

8.2 These Affirmative Action Programs are designed to ensure that, at a minimum, a good faith effort will be made to correct any imbalances in employment patterns of the Company and to ensure that the Company prohibits any discrimination on the basis of race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor. All employees of the Company are expected to assist in the implementation of this plan and to give their full support to the provisions of this program.

9. **Definitions**

9.1 Protected group members (those persons currently covered by Affirmative Action programs) are:

- (a) Women
- (b) Minorities - Blacks, Hispanics, Asian Americans, and Native Americans
- (c) Persons over the age of 40
- (d) Disabled individuals
- (e) Disabled veterans and veterans of the Vietnam War era

9.2 Race/ethnic categories (groupings used to identify persons for Affirmative Action record-keeping purposes) are as follows:

- (a) Black - All persons having origins in any of the Black racial groups of Africa.
- (b) Hispanic - All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin.
- (c) Asian or Pacific Islander - All persons having origins in any of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands.
- (d) American Indian or Alaskan Native - All persons having origins in any of the original peoples of North America.
- (e) White (not of Hispanic origin) - All persons having origins in any of the original peoples of Europe, North Africa, or the Middle East.

10. **Reports and Records**

10.1 At each location where hiring or other personnel transactions take place, a record of all personnel transactions will be made on the EEO logs (Form 3-1 through 3-4, Applicant Flow Log, Record of Affirmative Action Taken, Transfers/Promotions, and Termination Logs).

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**Joint Replacements**

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**Trauma, Extremities & Deformities**

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**Craniomaxillofacial**

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**Spine**

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**Biologics**

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**Surgical Products**

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**Neuro & ENT**

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**Interventional Spine**

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**Navigation**

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**Endoscopy**

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**Communications**

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**Imaging**

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**Patient Care & Handling Equipment**

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**EMS Equipment**

# Equal Employment Opportunity/ Affirmative Action Corporate Policy Number Two



**Copies of all Corporate Policies  
may be found on  
[www.stryker.com/corporatepolicies](http://www.stryker.com/corporatepolicies)**

2825 Airview Boulevard  
Kalamazoo, MI 49002  
t: 269 385 2600 f: 269 385 1062

## Purpose:

To outline the Company's policy with regard to Equal Employment Opportunity and Affirmative Action Programs.

## Scope:

This policy applies to all domestic employees of the Company and all U.S. citizens employed by any of the Company's foreign operations. The following areas will be outlined in this policy and procedure:

1. Equal Employment Opportunity/Affirmative Action Policy
2. Responsibilities
3. Harassment
4. EEO/AA Complaint Resolution Procedure
5. Recruitment
6. Company Facilities and Activities
7. Support of Action Programs
8. Affirmative Action Compliance Programs
9. Definitions
10. Reports and Records

## Details:

### 1. Equal Employment Opportunity/Affirmative Action Policy

1.1 Stryker Corporation is committed to providing Equal Employment Opportunity to all employees and applicants for employment on the basis of skills and ability and regardless of race, color, creed, religion, sex, age, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor. In conformity with Presidential Executive Order 11246, as amended, and applicable state and local ordinances, the Company will take Affirmative Action for the purpose of maintaining a balanced and representative workforce and to ensure Equal Opportunity for all applicants and employees. Our policy of Equal Opportunity and Affirmative Action applies to all phases of the employment process including, but not limited to, recruitment, selection, promotion, transfer, demotion, layoff, termination, compensation, benefits, and other terms and conditions of employment, and further requires maintaining a work atmosphere free of bias, including the prevention of harassment.

1.2 The Equal Employment/Affirmative Action policy statement signed by the Company's Chief Executive Officer and President shall be posted on all Company bulletin boards and disseminated to all managers and supervisors.

### 2. Responsibilities

2.1 The President or executive in charge of each division, subsidiary, or operating unit is responsible for ensuring that the Company's EEO/Affirmative Action policies are followed. Responsibility for the coordination and implementation of the policy and program within each division, subsidiary, or operating unit rests with the Human Resources director.

2.2 All managers and supervisors in all departments at all Company facilities have, as a part of their duties, the responsibility for the support of EEO/Affirmative Action.

