TELA BIO, INC.

CODE OF BUSINESS CONDUCT AND ETHICS

Effective November 6, 2026

I. Introduction

This Code of Business Conduct and Ethics (the "Code") has been adopted by the Board of Directors (the "Board") of TELA Bio, Inc. (together with its subsidiary, the "Company") and summarizes the standards that guide the actions of all employees, officers, and directors of the Company. While covering a wide range of business practices and procedures, these standards cannot and do not cover every issue that may arise, or every situation where ethical decisions must be made, but rather constitute key guiding principles that represent Company policies and establish conditions for employment at the Company. From time to time we may adopt additional policies and procedures with which our employees, officers and directors are expected to comply, if applicable to them. By working at the Company, you agree to comply with the Code, and to revisit and review it regularly and whenever notified of material updates.

Our Company strives to foster a culture of honesty and accountability. Our commitment to the highest level of ethical conduct should be reflected in all of the Company's business activities including, but not limited to, relationships with employees, customers, suppliers, competitors, the government, the public, and our stockholders. All of our employees, officers and directors must conduct themselves according to the letter and spirit of this Code and avoid even the appearance of improper behavior. Even well-intentioned actions that violate the law or this Code may result in negative consequences for the Company and for the individuals involved.

One of our Company's most valuable assets is our reputation for integrity, professionalism, and fairness. This Code is designed to promote (i) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, (ii) full, fair, accurate, timely, and understandable disclosure in reports and documents the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in our other public communications, (iii) compliance with applicable governmental laws, rules and regulations, (iv) prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code and (v) to ensure accountability for adherence to the Code. We should all recognize that our actions are the foundation of our reputation and adhering to this Code and applicable law is imperative.

II. Compliance with Laws, Rules and Regulations

We are strongly committed to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules, and regulations that apply to our business, including, but not limited to, those that govern the development, manufacturing, marketing, promotion and distribution of products; securities laws; privacy laws; employment laws; and any other federal, state, or foreign law that applies in each jurisdiction in which we conduct our business. No employee, officer, or director of the Company shall commit an illegal or unethical act, or instruct others to do so, for any reason.

In certain aspects of our business, we have made additional commitments to comply with generally accepted industry codes of ethical conduct and institutional guidelines. In the event local laws and regulatory requirements differ from the Code or other Company policy, the stricter requirements shall generally apply.

For any questions regarding compliance or the laws, regulations, policies, or standards that may apply to your activities, please consult with the Company's Legal Department and Chief Executive Officer.

III. Trading on Inside Information

All employees, officers and directors who have access to confidential information about the Company or any other entity through such person's activities with the Company are not permitted to use or share that information for stock trading purposes or any other purpose except to conduct our business. Using non-public information of the Company or other entities to trade in securities, or providing a family member, friend or any other person with a "tip" is illegal. All non-public information should be considered inside information and should never be used for personal gain or to enable others to gain from trades in our stock. You are required to familiarize yourself and comply with the Company's Insider Trading Policy, copies of which are available on the Company's compliance portal. If you ever have any questions about your ability to buy or sell securities of the Company or a company with which we do business, you should contact the Chief Executive Officer, General Counsel or Chief Financial Officer.

IV. Protection of Confidential Proprietary Information

Confidential proprietary information generated and gathered in our business is a valuable Company asset. Protecting this information plays a vital role in our continued growth and ability to compete. All proprietary information, whether relating to the Company or entrusted to the Company by a customer, supplier, or other business partner, should be maintained in strict confidence, except when disclosure is authorized by the Company or required by law.

Proprietary information includes all non-public information that might be useful to competitors or that could be harmful to the Company, its customers or its suppliers if disclosed. Intellectual property, such as trade secrets, patents, trademarks and copyrights, as well as business, research and new product plans, objectives and strategies, clinical trial results, records, databases, salary and benefits data, employee medical information, customer, employee and suppliers lists, any unpublished pricing information and any information about patients on whom our products have been used must also be protected. In addition, financial information about the Company should, under all circumstances, be considered confidential unless and until it has been made public in a press release or a report filed with the SEC.

