

## To Make a Report

You may use any of the following methods to submit a report:

### 1. Telephone

Within the United States & Canada dial (866) 263-1439

All other countries, visit the Ethics Hotline website for international toll-free dialing instructions

### 2. Internet

[www.stryker.com](http://www.stryker.com)

Click on “Contact our Ethics Hotline”

### 3. Email

[ethicshotline@stryker.com](mailto:ethicshotline@stryker.com)

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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

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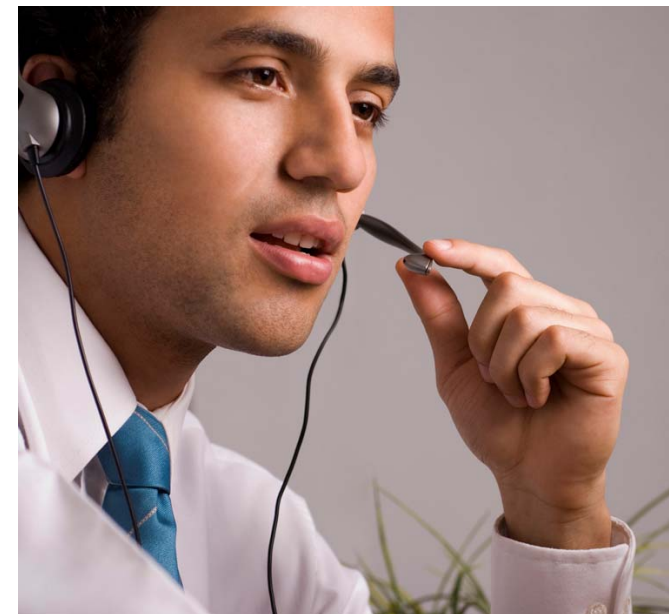
Ethics Hotline  
Corporate Policy  
Number Ten

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

Policy Date: 6/8/06

[www.stryker.com](http://www.stryker.com)



## Purpose:

To outline the procedures and guidelines surrounding the Ethics Hotline Policy.

## Scope:

This policy applies to all employees of Stryker Corporation.

## Description:

1. **Conduct.** The Company has policies on equal employment opportunity, harassment and sexual harassment, non-retaliation and the reporting by employees of improper, unethical or illegal conduct or activity, which can be found in our Equal Employment Opportunity/Affirmative Action Policy, Code of Conduct and Code of Ethics, all of which are posted on the corporate intranet. Employees are required (and have a responsibility) to report to management any conduct or activity that they believe may give rise to legal or ethical problems or violate applicable legal requirements. This includes, but is not limited to, discrimination; harassment; fraud; unethical or unlawful conduct; retaliation; improper conduct regarding accounting, internal accounting controls or auditing matters; violations of federal securities laws, the rules and regulations of the Securities and Exchange Commission ("SEC") or any other provision of federal law relating to fraud against stockholders and violations of any other laws.
2. **Ethics Hotline Committee.** This Ethics Hotline Policy is administered by the Ethics Hotline Committee (the "Committee"), consisting of the Vice President, Internal Audit, as the chairperson, the General Counsel, the Vice President, Human Resources, and the Chief Compliance Officer. The Ethics Hotline Committee was created to administer the Ethics Hotline and the Ethics Hotline Email, on which employees may leave confidential messages. Access to the Ethics Hotline and Ethics Hotline Email is limited to the Vice President, Internal Audit, or, in his absence, another Committee member designated by the Vice President.
3. **Reporting.**
  - 3.1 An employee may report any suspected improper, unethical or illegal conduct or activities to the President or executive in charge of the applicable division, subsidiary or operating unit or to the Chief Executive Officer, Chief Finan-

cial Officer, Vice President Human Resources, General Counsel, or Chief Compliance Officer of the Company as set forth in our Code of Conduct. However, if an employee feels uncomfortable reporting suspected improper, unethical or illegal conduct or activities in such manner, the employee may report the conduct or activity directly to a member of the Ethics Hotline Committee or anonymously through the Company's Ethics Hotline or Ethics Hotline Email.

3.2 Not less frequently than every other business day the Vice President, Internal Audit or another Committee member designated by the Vice President will review messages received on the Ethics Hotline and Ethics Hotline Email and record such messages on a confidential log maintained by the Vice President containing the following data:

- date of message;
- contact number or other information (if provided);
- summary of the issues raised;
- operating area (s) to which the issue applies;
- Individual (s) identified (if any);
- person to whom issues are referred and date of referral;
- action to be taken;
- date for follow-up/resolution; and
- status.

3.3 At least monthly the Ethics Hotline Committee will meet to review the matters identified in the log and their status or disposition.

3.4 At least quarterly and more frequently if requested, the Vice President, Internal Audit, will prepare a summary activity report to the Chairman of the Audit Committee of the Board of Directors. With respect to any issue that relates to disclosure controls and procedures, internal control over financial reporting or a related party transaction, the Vice President, Internal Audit will report on each such item. The Vice President, Internal Audit, will provide a copy of each report made to the Chairman of the Audit Committee to the Chief Executive Officer and to the other members of the Committee.

## 4. Retaliation.

4.1 The Company's policies expressly prohibit any form of retaliation against employees who: (1) in good faith and for lawful purposes report, cause to be reported, or assist in the investigation of suspected improper, unethical, or illegal conduct or activities by anyone at the Company; (2) lawfully provide, or cause to be provided, information to, or assist in an

investigation conducted by, any federal regulatory or law enforcement agency or legislative body, related to possible violations of securities laws, SEC rules or regulations, or laws relating to fraud; or (3) file, cause to be filed, assist, participate, or give testimony in any proceedings filed or about to be filed related to such conduct.

4.2 If an employee believes that he or she has been retaliated against (including threatened or harassed), he or she should report it to his or her immediate supervisor or manager. If an employee feels uncomfortable reporting such retaliation to his or her immediate supervisor or manager, the employee may report the retaliation directly to a member of the Ethics Hotline Committee or anonymously through the Company's Ethics Hotline.

## 5. Investigations.

5.1 Once an employee reports suspected improper, unethical, or illegal conduct or activities or retaliation identified in this Policy, the Company will investigate and keep the employee informed of the disposition to the extent permitted by law or otherwise appropriate under the circumstances. However, due to the confidential nature of such investigations, it may not be possible to provide specific details of the investigation or of the actions taken.

5.2 All investigations will be handled with sensitivity. Confidentiality will be maintained to the extent possible and appropriate under the circumstances, in light of the important privacy interests of all concerned.

5.3 The Company will endeavor to deal with all employee disclosures under this Policy and complete any and all related investigations in a timely manner.

5.4 The Company will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints.