treated fairly and with respect, they will be more fulfilled, motivated, and do better work.

Following labor and employment laws is not only the right thing to do, but it also helps Axonics grow. Complying with all applicable laws protects both our employees and our business.

Axonics is committed to paying every employee properly and according to the law. Notices are posted in all work facilities about wages and hours, including the right to be paid for all hours worked. We also post notices about what work qualifies as overtime and other wage and hour information. If you have any questions related to wages or hours, please contact Human Resources.

Additionally, Axonics' policy is to provide employment opportunities without regard to race, religion, color, national origin, sex, age, ancestry, citizenship, veteran status, marital status, sexual orientation, disability, or any other reason prohibited by law. Decisions as to hiring, promotion, and other aspects of the employment relationship should be based solely on job-related qualifications.

Creating a Positive Working Environment

As Axonics works to achieve business success while operating ethically, our employees are our greatest strength. Knowing that each one of us contributes to the success and reputation of Axonics, the company is committed to providing a positive working environment whereby we, as employees, feel comfortable and inspired.

We all have the right to work in an environment free from any form of harassment, discrimination, intimidation, or retaliation. Axonics will not tolerate any such behavior – whether it be from an employee or a third party with which we do business. Every employee is expected to treat those that they encounter while performing their job with respect and dignity.

It is up to each one of us to support and maintain a positive working environment at Axonics, and the Company asks that we each do our part to foster the kind of productivity that is inherent when people enjoy their jobs.

Preventing Harassment and Discrimination

Harassment or discrimination, whether by an Axonics employee, by an independent contractor, or by representatives of customers, vendors, agents, or any other third parties who interact with Axonics' employees is not permitted.

Harassment or discrimination is any unwelcome conduct, based on a protected characteristic, or otherwise, that interferes with work performance or creates an intimidating, hostile, or abusive working environment.

Protected characteristics include:

- Race
- Religion
- Color
- National Origin
- Ancestry
- Social class
- Physical disability
- Mental disability
- Medical condition
- Age
- Military and veteran status
- Genetic information
- Marital status (including registered domestic partnership status)
- Sex (including pregnancy, childbirth, lactation, and related medical conditions)
- Gender
- Gender identity
- Gender expression
- Sexual orientation
- any other characteristic protected under federal, state, or local laws

Sexual harassment includes a situation in which accepting sexual advances or requests for sexual favors are made conditions of employment or the basis of employment decisions, either explicitly or implicitly. Sexual harassment can occur between people of the same or opposite gender, can occur regardless of the gender of the harasser, and includes any harassing conduct of a sexual nature, even if sexual desire did not motivate the conduct.

Examples of Sexual Harassment include (illustrative only; not an exhaustive list):

- Sexual innuendos or suggestive comments

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- Offensive sexual language
- Unwanted sexual advances or propositions
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Making sexually-related derogatory comments or sexually explicit jokes
- Sexual commentary about an individual's body
- Sexually degrading words to describe an individual
- Suggestive or obscene letters, notes, texts, Skype, or other forms of instant messages or invitations
- Inappropriate physical contact of a sexual nature
- Visual conduct such as leering, making sexual gestures, or displaying of sexually-oriented objects or pictures

Safe and Healthy Workplace

Everyone deserves to be safe and healthy in the workplace. It is important to make sure our operations exceed applicable health and safety laws. Therefore, it is imperative that all employees do the following:

- Follow Axonics' health and safety policies and procedures
- Report unhealthy or unsafe conditions or behaviors, which include workplace hazards, broken or missing equipment, or the presence of weapons on Axonics' property to a supervisor, HR, or the Legal Department.
- Know what to do in case of injury or other workplace emergencies.

We Maintain Accurate Records

Accurate recordkeeping and reporting help us meet our legal and regulatory requirements. Maintaining financial integrity also reflects positively on our reputation and credibility. Each of us – at every level of our Company – has a responsibility for ensuring the accuracy of all Company business and financial records.

From resumes, timesheets, and benefit claim forms to expense reports, quality assurance records, budget forecasts, and regulatory filings, we all handle Company "records." Be sure to follow all internal processes, policies, and generally accepted accounting principles so that our records accurately reflect all transactions. Be honest, accurate, and complete in what you record.

