

Corporate Policy 10

Ethics Hotline

Purpose

The purpose of this Policy is to explain the procedures and guidelines related to the reporting of complaints and handling of investigations through the Ethics Hotline.

Scope

This Policy applies to all Stryker employees at all locations. If any provision of this Policy does not comply with local law applicable to a particular Stryker business unit, that business unit may implement an appendix to this Policy to comply with local law, provided that the appendix will conform with the principles contained within this Policy, as determined by the chief compliance officer and general counsel or deputy general counsel. Where a local appendix has not been implemented, all provisions of this Policy that comply with local law will remain in effect.

Basic policies

1. Conduct

- 1.1. Stryker has policies on the reporting by employees of improper, unethical or illegal conduct or activity, which can be found in Stryker's Code of Conduct and other company policies, all of which are posted on the Stryker internet site and the Stryker corporate intranet.
- 1.2. Employees are required to report to management any suspected or known improper conduct or activity that may give rise to legal or ethical problems or violate applicable laws or company policies. Such conduct or activity 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 U.S. Securities and Exchange Commission ("SEC") or any other law relating to fraud against stockholders and violations of any other laws.

2. **Ethics Hotline:** Stryker has an Ethics Hotline to provide employees and non-employees with multiple avenues to raise concerns or allegations of non-compliance in a confidential manner and, if desired, anonymously. All reports submitted to the Ethics Hotline are routed to the appropriate persons within Stryker, who are responsible for ensuring that each report is handled in a professional and confidential manner.

3. **Ethics Hotline committee:** This Policy is administered by the Ethics Hotline committee (the "committee"), consisting of, at a minimum, the general counsel, the vice president and chief human resources officer, the vice president internal audit, and the chief compliance officer. The committee is responsible for administering the Ethics Hotline. Members of the committee and their designees have access to the Ethics Hotline and reports.

4. Reporting

- 4.1. Employees are required to report any suspected or known improper conduct or activity that may give rise to legal or ethical problems or violate applicable laws or company policies.
- 4.2. An employee may report such conduct or activity to the employee's immediate supervisor, to appropriate members of the Human Resources, Legal and Compliance functions at the employee's location, to the president or executive in charge of the applicable business unit ("executive in charge") or to the chief executive officer, chief financial officer, general counsel, vice president and chief human resources officer, vice president internal audit, or chief compliance officer of Stryker as set forth in Stryker's Code of Conduct.
- 4.3. Any manager or other Stryker personnel who receives a report of such conduct or activity must bring this report immediately to the attention of the Compliance or Legal functions or to the committee.
- 4.4. If an employee is uncomfortable reporting any suspected or known improper, unethical or illegal conduct or activity in such manner, the employee may report such conduct or activity through the Ethics Hotline.
- 4.5. All matters, regardless of intake method, will be entered and tracked in the Ethics Hotline.
- 4.6. The committee will meet regularly to review all Ethics Hotline matters including their status or disposition. The chief compliance officer will report regarding Ethics Hotline matters to the relevant committee of Stryker's Board of Directors.

5. Non-retaliation

5.1. Stryker's policies expressly prohibit any form of retaliation against employees who:

- In good faith and for lawful purposes report, cause to be reported, or assist in the investigation of any suspected or known improper conduct or activity that may give rise to legal or ethical problems or violate applicable laws or company policies by anyone at Stryker.
- 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.
- File, cause to be filed, assist, participate, or give testimony in any proceedings filed or about to be filed related to such conduct.

5.2. Stryker 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.

5.3. 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 appropriate leadership of the Human Resources, Legal and Compliance functions, to the executive in charge, or a member of the committee or through the Ethics Hotline.

6. Investigations

6.1. Once an employee reports suspected or known improper conduct or an activity that may give rise to legal or ethical problems or violate applicable laws or company policies or retaliation identified in this Policy, Stryker 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.

6.2. All investigations will be handled confidentially, to the extent possible and appropriate under the circumstances, in light of the privacy interests of all concerned. Stryker will endeavor to deal with all employee disclosures and complete any and all related investigations conducted under this Policy in a timely manner.