To help protect confidential information, the following principles should apply:

- using caution when conducting business activities in a public space;
- monitoring and confirming requests for information from external sources;
- appropriately marking and identifying any confidential and proprietary information;
- exercising care when storing and transmitting confidential information;

- securing confidential information while working in unsecure workspaces or public areas;
- promptly reporting any incident of improper or accidental disclosure to your supervisor and the please consult the Company's Legal Department and the Chief Executive Officer; and
- obtaining valid confidentiality and non-disclosure agreements with any third party, including customers and suppliers, prior to any disclosure and only disclosing confidential information as necessary for the authorized purpose.

Unauthorized or improper use or distribution of proprietary information violates Company policy and could be illegal. Improper use of confidential information includes using confidential information of the Company to make a personal profit or avoid a personal loss, or in any manner that is not exclusively in furtherance of the Company's business strategies or for the Company's benefit or that is otherwise outside the scope of your employment.[1] Unauthorized use or distribution could result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions. We respect the property rights and proprietary information of other companies and require our employees, officers, and directors to observe such rights. Indeed, the Company is often contractually bound not to disclose the confidential and proprietary information of a variety of companies and individuals, including inventors, vendors and potential vendors. In addition, Company employees who have signed non-disclosure agreements with their former employers are expected to fully and strictly adhere to the terms of those agreements.

Your obligation to protect the Company's proprietary and confidential information continues even after you leave the Company, and you must return all proprietary information in your possession upon leaving the Company.

V. Privacy

Employees are required to observe the provisions of any other specific policy regarding data protection, privacy and confidential information that the Company may adopt from time to time, as well as any applicable laws relating to data protection and privacy. If an employee becomes aware of any instance of inappropriate handling of information or data or any security breach, the employee should report it immediately to the Company's Legal Department and the Chief Executive Officer.

VI. Conflicts of Interest

Our employees, officers, and directors have an obligation to act in the best interest of the Company. All employees, officers, and directors should endeavor to avoid situations that present a potential or actual conflict between their interest and the interest of the Company.

A "conflict of interest" occurs when a person's private interest interferes in any way, or even appears to interfere, with the interest of the Company, including its affiliates. A conflict of interest can arise when an employee, officer, or director takes an action or has an interest that may make

[1] Note to Draft: This language was added to cover prediction market-type activity (i.e., Kalshi).

it difficult for him or her to perform his or her work objectively and effectively. Conflicts of interest may also arise when an employee, officer, or director (or his or her family members) receives improper personal benefits as a result of the employee's, officer's, or director's position at the Company.

Although it is not possible to describe every situation in which a conflict of interest may arise, the following are examples of situations that may constitute a conflict of interest:

- working, in any capacity, for a competitor, customer, or supplier while employed by the Company;
- accepting gifts of more than modest value or receiving personal discounts or other benefits as a result of your position at the Company from a competitor, customer, or supplier where you are in a position to influence a decision about that competitor, customer, or supplier;
- competing with the Company for the purchase or sale of property, products, services, or other interests;
- having an interest in a transaction involving the Company, a competitor, a customer, or a supplier (other than as an employee, officer, or director of the Company and not including routine investments in publicly traded companies);
- receiving a loan or guarantee of an obligation as a result of your position at the Company; and
- directing business to a supplier owned or managed by, or which employs, a relative or friend.

Situations involving a conflict of interest may not always be obvious or easy to resolve. You should report actions that may involve a conflict of interest to your supervisor and the Chief Executive Officer, General Counsel or Chief Financial Officer.

Engaging in any activity which raises an apparent or actual conflict of interest, whether direct or indirect, between the Company and any employee, officer, or director is prohibited unless otherwise consented to by the Company. For any employee (other than an officer), the employee should promptly disclose any conflict of interest to his or her supervisor, including all material information relating to the conflict, and seek a determination and prior authorization. The supervisor shall consult with the Chief Executive Officer, General Counsel or Chief Financial Officer prior to authorizing or approving any activities creating a conflict of interest. For any conflict of interest involving any officer or director, such conflict of interest shall be disclosed to the Chief Executive Officer, General Counsel or Chief Financial Officer and to the Nominating and Corporate Governance Committee of the Board (the "Nominating Committee"). Any conflict of interest that may qualify as a "Related Party Transaction" (as defined in the Company's Related Party Transaction Policy) shall be disclosed to the Chief Executive Officer, General Counsel or Chief Financial Officer, who shall notify the Audit Committee of the Board (the "Audit Committee"), pursuant to the procedures outlined in the Company's Related Party Transaction Policy.

