

Stryker Supplier Code of Conduct

Stryker Corporation (collectively, “**Stryker**”, “**we**”, or “**us**”) is committed to conducting our affairs ethically and lawfully and we expect that businesses we associate with will do the same. Accordingly, we strive to select suppliers and vendors (collectively “**our Suppliers**”) that share our commitment to honesty, integrity, and corporate responsibility. We understand that, while our Suppliers are independent entities, their business practices and actions may impact us and our reputation. This Supplier Code of Conduct (“**Code**”) is intended to establish expectations for our suppliers, and their employees, agents, and subcontractors (referred to collectively as “**Representatives**”) and, in addition to any specific obligations under their agreements with us, we expect all of our Suppliers to adhere to this Code and any future versions as we may make amendments to it.

GENERAL BUSINESS

Our Suppliers shall conduct their business interactions and activities in an ethical and lawful manner and shall, without limitation:

- **Laws**: Comply with all applicable local, national, and trade laws, statutes, acts, ordinances, rules, codes, standards, guidelines and regulations of the jurisdictions where they are doing business, as well as the highest standards of their industries.
- **Fair Competition and Practices**: Compete for all business opportunities fairly, ethically, legally, and comply with all antitrust and fair competition laws regulating competition and trade in each country where they conduct business. Our Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws.
- **Marketing and Sales**: Represent their products and services accurately and comply with applicable regulatory and legal requirements governing the marketing and sale of their products and services.
- **Fair Dealing**: Deal fairly with customers, suppliers, competitors, independent auditors, employees, and any regulatory or government officials and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing or practice.
- **Improper Payments**: Not make any improper payments to government or non-government officials, employees, customers, persons, or entities, nor request or accept any improper payment from suppliers, customers, or anyone seeking to do business with them. Our Suppliers and their Representatives will not offer, promise, provide, request or accept (directly or indirectly) bribes or kickbacks of any kind, whether in dealing with public or government officials (including health care professionals and employees) or other private sector entities or individuals. Our Suppliers and their representatives shall comply with the anti-corruption laws and anti-money laundering laws of the countries in which they do business, and any other applicable prohibitions regarding any type of bribery, improper rebate or other corrupt practices, and any successor or replacement statutes, laws and

regulations, including without limitation, and to the extent applicable, the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act of 2010.

- **Gifts and Entertainment**: Observe our policies regarding gifts and entertainment including, but not limited to, avoiding the giving of gifts to our employees or creating a conflict of interest. Our Suppliers and their Representatives will not offer anything of value to obtain or retain a benefit or advantage and will not offer anything that might appear to influence, compromise judgment or obligate any of our employees.
- **Conflicts of Interest**: Avoid the appearance of or actual improprieties and/or conflicts of interests. Our Suppliers and Representatives shall not deal directly, in the course of negotiating a supplier agreement or performing their obligations for us, with any of our employees whose spouse, domestic partner, or other family member or relative holds a significant financial interest in the Supplier.
- **Recording and Reporting Information**: Record and report all information accurately and honestly. No Representative will sign or submit, or permit others to sign or submit on behalf of us or the Supplier, any document or statement that he or she knows or has reason to believe is false. All records and reports shall be created, retained and disposed of in accordance with applicable legal and regulatory requirements.
- **Press/Publicity**: Not speak to the press on our behalf or publicly disclose our name, logo, products, parts, designs, relationships, or any other non-public information without our prior written authorization.
- **Insider Trading**: Not buy or sell our or another company's securities when in possession of information about us or another company that is not available to the investing public and that could influence an investor's decision to buy or sell such security.
- **Anti-Counterfeiting**: Develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into our products.

HUMAN RIGHTS, LABOR, AND EMPLOYMENT

Our Suppliers must honor human rights and equal opportunity in the workplace and shall, without limitation:

- **Non-Discrimination**: Maintain human dignity and respect and a work place that is free from discrimination and harassment based on race, color, creed, religion, sex, age, disability, national origin, ancestry, citizenship, armed forces service, marital or veteran status, sexual orientation, gender identity or expression, or other status protected under applicable laws.
- **Child Labor and Young Workers**: Not use child labor and shall comply with all applicable child labor laws.
- **Forced, Involuntary Labor, and Human Trafficking**: Not support, promote or use compulsory labor, slavery, forced or involuntary labor, or human trafficking of any kind.
- **Safe Working Environment**: Not engage in physical discipline or abuse or the threat thereof or other forms of physical coercion or harassment.
- **Immigration Laws and Proper Documentation**: Will employ or use only workers who have a legal right to work in the jurisdiction in which the supplier intends to hire such employees.