Be honest with regulators. If your job requires that you disclose information to the government or regulatory authorities, make sure the information you provide is full, fair, accurate, timely, and understandable. Manage records properly. Know and follow the policies that relate to the maintenance, storage, and disposal of records. Never destroy or dispose of information that might be needed for an investigation, an audit, or a legal proceeding. If you receive a legal hold notice, follow the guidelines in the notification. And, if you are not sure about what is required, check Legal Counsel and our document retention policy

We are a publicly traded company that conducts business in many countries. In all of our dealings, we must keep accurate books and records that maintain the integrity of our financial reporting, support our internal decision-making, and strengthen our reputation with stakeholders. Laws require us to be honest and accurate in our financial records. And, many people rely on us to report financial information truthfully, completely, and in a timely fashion, such as government regulatory agencies, rating agencies, and institutional and individual investors. Inaccurate financial reporting could undermine shareholder confidence, impact our reputation, and subject the Company to fines and penalties.

Our Customers and Marketplace

What We Believe

Strong, long-term relationships with healthcare professionals (“HCPs”), healthcare organizations (“HCOs”), and government officials (“GOs”) help us better understand our customers and their patients’ needs. Through collaboration, we will continue to develop high-quality products and be able to teach people about their safe and effective use. These relationships must be based on the highest ethical standards.

Why it Matters

Law and industry codes around the globe establish high standards that govern our interactions with HCPs, HCOs, and GOs. If we cannot protect these types of relationships, build trust, and sustain them over time, our reputation will be damaged, and our business will suffer. If we make mistakes, the consequences are severe.

Dealing Ethically with HCPs, HCOs, and Government Officials

Axonics has many interactions with government officials and employees around the world. In many countries, interactions with government officials and employees are governed by very strict rules. Such interactions must comply with these rules and be conducted with integrity. You should not do anything that could be viewed as an attempt to improperly influence the decisions of a government, its officials, or its employees. Never offer anything of value that could be seen as a bribe or kickback. Remember that a bribe is not limited to the exchange of money but could also include the promise or giving of a gift, entertainment, travel, or a favor. If a government official or employee requests or demands any such benefit, report this immediately to any of the resources listed at the end of the Code.

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quality products and teach people about their safe and effective use. These relationships must be based on the highest ethical standards.

Law and industry codes around the globe set high standards that govern our interactions with HCPs, HCOs, and GOs. These relationships must always be grounded in a legitimate business need and never be used to secure an improper business advantage. If we cannot develop these types of relationships, build trust, and sustain them over time, our reputation will be damaged and our business will suffer. If we make mistakes, the consequences are severe.

Axonics does not accept, offer, or approve bribes of any kind. A bribe or “kickback” is anything of value meant to gain an improper business advantage. It also applies if we attempt to get favorable treatment from a government official. We must avoid even the appearance of trying to bribe someone. Axonics follows anti-corruption laws in many countries, including U.S. Foreign Corrupt Practices Act (FCPA), U.S. Anti-Kickback Statute, and the U.K. Bribery Act.

Giving or accepting gifts or other items can create the perception of a conflict of interest or exposure under anti-bribery and corruption laws. Essential and specific rules apply to gifts, entertainment, educational items, and other business courtesies to HCPs, HCOs, and GOs.

Laws and industry codes in many countries require that we report HCP and HCO payments (or certain other transfers of value) to government organizations and/or the public (for example, the U.S. “Sunshine Act”). To do this, we must keep accurate records of all payments.

Ensuring Product Safety and Quality

The safety of patients and users of our products is a top priority. We think about the patient and healthcare professional during every step of development and production. We all need to make sure that Axonics’ products and technologies meet all safety and quality standards.

To help successful diagnosis and treatment, Axonics’ products must be safe and effective for their intended use. Our customers and patients are at the heart of everything we do, and they depend on the quality and safety of our products, so we never cut corners.

Axonics has built its reputation on developing and manufacturing quality products. Our commitment to quality is the right thing to do for patients and for our Company; and by focusing on quality and continuous improvement in our manufacturing operations, we continue to earn the trust of physicians and patients worldwide.

By engaging qualified and reputable suppliers and following the most stringent guidelines applicable to our global manufacturing operations, we ensure that our products meet the high standards that physicians and patients have come to expect from us.

Axonics further strives to meet these high standards by rigorously challenging the integrity of the products we manufacture so that only products of the highest quality reach the market. We continue to evaluate the performance of our products throughout their shelf-life, which can be several years, to maintain their quality and reliability.

We all share a responsibility to maintain our high-quality standards for manufacturing by:

- Making patient safety a paramount focus of our manufacturing efforts;
- Following all applicable laws, regulations, and Company policies and procedures;
- Engaging only suppliers and other third parties who support Axonics' commitment to high-quality standards;
- Never sacrificing quality to meet a deadline or target and
- Raising any quality questions or concerns through appropriate channels.