VII. Protection and Proper Use of Company Assets

Protecting Company assets against loss, theft or other misuse is the responsibility of every employee, officer, and director. Loss, theft and misuse of Company assets directly impact our profitability. Any suspected loss, misuse, or theft should be reported to the Company's Legal Department and the Chief Executive Officer.

The sole purpose of the Company's equipment, vehicles, supplies, and technology is the conduct of our business. They may only be used for Company business consistent with all Company guidelines, including those applicable to Company-provided technology and software systems.

VIII. Corporate Opportunities

Employees, officers, and directors are prohibited from taking for themselves business opportunities that are discovered through the use of corporate property, information, or position. No employee, officer, or director may use corporate property, information, or position for personal gain, and no employee, officer, or director may compete with the Company (either themselves or in combination with another person or entity). Competing with the Company may involve engaging in the same line of business as the Company, or any situation where the employee, officer, or director takes away from the Company opportunities for sales or purchases of products, services or interests. Employees, officers, and directors owe a duty to the Company to advance its legitimate interests ahead of their own when the opportunity to do so arises.

IX. Relationships with Third Party Representatives

The Company relies on agents, distributors, consultants, and other third-party representatives in connection with various aspects of its business. It is essential that all third-party representatives who act on behalf of the Company share our commitment to quality, integrity, and ethical conduct. Third-party representatives acting on behalf of the Company are expected to comply with the standards set forth in this Code and all applicable laws and regulations.

Employees who engage with third-party representatives must take reasonable steps to ensure that such representatives have a reputation consistent with our values. No third-party representative should be permitted to engage in conduct on behalf of the Company that would violate this Code or applicable law if committed by a Company employee, officer, or director. Any known or suspected misconduct by a third-party representative should be reported promptly to the Chief Executive Officer.

X. Fair Dealing

The Company strives to compete vigorously and to gain advantages over its competitors through superior business performance, not through unethical or illegal business practices. Each employee, officer, and director of the Company should endeavor to deal fairly with customers, suppliers, competitors, the public, and one another at all times and in accordance with ethical business practices. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice. No bribes, kickbacks, or other similar payments in any form shall be made directly or indirectly to or for anyone for the purpose of obtaining or retaining business or obtaining any other favorable action. In addition, all business dealings must be on arm's length terms and free of any favorable treatment resulting from the personal interest of our directors, executive officers and

employees. The Company and any employee, officer, or director involved may be subject to disciplinary action as well as potential civil or criminal liability for violation of this Code.

Occasional business gifts to, or entertainment of, customers or suppliers (other than healthcare providers and government employees) in connection with business discussions or the development of business relationships are generally deemed appropriate in the conduct of Company business. These gifts should be given infrequently, of reasonable to modest value, not consist of cash or cash equivalents, and be compliant with any laws, regulations, or applicable policies of the recipient's organization. Gifts or entertainment in any form that would likely result in a feeling or expectation of personal obligation should not be extended or accepted. Every effort should be made to refuse or return a gift that is beyond these permissible guidelines. If it would be inappropriate or not possible to refuse or to return a gift, promptly report the gift to your supervisor or the Company's Legal Department and the Chief Executive Officer. Gifts to and entertainment of healthcare providers and government employees is prohibited. If you have any questions regarding a proposed gift to be offered to or by the Company, please consult with your supervisor or the Company's Legal Department and the Chief Executive Officer.

Except in certain limited circumstances, the Foreign Corrupt Practices Act and other applicable anti-corruption laws prohibit giving anything of value directly or indirectly to any "foreign official" for the purpose of obtaining or retaining business. When in doubt as to whether a contemplated payment or gift may violate any applicable anti-corruption laws, contact the Company's Legal Department and the Chief Executive Officer before taking any action.