Our Suppliers shall review appropriate and relevant documentation and ensure the legal status of prospective employees prior to hiring such employee.

- Wages and Benefits: Comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates, and proper classification, and provide legally required benefits.
- Working Hours: Not exceed maximum hours of work prescribed by law and will ensure that overtime is paid in accordance with local laws and regulations.
- Freedom of Association: Comply with all laws regarding the rights of employees to associate or not associate with any legally constituted group (e.g. a union or works council).

HEALTH, SAFETY, AND ENVIRONMENT

Our Suppliers must ensure the health and safety of their workplace and of the environment and shall, without limitation:

- Environment: Comply with all applicable laws, regulations, standards, ordinances, rules, permits, license approvals and orders regarding the environment and the use of restricted substances. Our Suppliers shall obtain, maintain and keep current all required environmental permits, licenses, registrations and approvals as well as any operational reporting requirements as identified in the laws, regulations, standards, ordinances, etc. of the country in which the facility is located.
- Hazardous And Restricted Substances: Comply with all applicable environmental laws and regulations regarding waste, hazardous or toxic materials and identify and disclose to us all chemicals in products that are regulated by governments and other authorities in the applicable countries/regions where they are being used.
- Work Environment: Provide a safe and healthy working environment and comply with all applicable health and safety laws, including, where appropriate, addressing occupational injury and illness, emergency preparedness, and occupational safety.
- Facility Security: Maintain adequate security at Supplier facilities at all times. Additionally, Suppliers and their Representatives must comply with our security procedures when at our facilities.
- Conflict Minerals: Take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in any countries identified in any law or regulation governing conflict minerals. Additionally, our Suppliers shall support our obligation to report data related to the existence of conflict minerals in our products.

INTELLECTUAL PROPERTY AND DATA

Our Suppliers must protect our intellectual property, shared data, and information systems and shall, without limitation:

- Intellectual Property: Respect our intellectual property ownership rights and the rights of others, observe and respect all patents, trademarks, and copyrights, and comply with all requirements and terms of their use. Our Suppliers will not, without our express consent,

disclose to others nor use for their own purposes or the purpose of others any of our trade secrets, confidential and proprietary information, knowledge, designs, data, skill, or any other information considered by us as “confidential.” Our Suppliers will not provide us with the confidential information of third parties, unless consent has been obtained from such third parties.

- **Data Privacy:** Process all personal information fairly and lawfully and in accordance with all data protection and privacy laws applicable to such personal information. Our Suppliers shall adopt adequate technical and organizational measures necessary to secure personal information and to prevent unauthorized access, alteration or loss.
- **Information Systems Security and Use:** Comply with our requirements and procedures for maintaining passwords, confidentiality and security as a condition of providing us with products or services or receiving access to our internal systems, network and facilities. Our provided technology shall only be used for authorized business-related purposes. Our Suppliers and their Representatives shall not knowingly download, view or send materials of a discriminatory, harassing, threatening, sexual, pornographic, racist, sexist, defamatory or otherwise offensive nature.

COMPLIANCE PROGRAM

Our Suppliers must have a management system designed to ensure compliance with this Code and applicable laws and regulations, identify and mitigate related operational risks, and facilitate continuous improvement. Our Suppliers, in compliance with local and national laws and regulations, shall also provide a complaint mechanism, free of threat of reprisal, intimidation or harassment, for workers and Representatives to report workplace grievances and violations of this Code. Our Suppliers shall investigate all complaints and take corrective action if needed.

COMPLIANCE WITH CODE AND TERMINATION FOR NON-COMPLIANCE

It is the responsibility of our Suppliers to ensure that their Representatives understand and comply with this Code, and we expect our Suppliers to self-monitor their compliance with this Code. In addition to any other rights we may have under our agreement with our Suppliers, if we determine or believe that at any time a Supplier or their Representatives have failed to comply with the standards set forth in this Code, then we have the right to cease our relationship with that Supplier without notice and without liability or obligation of any sort accruing to us.

REPORTING OF VIOLATIONS

Any violation of this Code shall be promptly reported to us. Violations can be reported through the Stryker Ethics Hotline which can be accessed as follows:

- Website: “Contact Us” section of www.stryker.com
- Phone: 1-866-263-1439
Specific dialing information for non-U.S. locations is available on our Website
- E-mail: ethicshotline@stryker.com

QUESTIONS REGARDING THE SUPPLIER CODE OF CONDUCT

Questions concerning this Code should be directed to your Stryker contact or an individual in our Compliance or Legal departments.