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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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**Patient Care & Handling Equipment**

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**EMS Equipment**

# Sexual and Other Unlawful Harassment

## Corporate Policy Number Three



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

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## **Purpose:**

To outline the Company's policy prohibiting sexual and other unlawful harassment.

## **Scope:**

This policy applies to all employees of Stryker Corporation. The following areas will be outlined in this policy/procedure:

1. Harassment Policy
2. Responsibilities
3. Complaints
4. Investigations
5. Resolutions
6. Definitions

## **Details:**

### 1. **Harassment Policy.**

1.1 Stryker Corporation is committed to providing a work environment that is free of discrimination, intimidation, and unlawful harassment. Actions, words, jokes or comments based on an individual's sex, race, ethnicity, age, disability, religion or any other legally protected characteristic will not be tolerated.

### 2. **Definitions and Examples.**

2.1 Sexual harassment is unwelcome sexual advances, requests for sexual favors, and other physical, verbal, or visual conduct based on gender when:

- (a) submission to the conduct is an explicit or implicit term of employment; or
- (b) submission to or rejection of the conduct is used as the basis for an actual or implied employment decision, including job loss, demotion, or change in responsibility or benefits; or
- (c) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or of creating an intimidating, hostile or offensive work environment.

2.2 Sexual harassment can include any of the following types of behavior:

- (a) explicit sexual propositions;
- (b) sexual innuendo;
- (c) sexually suggestive comments, epithets, or slurs;
- (d) sexually oriented teasing or kidding;
- (e) sexually oriented jokes;
- (f) obscene gestures or language;
- (g) obscene or sexually suggestive pictures or drawings;
- (h) physical contact, such as patting, pinching or touching.

### 3. **Responsibilities.**

3.1 The President or executive in charge of each division, subsidiary, or operating unit is responsible for ensuring that the Company's harassment policy is followed. Responsibility for the coordination and implementation of the policy for each division, subsidiary, or operating unit rests with the Human Resources director.

3.2 All managers, supervisors, team leaders, vendors, suppliers, and business partners are responsible for supporting and enforcing this harassment policy.

3.3 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 violation of the policy may be subject to disciplinary action up to and including termination.

3.4 It is the responsibility of each employee who believes that he or she has been the object of sexual or other unlawful harassment to advise the alleged harasser to stop the unwanted activity.

### 4. **Complaints.**

4.1 Complaints of acts of harassment or retaliation that are in violation of the policy will be accepted in writing or orally, and anonymous complaints will be taken seriously and investigated. Anyone who has observed sexual or other unlawful harassment should report it immediately.

4.2 Any employee who wants to report an incident of harassment should promptly report the matter to his or her supervisor or to the Human Resources director.

4.3 Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment should promptly advise the Human Resources director.

### 5. **Investigations.**

5.1 All complaints will be promptly and thoroughly investigated by the Human Resources director or other designee charged with investigating such complaints.

5.2 Anyone registering a complaint is assured of:

- (a) protection against retaliation for reporting sexual and other unlawful harassment;
- (b) the Company's commitment to investigate the allegations and to take appropriate action;
- (c) the Company's intention to maintain confidentiality regarding the allegations, insofar as it is practical to do so;
- (d) the Company's intention to inform the complainant of the results of the investigation and any action the Company decides to take.

### 6. **Resolutions.**

6.1 After reviewing the information gathered during the investigation, one of three conclusions can be reached:

- (a) misconduct occurred;
- (b) misconduct did not occur; or
- (c) there is insufficient evidence to reach a conclusion as to whether misconduct occurred.

6.2 The Company will communicate the conclusion to the complainant and the alleged harasser.

6.3 A determination that misconduct occurred will result in appropriate disciplinary action, up to and including termination.