XI. Accuracy of Records

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

XII. Quality of Public Disclosures

The Company has a responsibility to provide full and accurate information, in all material respects, in our public disclosures about the Company's financial condition and results of operations. Our reports and documents filed with or submitted to the SEC and our other public communications shall include full, fair, accurate, timely and understandable disclosure. In addition, the Company has established a Disclosure Committee consisting of senior management to assist in monitoring such disclosures.

XIII. Record Retention

The Company's records must be maintained, stored and when appropriate, destroyed in accordance with industry best practices, our internal policies and in compliance with all applicable laws and regulations. Under certain circumstances, such as litigation or governmental agency requests, the Company may be required to preserve documents and information beyond their normal retention period. Employees, officers, and directors shall never create, alter or destroy records or documents for impeding the efforts of any investigation, litigation, or government or regulatory agency investigation.

XIV. Compliance with this Code and Reporting of Any Illegal or Unethical Behavior

All employees, directors, and officers are expected to comply with all of the provisions of this Code. The Code will be strictly enforced throughout the Company and violations will be dealt with immediately, including subjecting persons to corrective and/or disciplinary action such as dismissal or removal from office. Violations of the Code that involve illegal behavior will be reported to the appropriate authorities. Situations that may involve a violation of ethics, laws, rules, regulations, or this Code may not always be clear and may require difficult judgment. Employees, directors, or officers should report any concerns or questions about a violation of ethics, laws, rules, regulations or this Code to their supervisors/managers, the please consult the Company's Legal Department and the Chief Executive Officer, or, in the case of accounting, internal accounting controls, or auditing matters, the Audit Committee. Any employee who fails to report known or suspected violations by another employee may also be subject to appropriate discipline.

Any concerns about a violation of ethics, laws, rules, regulations, or this Code by any senior executive officer or director should be reported promptly to the Chief Executive Officer, General Counsel or Chief Financial Officer. For any such concerns relating to the accounting, internal accounting controls, auditing matters, or legal compliance matters, the Chief Executive Officer, General Counsel or Chief Financial Officer shall notify the Audit Committee of any suspected violations; in all other matters, the Chief Executive Officer, General Counsel or Chief Financial Officer shall notify the Nominating Committee of any violation. Any such concerns involving the Chief Executive Officer, General Counsel or Chief Financial Officer may be reported directly to the Nominating Committee or Audit Committee, as appropriate.

Reporting of such violations may also be done anonymously through the following means:

Phone: 844-890-1608

E-mail: compliance@telabio.com

Written Correspondance:

TELA Bio, Inc.
Attn: Chief Executive Officer, General Counsel or Chief Financial Officer
1 Great Valley Parkway, Suite 24
Malvern, PA 19355

An anonymous report should provide enough information about the incident or situation to allow the Company to investigate properly. If concerns or complaints require confidentiality, including

keeping an identity anonymous, the Company will endeavor to protect this confidentiality, subject to applicable law, regulation, or legal proceedings.

The Company encourages all employees, officers, and directors to report any suspected violations promptly and intends to thoroughly investigate any good faith reports of violations. The Company will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith. Open communication of issues and concerns by all employees without fear of retribution or retaliation is vital to the successful implementation of this Code. All employees, officers, and directors are required to cooperate in any internal investigations of misconduct and unethical behavior and to respond to any questions in a complete and truthful manner.

The Company recognizes the need for this Code to be applied equally to everyone it covers. The Chief Executive Officer, General Counsel or Chief Financial Officer will have primary authority and responsibility for the enforcement of this Code, subject to the supervision of the Nominating Committee, or, in the case of accounting, internal accounting controls, or auditing matters, the Audit Committee, and the Company will devote the necessary resources to enable the Chief Executive Officer, General Counsel or Chief Financial Officer, as applicable, to establish such procedures as may be reasonably necessary to create a culture of accountability and facilitate compliance with the Code. Questions concerning this Code should be directed to the Chief Executive Officer, General Counsel or Chief Financial Officer.

XV. Reporting Violations to a Governmental Agency

You have the right to:

- report possible violations of state or federal law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization;
- cooperate voluntarily with, or respond to any inquiry from, or provide testimony before any self-regulatory organization or any other federal, state or local regulatory or law enforcement authority;
- make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, the Company; and
- respond truthfully to a valid subpoena.

