

As part of our corporate mission to provide innovative healthcare solutions focused on the diagnosis and treatment of central nervous and sensory system disorders for patients of all ages, Natus Medical Incorporated is committed to the highest standards of ethical business conduct. This Code of Conduct, or Code for short, summarizes Natus' compliance and ethical policies for all employees. For the purposes of this Code, all Natus Board Members, Company Officers and employees are considered Natus Employees. The Code is intended to define our company's expectations for how we as Natus Employees should conduct our day to day business, to help drive our decision making, and to create a culture of compliance throughout the company.

The Board of Directors expects all Natus Employees to read and become familiar with the policies and expectations described within this Code. In addition the Board has appointed a Compliance Officer to ensure Natus' adherence to this Code and all other business policies as part of Natus' Compliance Program. While serving in this capacity, the Compliance Officer reports directly to the Board of Directors and is responsible for ensuring that:

- training on this Code is included in orientation programs for all Natus Employees,
- training is provided to existing Natus Employees on an ongoing basis as needed,
- compliance certification is obtained by all Natus Employees on an annual basis, and
- the Board of Directors receives status reports on the Compliance Program.

COMPLIANCE WITH ALL LAWS, REGULATIONS AND COMPANY POLICIES

Natus will comply with all applicable laws and regulations and is committed to:

- Maintain a safe and healthy work environment,
- Promote a workplace that is free from discrimination or harassment based on any reason,
- Prohibit any retaliation, threat, demotion, discharge, or any other adverse action against any person who acts in good faith in reporting any violation of this Code,
- Comply with all applicable medical device regulations and standards to produce safe and effective medical devices
- Comply with all applicable legal requirements governing the marketing and sale of medical devices,
- Support fair competition and trade compliance laws and regulations, including all applicable global export, import and sanctions,
- Prohibit any illegal payments, gifts, or gratuities to any customer, government official or political party,
- Prohibit the unauthorized use of any trade secrets, confidential or copyrighted information,
- Comply with all applicable accounting and securities laws,
- Protect the privacy rights of our employees, our customers and their patients and
- Comply with all applicable environmental laws.

While this Code is not intended to be a comprehensive guide to all of Natus' legal responsibilities, all Natus Employees are expected to be familiar with the laws, regulations and company policies within their respective area.

Violations of the law, this Code or other business policies may lead to disciplinary action, including dismissal.

ETHICAL CONDUCT

All Natus Employees are required to deal ethically, fairly and honestly with coworkers, customers, competitors, distributors, government officials, suppliers or other third parties. Serving patients, healthcare professionals and medical institutions effectively is one of our most important goals. While conducting business we:

- Prohibit accepting or providing bribes, kickbacks or any other form of improper payment,
- Prohibit all gifts or favors to any customer, government official or supplier,
- Require clear and precise communication in our advertising and other public statements without any misleading information,
- Ensure accuracy on all invoices to customers of the sale price and terms of sale for products sold or services rendered,
- Protect all proprietary data provided by our customers, distributors or suppliers per our agreements with them or as required by law, and
- Prohibit Natus Employees from taking unfair advantage of our customers, distributors or suppliers through the manipulation of information or any other unfair dealing practice.

Additional ethical requirements for employees dealing with healthcare professionals or government officials may be found in the following business policies:

- NATUS-028: *Foreign Corrupt Practices Act Policy and Compliance Program*
- NATUS-035: *Policy on Acceptable Communication with Health Care Professionals*
- NATUS-036: *Policy on Natus-Conducted Programs & Meetings with Health Care Professionals*
- NATUS-037: *Policy on Paying for Travel & Lodging, Gifts and Entertainment for Healthcare Professionals*
- NATUS-039: *Policy on Educational & Research Grants, Charitable Donations and Commercial Sponsorships*
- NATUS-041: *Policy on Consulting and Payment Arrangements with Health Care Professionals*

Additional ethical expectations and requirements for the Board, Officers and employees of the Finance Department can be found in NATUS-002: *Code of Ethics for Financial Officers*.

CONFLICTS OF INTEREST

A conflict of interest occurs when a relationship or activity could influence your judgment to perform your job duties objectively. Even the appearance or perception of a conflict of interest can place Natus at risk. We should never allow personal gain to prevent us from doing what is right. All Natus Employees must avoid conflicts of interest at all times and ensure no business decision be made based upon anything other than the best interests of the company.

In order to prevent conflicts of interest from occurring, Natus prohibits the following activities without first disclosing to the company and given specific written approval that a conflict does not exist:

- Owning any financial interest or working relationship with a competitor,
- Conducting business on behalf of Natus with a friend, relative or business they are associated with,
- Accepting gifts, payments or any other form of compensation from a contractor, distributor, supplier or vendor for themselves or a friend or relative.

