

Supplier **code of conduct**



A message from Viju Menon, Group President

Mission

Together with our customers,
we are driven
to make healthcare better.

Values

Integrity
We do what's right

Accountability
We do what we say

People
We grow talent

Performance
We deliver

At Stryker, making healthcare better is at the heart of what we do. We develop innovative products and services, collaborating with our customers to improve the lives of patients worldwide. Achieving this mission requires strong partnerships built on shared values and a commitment to ethical and responsible practices.

Our Supplier Code of Conduct defines the expectations we have for all suppliers who work with us. It reflects our core values—Integrity, Accountability, People and Performance—and serves as a foundation for building a resilient, ethical and sustainable supply chain.

By working together with suppliers who share our dedication to excellence, we can advance healthcare and create a positive impact for patients, communities and the planet.

**- Viju Menon, Group President,
Global Quality and Business
Operations**



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Overview

Stryker Corporation and its affiliates (collectively, “Stryker”, “we”, “our” or “us”) are committed to conducting business ethically and lawfully. We expect the same from the businesses we partner with. Accordingly, we strive to select suppliers and vendors (collectively with their Representatives (defined below) referred to as “Suppliers”, “you”, “yours” or “their”) who share our commitment to Integrity, Accountability, People and Performance. While Suppliers operate as independent entities, their actions may impact our business, reputation and the workers and communities within our supply chain.

Supplier responsibilities

This Supplier Code of Conduct (the “Code”) outlines our expectations for all Suppliers. Stryker may engage in monitoring activities or targeted assessments to verify compliance with this Code and will collaborate with Suppliers to drive continuous improvements where needed.

In addition to fulfilling their contractual obligations, suppliers must:

- Ensure that their subsidiaries, affiliates, employees, agents, sub-suppliers and subcontractors (collectively referred to as “Representatives”) understand and comply with this Code.
- Monitor compliance with this Code across their operations and supply chain.
- Mitigate and remediate any potential or actual risk of non-compliance with this Code.

Compliance with laws, regulations and standards

Suppliers must comply with all laws applicable to the Supplier and the services and products provided by the Supplier and meet the highest standards within their respective industry. In addition, Suppliers must:

- Support Stryker's compliance with our obligations, including legal requirements, when requested, even if those requirements are not directly applicable to the Supplier.
- Conduct due diligence within their operations and supply chain to ensure compliance with all applicable laws and this code.



Business integrity

Suppliers must conduct their business interactions and activities in an ethical and lawful manner.

Fair competition

Suppliers must compete for all business opportunities fairly, ethically and legally, complying with all antitrust and fair competition laws. Practices such as collusive bidding, price fixing, price discrimination or other unfair trade practices are strictly prohibited.

Marketing and sales

Suppliers must represent their products and services accurately and comply with all applicable regulatory and legal requirements, governing the marketing and sale of their products and services, including those set by the U.S. Food & Drug Administration (FDA).

Fair dealing

Suppliers must deal fairly with customers, suppliers, competitors, auditors, employees and regulatory or government officials. Taking unfair advantage of others through manipulation, concealment, misrepresentation or abuse of information, is prohibited.

Improper payments

In line with our [Improper Payments policy](#), Suppliers must not make or accept improper payments to influence business decisions or gain an undue advantage. 'Improper' refers to any action that is intended to, or appears to, improperly influence a business decision or secure an unfair advantage. Suppliers should not offer gifts or entertainment (e.g., sporting events, theatrical shows) to our employees that could appear to influence or compromise judgement.

Conflicts of interest

Suppliers must take steps to identify, avoid, disclose and manage any actual or potential conflicts of interest, including those with your customers, government entities, or relationships with Stryker employees or their relatives.

Insider trading

Suppliers must not buy or sell Stryker's or another company's securities based on non-public information that could influence an investor's decision.





Intellectual property

Suppliers must respect Stryker's intellectual property rights, including patents, trade secrets, trademarks, copyrights and equivalent rights, and comply with all requirements governing their use.

Confidentiality

Suppliers must protect Stryker's confidential and proprietary information and avoid disclosing it to third parties without prior written consent. Confidential information may include, but is not limited to, financial and sales data, technical and product information (including samples), business strategies, research and regulatory information. Suppliers must also refrain from providing Stryker with any third-party confidential information without first obtaining appropriate consent from the relevant third-party.

Reporting and recording

Suppliers must maintain and report all information accurately and honestly. Suppliers must not sign or submit any document or statement (directly or indirectly on behalf of you or Stryker) that you know, or have reason to believe, is false. All records and reports must be created, retained and disposed of in compliance with applicable legal and regulatory requirements.

Unauthorized press/publicity

Suppliers must not release any statements, advertisements or other public information—including social media content—referring to Stryker without our prior written authorization. This includes our name, logo, products, parts, designs, relationships, or any other non-public information.

Data privacy

Suppliers must process all personal information in accordance with applicable data protection and privacy laws. Suppliers must respect the individual's privacy and implement adequate technical and organizational measures to secure personal information and prevent unauthorized access, alteration or loss.

Information systems security and use

Suppliers must comply with all applicable requirements, including our [Acceptable Use policy](#) and procedures for maintaining passwords, confidentiality and security. These requirements are conditions for providing products or services and accessing our internal systems, network or facilities. Technology provided by Stryker must only be used for authorized, business-related purposes.

Quality

Suppliers involved in the supply, manufacturing, packaging, re-packaging, testing, storage, and/or distribution of materials/products used or incorporated to Stryker's products are expected to establish and maintain an effective Quality Management System (QMS). Suppliers must also support regulatory body audits as necessary.

At a minimum, the QMS should include methods and processes to:

- Deliver products that meet specifications, requirements and regulations.
- Identify and promptly communicate product quality issues.
- Obtain formal approval before implementing any quality-impacting changes.
- Minimize the risk of introducing counterfeit parts and materials into deliverable products.

Business continuity planning

Suppliers must evaluate and address potential risks to their operations through a documented business continuity plan, which should be reviewed with us upon request. The plan should map Supplier's critical supply chains relevant to products supplied and identify potential risks. Supplier must promptly and openly communicate any unexpected events that could disrupt production or product delivery. Collaboration is expected to mitigate any identified risks and resolve production disruptions effectively.

Trade compliance

Suppliers must comply with all applicable laws and regulations governing the international movement of goods, technical information, software, and services, including customs, export control, sanctions, and anti-boycott laws. At a minimum, Suppliers must maintain internal controls to:

- Provide complete and accurate information and documentation required for the import and export of goods, including classifications, certificates of origin, invoices, and export authorizations.
- Screen transactions for restricted parties, end users, and end uses and prohibit business, directly or indirectly, with any individuals, organizations, or countries in violation of export controls, trade sanctions, and embargoes.
- Retain records and cooperate with requests for information, audits, or assessments to verify compliance with trade requirements.



Labor and human rights

In alignment with our [Position on Human Rights](#), Suppliers must conduct business in a manner that respects the rights and dignity of all people.

Forced labor

Supplier must prohibit all forms of forced or compulsory labor. This includes any work or service exacted under threat of penalty and performed involuntarily, including debt bondage and human trafficking.

Child labor

Supplier must strictly prohibit child labor. Employment practices must comply with International Labour Organization (ILO) conventions or national law, whichever is stricter, regarding child labor and the employment of underage workers. Under no circumstances should the age of employment be less than 15 years, unless permitted by the [Minimum Age Convention \(ILO 138\)*](#).

Non-discrimination

Suppliers must maintain a workplace free from discrimination and harassment. Discrimination based on sex, race, color, ethnicity, national origin, ancestry, citizenship, age, disability, illness or history thereof, creed, religion, service in the armed forces, marital or veteran status, sexual orientation, gender identity or expression, economic or social status or any other legally protected characteristic is strictly prohibited.

Freedom of movement

Suppliers must ensure employees have the freedom to leave the workplace or terminate their employment without unreasonable restrictions. Suppliers must not hold original copies of employee identification documents, such as passports or other identity papers.

Freedom of association

Suppliers must comply with all applicable laws protecting employees' rights to freely associate or not associate with any legally constituted group.

Wages, working hours and benefits

Suppliers must comply with all applicable wage and hour laws and regulations, including those related to minimum wages, maximum working hours per week, overtime, piece rates and proper employee classification. Suppliers must provide all legally required benefits and must not impose unlawful wage deductions as a disciplinary measure. When overtime is required, Suppliers must clearly communicate such requirements to employees.

Employment information

Suppliers must provide employees with clear and accurate information about wages, benefits, working hours and other terms and conditions of employment.



Recruitment fees

Suppliers must not require workers to pay recruitment fees, either directly or through third parties, as a condition of obtaining or maintaining employment.

Immigration laws and proper documentation

Suppliers must employ or use only workers who have a legal right to work in the jurisdiction where they are hired. Suppliers must review all legally required documentation to verify the legal right to work status of prospective employees before hiring.

Land rights

Suppliers must prohibit unlawful eviction and deprivation of land, forests and water resources that communities and individuals rely on for their livelihood.

Conflict minerals

Suppliers must exercise due diligence in their supply chains to mitigate potential risks of directly or indirectly supporting armed conflict and support Stryker's compliance with the [Dodd Frank Wall Street Reform and Consumer Protection Act*](#), [EU Conflict Minerals Regulation*](#) and our [Conflict Minerals Policy](#). Upon request, Suppliers are expected to participate annually in providing Conflict Minerals Reporting Templates (CMRT) in a timely manner and promptly disclose any changes to the status of minerals they become aware of, including the conformant status of smelters or refiners within their supply chain that impact our products.



Environment

We expect Suppliers to take practical steps to make their operations more sustainable and reduce their environmental impact.

Environmental authorizations

Suppliers must comply with all applicable environmental laws and legal requirements for environmental protection, maintaining all necessary licenses, permits and authorizations.

Chemicals regulations compliance

Suppliers must comply with all relevant chemical-related regulations. Additionally, Suppliers must support Stryker's compliance by disclosing the use of and strive to reduce to use of substances in materials supplied to us that are regulated under our Regulated Substance List (RSL) through our designated data portal.

Chemical-related regulations include, without limitation:

- [Stockholm Convention on Persistent Organic Pollutants \(POPs Convention\)*](#)
- [UN Minamata Convention on Mercury \(Minamata Convention\)*](#)
- [Restriction of Hazardous Substances \(RoHS\) Directive](#)
- [Registration, Evaluation Authorization and Restriction of Chemicals \(REACH\) Regulation](#)

Waste

Suppliers must handle, control and reduce waste and wastewater in an environmentally responsible manner. This includes maintaining systems and processes for the proper storage, recycling, reuse, or disposal. Any waste or wastewater that could adversely impact human health or the environment must be managed, controlled and/or treated in accordance with applicable laws and the POPs Convention before release into the environment. The export and import of hazardous and other forms of waste must comply with the [Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their Disposal \(Basel Convention\)*](#).

Emissions

Suppliers are expected to monitor and strive to reduce greenhouse gas (GHG) emissions. Upon request, Suppliers must provide information about these efforts and:

- Measure and report Scope 1, 2 and 3 emissions.
- Commit to setting a science-aligned climate target utilizing a recognized framework such as the Science Based Target Initiative (SBTi).
- Engage their own suppliers to cascade these requirements.

Environmental degradation

Suppliers must make reasonable efforts to assess the environmental impact of their business activities, including effects on biodiversity. Where appropriate, Suppliers must take reasonable steps to mitigate or prevent environmental degradation, including impacts on access to basic human needs, such as food, water and sanitary facilities. Also, suppliers are expected to monitor and strive to reduce water usage.



*External websites, links or platforms referenced within this document are provided for informational purposes only. Stryker does not monitor, control, or endorse the content of external sites and is not responsible for their policies, security or practices.

Workplace health and safety

Suppliers must ensure workplaces are safe and meet all relevant environmental, health and safety regulations.

Safe work environment

Suppliers must provide a safe, clean and healthy working environment that complies with all relevant environmental, health and safety laws, rules and regulations. Suppliers must strive to prevent occupational injuries and safety incidents by:

- Establishing and maintaining sufficient safety standards for the workplace, workstations and work equipment.
- Providing appropriate protective measures and equipment.
- Preventing excessive physical and mental fatigue by ensuring appropriate working hours and rest breaks.
- Adequately training and instructing employees to perform their duties safely.

Facility security

Suppliers must maintain adequate security at their facilities at all times. If security forces are hired or used, Suppliers must ensure they do not engage in intimidation, torture, cruel, inhumane, or degrading treatment, cause harm to life or limb, or interfere with employee's rights to organize or exercise freedom of association. Additionally, Suppliers must comply with our security procedures when present at our facilities.

Emergency preparedness

Suppliers must develop and maintain emergency plans and response procedures that comply with all applicable laws and regulations. These plans must address:

- Emergency preparedness, reporting and notification.
- Evacuation procedures, training and drills.
- Appropriate hazard detection and suppression equipment.
- Adequate exit facilities from Suppliers' sites.



Management systems

Suppliers must have a management system consisting of appropriate processes, procedures, personnel, and/or governance structure, designed to ensure compliance with this Code and all applicable laws, identify and mitigate operational risks and facilitate continuous improvement.



Risk assessment and risk management process

Supplier must establish a process to identify risks and legal compliance with the topics identified in this Code. Suppliers must determine the significance of each risk and implement appropriate procedural and physical controls to mitigate these risks and ensure regulatory compliance.

Communicate Supplier Code requirements to suppliers

Suppliers' management systems must include processes to communicate the requirements of this Code to their own suppliers and monitor their suppliers' compliance.

Complaint mechanism

Suppliers must provide a complaint mechanism that is free from threats of reprisal, intimidation or harassment, allowing workers and representatives to anonymously report workplace grievances and violations of this Code. All complaints must be promptly investigated with timely remedies and corrective actions implemented to prevent recurrence.

Conclusion

Speak up

We expect our Suppliers to speak up if they see or hear anything that seems improper, are unsure how to handle a specific situation or find any part of this Code unclear.

To seek guidance or raise ethical concerns:

- Talk to your procurement or business contact.
- Use our Ethics Hotline to report an incident.
 - If you would prefer to speak to someone confidentially, call us at (800) 461-9330.
 - If located in North America, you can anonymously text a question or concern to (269) 575-0779.

Accountability

In addition to any other rights under our agreements with Suppliers, Stryker reserves the right to take appropriate actions if a Supplier fails to comply with the standards outlined in this Code. Such actions may include, but are not limited to:

- Requiring the Supplier to implement corrective and/or preventative measures to address identified issues.
- Conducting follow-up monitoring or assessments of the effectiveness of any corrective and/or preventative measure.
- Terminating the relationship with the Supplier without notice, liability or obligation.

We expect Suppliers to collaborate with Stryker in good faith to resolve concerns and drive continuous improvement.

Additional information

For further details about Stryker's corporate policies, please visit the Corporate Governance page on www.stryker.com.