You have the right to not be retaliated against for reporting, either internally to the Company or to any governmental agency or entity or self-regulatory organization, information which you reasonably believe relates to a possible violation of law. It is a violation of federal law to retaliate against anyone who has reported such potential misconduct either internally or to any governmental agency or entity or self-regulatory organization. However, deliberately providing false information as part of a report or investigation into a report shall be grounds for disciplinary action, including termination of employment.

Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act you may have performed. It is unlawful for the Company to retaliate against you for reporting possible misconduct either internally or to any governmental agency or entity or self-regulatory

organization. Any reports of suspected retaliation should be made promptly to the Chief Executive Officer, General Counsel, Chief Financial Officer or Senior Vice President, Human Resources.

Notwithstanding anything contained in this Code or otherwise, you may disclose confidential Company information, including the existence and terms of any confidential agreements between yourself and the Company (including employment or severance agreements), to any governmental agency or entity or self-regulatory organization.

The Company cannot require you to withdraw reports or filings alleging possible violations of federal, state or local law or regulation, and the Company may not offer you any kind of inducement, including payment, to do so.

Your rights and remedies as a whistleblower protected under applicable whistleblower laws, including a monetary award, if any, may not be waived by any agreement, policy form, or condition of employment, including by a pre-dispute arbitration agreement.

Even if you have participated in a possible violation of law, you may be eligible to participate in the confidentiality and retaliation protections afforded under applicable whistleblower laws, and you may also be eligible to receive an award under such laws.

XVI. International Business Laws

Our employees 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. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

- the Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;
- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with countries, or traveling to, subject to sanctions imposed by the U.S. government;
- U.S. Export Controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibits transfers of U.S.-origin items to denied persons and entities; and
- Antiboycott Regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.

XVII. Equal Opportunity, Non-Discrimination and Fair Employment

The Company's policies for recruitment, advancement and retention of employees are based on merit and business needs, and forbid discrimination on the basis of any criteria prohibited by law, including but not limited to race, color, veteran status, religion, gender, sex, sexual orientation, age, physical or mental disability, medical condition or national origin. Our policies are designed to ensure that employees are treated, and treat each other, fairly and with respect and dignity. In keeping with this objective, conduct involving discrimination or harassment of others will not be tolerated. All employees are required to comply with the Company's policy on equal opportunity, non-discrimination and fair employment, copies of which are available on the Company's compliance and human resource portals.

XVIII. Compliance with Antitrust Laws

The antitrust laws prohibit agreements or actions among competitors in restraint of trade or constituting unfair trade practices. As such, employees, officers and directors are prohibited from disclosing confidential information with competitors on such matters as prices, terms of sale to customers, and allocating markets or customers, or discussions with suppliers or customers concerning actions that would exclude competition in the marketplace. Antitrust laws in the various jurisdictions in which we operate can be very complex, and violations may subject the Company and its employees to criminal sanctions, including fines, jail time and civil liability. If you have any questions regarding the application of antitrust laws to our business, please consult the Chief Executive Officer, General Counsel or Chief Financial Officer.

XIX. Political Contributions and Activities

Any political contributions made by or on behalf of the Company and any solicitations for political contributions of any kind must be lawful and in compliance with Company policies. This Code applies solely to the use of Company assets and is not intended to discourage or prevent individual employees, officers, or directors from making political contributions or engaging in political activities on their own behalf. No one may be reimbursed directly or indirectly by the Company for personal political contributions.

XX. Environment, Health and Safety

The Company is committed to conducting its business in compliance with all applicable environmental and workplace health and safety laws and regulations. The Company strives to provide a safe and healthy work environment for our employees and to avoid adverse impact and injury to the environment and communities in which we conduct our business. Achieving this goal is the responsibility of all employees, officers, and directors. To ensure compliance with such standards, all employees, officers, and directors are expected to abide by all workplace policies and procedures implemented by the Company relevant to their jobs and/or the Company's facilities.