CONFIDENTIALITY AND CORPORATE ASSETS

Natus Employees may be entrusted with confidential information from within the company or business partners. This information may include:

- information about current and future products or services,
- business or marketing plans or projections,
- earnings and other internal financial data,
- personnel information,
- supply and customer lists,
- protected health information, and
- other non-public information that that may be harmful to Natus customers, distributors or suppliers if disclosed.

This information is the property of Natus or the property of our customers or business partners. Unless given explicit instruction to do so, employees should not disclose any confidential information to a third party, especially when dealing with the press. All Natus Employees are required to sign an Employee Invention and Confidentiality Agreement that contains specific requirements to protect confidential information and trade secrets upon employment.

Natus assets also include email, instant message, intranet, authorized social media accounts, voicemail services and other electronic records. All company business must be conducted using company email and not a personal email account. In order to keep these electronic assets safe and secure all employees are required to adhere to NATUS-029: *Natus Information Security Manual*.

INSIDER TRADING

It is illegal for Natus Employees to trade Natus stock while in the possession of material nonpublic information about the Company. It is also illegal for Natus Employees to give material nonpublic information to others who may trade on the basis of that information. All Natus Employees are required to sign Natus' Inside Trading Policy that contains specific requirements for trading Natus stock upon employment.

TRUE AND ACCURATE RECORD KEEPING

Various laws and regulations require Natus Employees to be honest and accurate in our financial and quality records. Throughout all aspects of our business, Natus employees are required to keep true and accurate records that maintain the integrity of our financial and regulatory compliance.

Additional financial record requirements for the Board of Directors, Company Officers and employees of the Finance Department can be found in NATUS-002: *Code of Ethics for Financial Officers*.

Additional quality record requirements can be found in QMS-000001: *Corporate Quality Manual*.

USE OF COMPANY PROPERTY

In the absence of prior Company approval, assets of Natus should be used only for legitimate business purposes. All Natus Employees have an obligation to use Natus property efficiently and to report any theft or damage to appropriate Natus management.

MANAGER RESPONSIBILITY

If you manage other employees, you have a special and important responsibility to set an example and act in a manner consistent with this Code. These responsibilities include:

- Act as a role model, demonstrating ethical behavior in the performance of your duties,
- Make fair and objective business-based decisions,
- Review the Code as needed with your employees
- Ensure employees are aware of, and properly trained on, the relevant laws, regulations and Company policies that govern the business activities that they are engaged in on behalf of the Company,
- Create an environment where employees are comfortable speaking up without fear of retaliation,
- Take seriously any concern raised by an employee that compromises our Code, and take time to understand if the issue should be escalated, and escalate issues as needed,
- Take action when employees violate the Code,
- Fully support any compliance investigation, and
- Recognize and reward ethical behavior.

QUESTIONS AND GUIDANCE ON THE CODE AND OTHER NATUS POLICIES

Natus has processes in place to help you follow this Code, company policies and the law. The Compliance Officer can field any question on the Code in writing at: Compliance_Officer@natus.com. Additionally, the following employees and departments can help answer questions in their respective areas:

- Your manager, supervisor and department leadership can answer questions for policies that apply to your respective duties.
- Finance can answer questions related to financial, company controls and accounting matters.
- Humans Resources can answer questions about employment, benefits and workplace issues.
- IT can answer questions regarding infrastructure cybersecurity.
- General Counsel can assist you with any question you may have interpreting the law.
- Quality Assurance can answer questions regarding the quality and regulatory compliance of our products.

REPORTING VIOLATIONS

Natus attempts to foster an environment in which ethical issues or concerns may be raised and discussed with supervisors or management without fear of retribution. All employees have an obligation to be vigilant for events that indicate unethical or illegal conduct. **Natus will not allow any retaliation, harassment, threat, demotion, discharge, or any other adverse action against any person who acts in good faith in reporting any violation of this Code.**

Should you have a concern or question that you do not feel comfortable discussing directly with your supervisor, Human Resources or the Compliance Officer you may report the issue anonymously through our independent ethics and compliance reporting system: NAVEX EthicsPoint. Unless you explicitly direct otherwise while reporting, all reports received through NAVEX EthicsPoint will be kept anonymous to the fullest extent possible. Reports received through this system will be reviewed and investigated by management independent from the subject of the report. You may file a report either:

- By telephone at (844) 319-1609 in Canada and the United States, or
- Through a web-based form located at natus.ethicspoint.com

All reports, regardless of origin, will be taken seriously and reviewed promptly, discreetly, and professionally. Natus will review all reported violations and will determine appropriate response, including investigation, corrective action, preventative measures. Natus will involve the Chief Executive Officer or Board of Directors when required. All reports, investigations and follow-up actions will be treated confidentially to the fullest extent possible.

WAIVER AND AMENDMENT

Natus is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code is subject to modification. Any amendment or waiver of any provision of this Code must be approved in writing by the Board of Directors and will be immediately communicated to you.