2.3 It is the responsibility of every employee in the Company to ensure that Stryker Corporation is in full compliance with this policy. Any actions by employees which could cause Stryker to be in noncompliance may subject them to corrective action.

2.4 All Company suppliers, vendors, and business partners shall be equal opportunity employers and shall support EEO/Affirmative Action.

### 3. Harassment

3.1 The Company's policy prohibiting discrimination is deemed to include the prohibition of harassment based on race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor. Harassment of any nature is expressly prohibited at Stryker.

3.2 Harassment includes, but is not limited to, disparaging remarks, innuendoes, slurs, demeaning written or graphic material, or demeaning physical or verbal confrontations that are made in regard to race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor.

3.3 Sexual harassment includes unwanted sexual behavior, comments, suggestions, physical contact, propositions backed by implied or actual threats of loss of job, demotion, lowered status, or any other employment-related retribution. Sexual harassment does not include personal compliments welcomed by the recipient, or social interaction or relationships freely entered into by the employees.

3.4 Each manager and supervisor is responsible for maintaining a work environment free of bias and harassment and in helping to ensure that each employee is treated with dignity and respect. Managers and supervisors shall, with the assistance of the Human Resources director, take immediate action to investigate and resolve any allegations of discrimination or harassment using the prescribed complaint resolution procedures.

### 4. EEO/AA Complaint Resolution Procedure

4.1 Stryker Corporation has established a special procedure for handling the concerns and complaints of any employee who feels that he or she has been the subject of discrimination or harassment.

4.2 The Human Resources director or appointed representative shall act as the liaison for the in-house resolution of any employee concerns or complaints relating to Equal Opportunity or Affirmative Action.

4.3 If any employee feels that he/she has been adversely affected in his/her employment because of discrimination, or has otherwise suffered because of a co-worker's or management's actions which are counter to the Company EEO/AA policy, he/she should bring his/her concerns to the attention of his/her immediate supervisor and/or the Human Resources director or officer. While employees are encouraged to first seek assistance from their immediate supervisor, the employee may, at any time, bring his/her respective concern directly to the attention of the Human Resources director.

4.4 The Human Resources director is responsible for ensuring documentation of all reports of discrimination or other EEO-related concerns and for taking prompt action, or to coordinate with others as necessary to take action, to investigate and resolve the situation. Based on the facts presented, the situation may be resolved through informal channels or may necessitate a full, impartial investigation by uninvolved management and/or the Human Resources director. The employee will be apprised of any formal investigation or informal resolution process.

4.5 All efforts will be made to maintain employee confidentiality with the understanding that effective complaint resolution may warrant this impractical in some circumstances.

4.6 If the employee wishes to pursue an EEO complaint beyond the in-house options available, the Human Resources director will apprise the employee of State and Federal EEO complaint processing options.

### 5. Recruitment

5.1 In order to provide job opportunities to all applicants without regard to race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, or any other impermissible factor, the Company will advise recruiting sources, on a regular basis, of its commitment to Equal Employment Opportunity. These recruiting sources will be requested to refer applicants to the Company in a nondiscriminatory manner. All employment advertising placed for any position will contain the phrase "An Equal Opportunity/Affirmative Action Employer" to further emphasize that the Company recruits in a nondiscriminatory manner.

5.2 To ensure that minority group members, veterans, disabled individuals and women are included in the Company's recruitment effort, agencies and organizations which serve these individuals will be included regularly as recruiting sources.

### 6. Company Facilities and Activities

6.1 All Company facilities, including lunchrooms, restrooms, and other common areas, shall be maintained in a non-segregated manner. Recreational and social activities also shall be provided in a non-segregated basis and all employees will be encouraged to participate.

### 7. Support of Action Programs

7.1 The Company encourages each of its employees to participate in community action programs designed to improve the job opportunity and working conditions of females, minorities, disabled citizens, disabled veterans or veterans of the Vietnam War era. The Company particularly encourages its managerial and supervisory employees to serve in such community activities.

### 8. Affirmative Action Compliance Programs

8.1 In accordance with Executive Order 11246, as amended, the rules and regulations issued by the U.S. Department of Labor to implement the Executive Order, the domestic divisions and subsidiaries of the Company will maintain a written Affirmative Action Plan.