XXI. Alcohol and Drugs

The Company is committed to maintaining a drug-free work place. The Company prohibits the manufacture, distribution, sale, purchase, transfer, possession or use of illegal substances in the workplace, while representing the Company outside the workplace or if such activity affects work performance or the work environment of the Company. The Company further prohibits use of

alcohol while on duty, unless at Company-sanctioned events. Employees are prohibited from reporting to work, or driving a Company vehicle or any vehicle on Company business, while under the influence of alcohol, any illegal drug or controlled substance, or any other intoxicant.

XXII. Social Media

"Social Media" includes various modes of digitally published information and online content including, but not limited to, websites and applications for social networking (e.g., Facebook, Instagram and LinkedIn), micro-blogging sites (e.g., X); online discussion forums (e.g., Google Groups and Reddit), user-generated video and audio (e.g., YouTube and TikTok), wikis, podcasts, RSS feeds, file sharing, virtual worlds, electronic bulletin boards, text messaging, instant messaging and other forms of online communication.

Company employees should adhere to the following general principles when engaging in Social Media:

- only authorized personnel are permitted to make public statements on behalf of the Company or its products;
- do not make unauthorized disclosures of confidential information and generally avoid mixing personal and business-related content;
- always be truthful and accurate in postings and realize that online comments are never truly anonymous;
- never post anything that would violate Company policies against unlawful harassment, discrimination and retaliation; and
- use of Social Media must also comply with all applicable Company policies, laws and regulations related to product promotion, privacy, copyright, media interactions and conflicts of interest.

Everyone is personally, legally responsible for the content they publish. Always err on the side of caution and consult with your supervisor, or the Chief Executive Officer, General Counsel or Chief Financial Officer, should you have a question about the appropriateness of a Social Media post.

The Company respects your right to communicate concerning terms and conditions of employment. Nothing in this Code is intended to interfere with your rights under federal and state laws, including the National Labor Relations Act, nor will the Company construe this Code in a way that limits such rights.

XXIII. Waivers

Requests for waivers of a provision of this Code must be submitted in writing to the Chief Executive Officer, General Counsel or Chief Financial Officer for appropriate review. Any waiver of the provisions in this Code for directors, executive officers and other senior financial officers may only be granted by the Board and will be promptly disclosed to the Company's stockholders, if required by and in accordance with applicable laws, rules and regulations. Any waiver of this

Code for other employees may be granted by the Chief Executive Officer, General Counsel or Chief Financial Officer.

XXIV. No Rights Created

This Code is a statement of certain fundamental principles, policies and procedures that govern the Company's employees, officers, and directors in the conduct of the Company's business. It is not intended to and does not create any legal rights for any employee, customer, client, visitor, supplier, competitor, stockholder, or any other person or entity.

XXV. Administration, Modification and Amendment

The Nominating Committee is generally responsible for overseeing the establishment of procedures to enforce the Code, except for any matters relating to accounting, internal accounting controls, or auditing, or to the review and approval or ratification of Related Party Transactions, which are governed by the Audit Committee. The Nominating Committee and the Audit Committee will periodically review this Code and recommend any proposed changes to the Board for approval. Any amendments to this Code will be posted on the Company's website.

XXVI. Certification

You must sign, date and return the Certification set forth on Annex A attached hereto (or such other certification as the Chief Executive Officer, General Counsel or Chief Financial Officer may deem appropriate) stating that you have received, read, understand and agree to comply with this Code. The Company may require you to sign such a Certification on an annual basis, which Certification may be in electronic format. Please note that you are bound by the Code whether or not you sign the Certification.

Annex A

Certification

I hereby certify that:

1. I have read and understand TELA Bio, Inc.'s (the "Company") Code of Business Conduct and Ethics (the "Code"). I understand that the Chief Executive Officer, General Counsel or Chief Financial Officer is available to answer any questions I have regarding the Code.

2. Since I have been affiliated with the Company, I have complied with the Code.

3. I understand that this Code may be changed at any time and it is my responsibility to regularly review this Code and ensure I comply with any updates made. I will continue to comply with the Code, including any updates that may be made from time to time, for as long as I am subject to the Code.

Print name: _____

Signature: _____

Date: _____