

Purpose

At Intuitive Surgical, we are committed to conducting our business in compliance with all applicable laws, regulations, and policies governing international trade. This Global Trade Compliance (GTC) Policy outlines our policy and expectation to adhere to these standards, minimize legal risks, fulfill applicable Trade Compliance requirements, and promote transparent and responsible trade activities.

Scope

This policy applies to and is mandatory for all employees, contractors, subsidiaries, and third-party partners involved in global trade activities of Intuitive Surgical.

Policy

Definitions	Highlighted terms are defined in 1122500, <i>Global Trade Compliance Glossary</i> .
Overview	By following this policy, we ensure that our global trade activities are conducted ethically, legally, and responsibly, thereby protecting our business interests and reputation. Failure to comply with this policy can result in financial and other penalties for Intuitive Surgical or the individuals involved.
Requirements	<p>The requirements related to this policy are identified below.</p> <p>1.0 Policy and Expectation: It is our policy and expectation that Intuitive Surgical business be conducted within compliance with all applicable import and export regulations. This includes, but is not limited to:</p> <ol style="list-style-type: none"> 1.1 submitting accurate and compliant import and/or export declarations in accordance with Custom and Export agencies regulations, 1.2 implementing and maintaining documented procedures, instructions, and controls to manage external agent compliance, 1.3 maintaining records of import and export transactions and associated trade documentation. 1.4 adhering to all applicable sanctions and embargoes imposed by the United Nations, United States, European Union, Switzerland, and other relevant authorities, 1.5 conducting business with eligible end users and not those listed on any applicable government restricted, denied, or blocked part lists, 1.6 verifying the end-use and end-user of exported items to prevent unauthorized use or diversion to prohibited activities or destinations, 1.7 ensuring compliance with export / deemed export control regulations, including the Export Administration Regulations (EAR), and similar legislation applicable in the United States, European Union, Switzerland, and other relevant jurisdictions, 1.8 obtaining export licenses or authorizations prior to shipment, including transfers of controlled technology to foreign entities and nationals.

Confidential and proprietary. Prior to use, use ACCS to verify that this is the current revision.

Printed on: July 2, 2025

CONFIDENTIAL AND PROPRIETARY – Intuitive Surgical, Inc.

Prior to use, use ACCS to verify that this is the current revision

Page 1 of 2

ECO: C434906

Template: 1140743 Rev A

2.0 Continuous improvement

2.1 Intuitive Surgical is committed to continuous improvement in trade and customs compliance. This involves staying updated with changes in laws and regulations, adopting best practices, cooperation with competent authorities, customs agents and other parties involved in the trade and customs compliance related to the Intuitive Surgical products, and leveraging technology to enhance compliance processes.

3.0 Cooperation with authorities

3.1 Intuitive Surgical is committed to cooperating fully, timely, and efficiently with local authorities having a role in trade and customs compliance and with audits initiated by the authorities.

4.0 Employee engagement

4.1 Employees are encouraged to report any suspicious activities or breaches of this policy without fear of retaliation.

The department and role that owns this document is **Global Trade Compliance**. For further guidance or clarification on this policy, please contact your GTC team at Intuitivetrade compliance@intusurg.com.

Finalized 05/02/2025

Revision History: Rev A