

GLOBAL CODE OF CONDUCT



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Our History

It all began in 1980 on a simple drafting table in the Olympic Village in Munich, Germany. Inspired by his work with surgeons, President and Founder Reinhold Schmieding anticipated that arthroscopy might revolutionize sports medicine and orthopedics, and he founded a small start-up company to pioneer this new technology. His vision was to make it possible for surgeons to treat joint injuries and arthritis by means of minimally invasive arthroscopic techniques.

From the beginning, Arthrex has been dedicated to providing surgeons with uncompromising support. Our **innovation** stems from collaborative partnerships with surgeons, listening to their needs and providing the scientific foundation and validation for developing safe and effective minimally invasive surgical procedures.

One of Arthrex's earliest initiatives was providing opportunities for surgeons to develop their surgical skills. We continue this tradition of **training and educating surgeons** through a comprehensive global medical education program. Our unwavering commitment to **quality standards and clinical results** has allowed our company to build and maintain customer **trust** and has always been the driving force in how we conduct business – with a true commitment to our mission of **Helping Surgeons Treat Their Patients Better™**.

Arthrex has always been steadfast in its **commitment to integrity**, driven by principles that rise above material pursuit. This distinguishing value has been embraced by decades of **loyal and dedicated employees** and has rewarded our company with the kind of growth and success that can only come from building trust in our reputation and brand.





A Message From Our President and Founder

Our core value of Making People Better is the heart and soul of Arthrex. I founded this company with the mission to develop innovative arthroscopic products to help surgeons improve patients' lives. This is the foundation of our business. But Arthrex is not just about making patients better. Arthrex would not be where it is today without its employees, and it's just as important to me to create a company where we are all proud to work. Every aspect of what we do is committed to improving the lives of the people around us, whether it be patients, each other, or our communities.

As a company that operates in a highly regulated industry, we will inevitably be required to navigate challenging situations involving complex business processes, standards, and regulations. Our Code of Conduct is a guide for our employees to help resolve tough questions as they arise. It embodies and reinforces our core value, including our commitment to patients, our Arthrex family, and our communities. Our Code includes a set of principles beyond compromise. These principles are a part of our heritage and our future.

Each of you has an important impact on the results of our success. You are proof that dedication, integrity and loyalty are the essence of the Arthrex family. We have never had to compromise our ethics and integrity to grow this business, and that is a legacy I expect all of us to continue. We thank you for being a part of the Arthrex family, and encourage you to be an active participant in our enduring objective to ensure that medical decisions are based on the best interest of the patient and that we do all we can in **Helping Surgeons Treat Their Patients Better™**.

Sincerely,

Reinhold Schmieding

Our Mission and Core Value

Arthrex was founded with the purpose of *Helping Surgeons Treat Their Patients Better™*. This is our mission statement and it influences every aspect of how we do business.

In pursuit of our mission, it is important to remember that Arthrex does not just impact surgeons. We have a direct impact on people all around us — patients, the Arthrex family and our communities. Because of this, we must always keep in mind that which motivates us: our core value of *Making People Better*. No matter the context, we never compromise this core value.





Making Patients Better

We achieve this by . . .

- Delivering high-quality products and technologies
- Providing health care professionals with quality medical education on safe and effective treatments and technologies
- Leading the industry in researching and developing innovative new products and technologies, and staying ahead of the competition by engaging in fair business practices



Making Our Arthrex Family Better

We achieve this by . . .

- Conducting business with integrity and promoting pride and confidence in Arthrex through ethical interactions with health care professionals and government officials, and by selecting business partners who adhere to the same high standards of business conduct
- Protecting the confidential, personal and sensitive data with which we are entrusted
- Fostering diversity, inclusion, and teamwork and creating a respectful, safe, and harassment-free workplace



Making Our Communities Better

We achieve this by . . .

- Observing the laws, regulations and industry codes in the communities where we conduct business
- Minimizing our environmental footprint and strengthening future resources
- Supporting charitable causes in our communities— locally and globally

Our Core Value in Action

Making People Better requires that we live up to the standards of the Code by demonstrating good judgment in our decisions and actions when conducting business.

Knowing the right decision is not always black and white. If a situation arises where the right choice may not be apparent, take time to consider your options and how they align with our values.

Making Patients Better

Could someone or something be harmed by my decision? Is my conduct taking into account what is in the best interest of patients?

Making Our Arthrex Family Better

Am I making a decision in the best interests of Arthrex? Am I modeling good behavior?

Making Our Communities Better

Does my decision comply with all applicable laws, regulations and industry codes? Am I making things better for my community?

Always ask yourself if you are working with the right people and consulting the right resources.

If you need additional guidance outside of this Code, reach out to Risk Management & Compliance through the Ethics Helpline found under the “Ethics Helpline” tab on the Arthrex website or via email at

AskCompliance@arthrex.com.

