

IMPINJ, INC.
WHISTLEBLOWER POLICY

(Adopted on June 16, 2016 and effective as of the closing of the Company's initial public offering)

1. POLICY OVERVIEW

The purpose of this Whistleblower Policy (“**Policy**”) is to ensure all directors, officers, employees, consultants, contractors and agents of Impinj, Inc. and its subsidiaries (“**Company**”) embrace a culture where anyone who becomes aware of what he or she reasonably believes is or could be (i) a failure in accounting, internal accounting controls or auditing matters, (ii) fraudulent financial information, or (iii) a known or suspected violation of the Company’s Code of Business Conduct and Ethics (“**Code**”), can raise his or her concern about (i), (ii), or (iii) (hereinafter “**Complaint**”) free from harassment, discrimination or retaliation. This Policy encourages you to raise any Complaint as soon as possible.

The Audit Committee has established this Policy for:

- receiving, investigating and retaining Complaints; and
- enabling Company employees to confidentially and anonymously submit Complaints.

2. SUBMITTING COMPLAINTS

Non-employees may submit Complaints by mail to:

Impinj, Inc.
400 Fairview Avenue North
Suite 1200
Seattle, WA 98109
Attn: General Counsel

Employees may submit Complaints in one of the following ways (confidentially and anonymously, if you wish):

- (i) To the General Counsel anonymously by utilizing the In Touch service described in (ii) below. You may also contact the General Counsel via regular email at ymorikubo@impinj.com.
- (ii) If your Complaint relates to accounting, internal controls or auditing matters, or if the General Counsel is implicated by the Complaint, then you may contact the Board’s Audit Committee. The Company has contracted In Touch, an independent company, to handle these types of Complaints. You may report your Complaint using either the website or toll-free number on an anonymous basis; however, the investigation may be more effective in obtaining follow-up or clarifying information if you identify yourself. If you make an anonymous report then please provide as much detail as possible, including copies of any relevant documents. In Touch can be utilized:

By phone (toll free): 1-844-308-2524

By Web: www.InTouchWebsite.com/Impinj

By email: Impinj@GetInTouch.com

EthicsPoint provides any Complaints it receives to the Chairman of the Audit Committee.

The Company will also publish these methods for submitting Complaints on the Company's internal and external websites.

When you submit a Complaint please include at least the following items:

- a description of the Complaint;
- the period of time when you or another person observed the Complaint; and
- any steps you or another person have taken to investigate the Complaint, including reporting it to a supervisor and the supervisor's actions (if any).

When submitting a Complaint you have the option to include your identity and contact information, which are helpful if an investigation requires additional information. However, you are not required to provide your identity if you choose to remain anonymous. Please note, however, that if you do not provide contact information and your submitted Complaint does not contain sufficient information then it may be difficult for the Company or an outside party to investigate the matter fully. Therefore, please ensure your submitted Complaint is as complete and thorough as possible.

Except for Complaints sent directly to the Audit Committee or requested by you to be forwarded in confidence to the Audit Committee, all Complaints are sent to the General Counsel's office for treatment as set forth below.

3. COMPLAINT TREATMENT

The Company will log Complaints related to accounting and auditing on an accounting and auditing matters log which includes, among other things, the date the Company received the Complaint, a description of the Complaint, the name of the reporting person (if provided) and the result of an investigation into the Complaint. The Company shall acknowledge receiving the Complaint, within reasonable time after receipt, if the person who submitted the Complaint provided sufficient information for the Company to reply.

The Company will log all other Complaints, including suspected Code violations, separately from the accounting and auditing matters log, as well as forward them to the appropriate person or department for investigation, unless the General Counsel chooses other treatment (for example, if a Complaint involves a finance employee or an executive officer).

For Complaints not initially directed to the Audit Committee, the General Counsel will report material Complaints promptly to the Chairperson of the Audit Committee. The General Counsel will also provide the Audit Committee with a quarterly report of all received Complaints and their investigations.

Except for Complaints the Audit Committee feels require special treatment, the General Counsel will review, direct and oversee the resolution of Complaints, engaging other parties as appropriate.

The Audit Committee may request special treatment for a Complaint and may assume the direction and oversight of an investigation into it (with whatever assistance the Audit Committee deems appropriate). The Audit Committee shall request special treatment for significant accounting or auditing matters such as allegations of fraud or allegations of accounting or auditing matters or those involving executive officers.

The Audit Committee shall request special treatment for, investigate, and determine appropriate disciplinary action if a Complaint relates to a Board member or an executive officer. The Audit Committee may designate others to conduct or manage such investigation on its behalf.

When appropriate, the General Counsel or Audit Committee will report the results of investigations into Complaints, including corrective actions, to the person who submitted the Complaint if that person provided sufficient information for the Company to reply, maintaining the person's anonymity to the fullest extent possible.

The General Counsel shall retain Complaints, the accounting and auditing matters log, and all other related documentation as required by law.

If you submit a Complaint the Company will maintain your confidentiality to the fullest extent possible. See the Company's Code of Business Conduct and Ethics for Company procedures pertaining to Complaint investigations and possible disciplinary actions.

4. WHISTLEBLOWER PROTECTIONS

The Company prohibits reprisal, threats, discrimination, harassment, retribution, or retaliation in any way against any person who has in good faith reported a Complaint, or against any person who assists in any investigation or process with respect to such Complaint. If you believe you are or have been subjected to reprisal, threats, discrimination, harassment, retribution, or retaliation for having submitted a Complaint or for participating in an investigation related to a Complaint then immediately report the issue to the General Counsel, an executive officer, or any supervisor. The Company will promptly and thoroughly investigate any assertion that a manager, supervisor, or employee is involved in discrimination, retaliation, or harassment related to you reporting or the Company's subsequent investigation of a Complaint. The Company will not tolerate discrimination, retaliation, or harassment; if such behavior is substantiated then the Company will take appropriate action, up to and including termination.

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The Company is committed to continuously reviewing and updating its policies and procedures. It reserves the right to amend or terminate this policy at any time and for any reason. The proscriptions in this policy do not constitute a complete list of restrictions or a complete list of the types of conduct that can result in discipline, up to and including discharge.