Dedicated to Quality

Axonics is committed to quality. Axonics expects you to take responsibility for quality. This means you should:

- Take pride in your work and pay careful attention to detail, regardless of the task.
- Follow Company policies, procedures, and work instructions every single time.
- Complete all required training promptly.
- Take appropriate action whenever you are concerned about quality.
- Immediately report all potential product complaints.
- Immediately report any situation that could result in a quality or regulatory issue.
- Look for ways to improve quality within your job and the Company.
- Above all, keep quality as your #1 priority.

Our Company and Shareholders

Safeguarding Confidential Information and IP

We take care of everything we own so we can continue to innovate and improve our products. This is one way we can help our customers and meet the needs of patients around the world.

Our Company's assets are everything we own. They are the result of the investment, innovation, and hard work of our associates, past and present. They are a vital part of efforts to make sure Axonics continues to profit and maintain a competitive advantage.

Our intellectual property and confidential information are irreplaceable assets. We must secure and protect the use of these valuable assets. Intellectual property and confidential information include copyrights, patents, trademarks, product and package designs, brand names and logos, research and development, inventions and trade secrets, business plans, product formulas, marketing strategies and new product launches, financial information such as pricing, proposals and product costs, and operational information such as major management changes and plans for mergers and acquisitions.

At all times, employees should take precautions to protect our intellectual property and confidential business information. Employees should avoid talking about or sharing information about these things in public places, such as airports and restaurants. Employees must only share Intellectual Property and confidential information only with those who have both the authorization to access it and a

need to know the information to do their jobs. If you are not sure whether information can be shared or how to share it, ask the Legal department.

Any suspected theft of intellectual property or unauthorized disclosure of, or access to, Company information should be immediately reported to one's manager, who will decide on further escalation to the Legal Department.

Remember: your duty regarding Intellectual Property and confidential information lasts beyond your employment. Your commitment to protect this information applies to the work you did before you came to the Company, and it applies when you leave.

Safeguarding Our Reputation

We all have to protect our reputation by being positive and truthful when talking about our Company. Since our founding, we have built and maintained our reputation and trustworthiness. If we don't use one voice and share one message, it may hurt our Company.

At Axonics, employees are part of a community dedicated to groundbreaking technology that transforms lives. Integrity is fundamental to Axonics. How we act and speak influences how consumers feel about our products and how shareholders perceive us as an investment. It is up to all of us to protect our reputation.

Integrity is a promise to do what is right. This means acting honestly and treating each other and our customers, patients, and suppliers fairly and with dignity. By acting with integrity, we reflect positively the values and reputation of the Company and the countries where we operate.

Integrity is always in the highest order as we strive for both compliance and customer satisfaction, regardless of role or function. Failing to comply with the Code of Conduct, our policies and applicable laws places our trusted relationships, our business, and our reputation at risk.

The Code is meant to serve as a foundation for our existing policies and rules. Use the Code to:

- Help ensure that integrity and ethics in all business relationships are maintained while simultaneously striving for high customer satisfaction, and
- Encourage ethical discussions and improve how we each deal with the ethical dilemmas and gray areas that are encountered in everyday work

We all must follow the law, and act with integrity and honesty in all matters. We must be accountable for our actions. Acting with integrity is about more than our Company's image and reputation, or avoiding legal issues. It is about sustaining a place where we are all proud to work.

Avoiding Conflicts of Interest

We are loyal and place the Company's interests over our personal interests. We avoid conflicts, or the appearance of conflicts, between our personal interests and the Company's interests. How we act when we do business affects our reputation and the trust we have earned with stakeholders. Conflicts of

interest can affect the decisions we make for Axonics or create the appearance of unfairness or bias in our jobs, which could hurt the trust we have built.

The Company respects the rights of its employees to manage their personal affairs and investments and does not wish to impinge on their personal lives. At the same time, employees should avoid conflicts of interest that occur when their 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. The Company expects its employees to be free from influences that conflict with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings. Even the appearance of a conflict of interest where none 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. The Company abides by the securities laws that govern conflicts of interest by its executive officers and directors. As a result, the actions or relationships that meet the requirement for disclosure in the Company's periodic filings with the SEC pursuant to Item 404 of Regulation S-K, referred to as related person transactions, must be approved or ratified, as applicable, by the Company's Board of Directors (the "Board") or as required by applicable laws and regulations and consistent with the Company's policies.