Purpose and Scope

The Global Code of Conduct (this Code) is intended to assist Arthrex employees in aligning their actions and decisions with the company’s mission and core value. It sets the tone for how we represent Arthrex. It is more than words written on paper: it is who we are and how we do business.

This Code applies to all Arthrex employees worldwide. In addition, contractual agreements with certain third parties, such as agencies and distributors, require compliance with our Code when acting on Arthrex’s behalf. Violations of this Code could result in disciplinary action up to and including termination.

Expectations

We all have a role in **Making People Better**, whether it be surgeons and patients, each other, the company or our communities. This Code outlines how to best demonstrate commitment to our core value and the principles that guide us in achieving the Arthrex mission.

Employees are expected to be familiar with all laws, regulations and industry codes applicable to their functional area. There are also many policies that impact our day-to-day jobs and we are each expected to understand these requirements. If you have any questions about the obligations under the law or our policies, you should seek guidance from your local management, Human Resources, Legal, or Risk Management & Compliance Departments. If you become aware of any questionable activity or potential violation of this Code, you must report it to the Risk Management & Compliance Department.

Speaking Up

We can only be better if we understand where we need to improve. Reporting suspected violations of this Code benefits Arthrex and elevates the expected behavior of all employees. All Arthrex employees and those acting on the company’s behalf, are obligated to speak up with their questions and concerns, and to report instances of actual or potential noncompliance.

There are many ways in which you can confidentially address questions and concerns, including the following:

- Discuss the issue with your manager or another manager, unless you have reason to be uncomfortable doing so.
- Discuss the issue with a local representative of the Human Resources, Legal, or Risk Management & Compliance Departments.
- Discuss the issue with the Risk Management & Compliance Department at Arthrex, Inc. via AskCompliance@arthrex.com or by sending a written communication marked “Private and Confidential” to the Risk Management & Compliance Department at Arthrex, 1370 Creekside Boulevard, Naples, Florida 34108-1945.
- Use the confidential Ethics Helpline to report via phone or the web-reporting tool, both of which can be accessed from the tab labeled “Ethics Helpline” on the Arthrex website. The Ethics Helpline resources are available in many languages and accessible 24 hours a day, seven days a week.

Employees are expected to fully cooperate (i.e., truthfully and completely) with all requests for information and investigations. This includes but is not limited to preserving and providing data or documentation, and participating in interviews. Any form of retaliation against any employee for good faith reporting or for participating in the investigation of a suspected violation will not be tolerated. No employee will be criticized or disciplined by the company for any loss of business resulting from legitimate adherence to this Code.

🔗 Navigate to our [Global Speak-Up Policy](#).



Making Patients Better

At Arthrex, patients are at the core of our mission of **Helping Surgeons Treat Their Patients Better™** and our patient-focused culture is vital to our success. We are committed to developing and providing surgeons with innovative, high-quality products and technologies that improve clinical care and the patient experience.

Arthrex is committed to creating innovative products that are effective, and improve patient care and the patient experience.

What does anticompetitive behavior look like?

- Making inappropriate or clinically unsubstantiated product comparisons
- Making misleading claims regarding product safety, efficacy and outcomes
- Disseminating biased information or omitting adverse clinical data
- Agreeing with competitors to fix prices, rig a bid or divide a market

Deliver High-Quality Products

At the heart of Making Patients Better is ensuring that the products and technologies we manufacture and deliver are effective and of the highest quality. This principle has always been at the center of how we produce medical devices, starting with the selection of the highest quality materials and continuing through manufacturing. To continue this tradition, employees are expected to comply with all applicable legal, regulatory and Quality Management System requirements. Management should be promptly notified of any concerns regarding the quality of our products.

Provide Medical Training and Education

Part of delivering quality products to patients is ensuring that surgeons are trained and educated on the safe and effective use of our products and technologies. We support surgeons in providing the best care to their patients through medical education presentations, surgeon observation programs, and training at our labs. We also provide medical training and education necessary to help ensure that health care professionals safely and effectively use Arthrex products and therapies, as approved by the FDA or other applicable regulatory bodies.

Promote Products and Technologies Honestly and Through Fair Competition

Arthrex was created from the innovative spirit of our president and founder, and we strive to lead our industry through continuously improving existing products and developing new products and technologies. Our products speak for themselves, therefore we do not need to engage in dishonest or anticompetitive business practices to gain a competitive advantage. Arthrex is committed to promoting its products in a lawful and accurate manner by providing truthful and non-misleading information. We only promote our products and technologies for their intended use as approved by the appropriate regulatory agencies.

In addition to honest promotion, Arthrex does not unfairly undermine the products or services of a competitor, or use any unfair advantage, such as manipulation, concealment, abuse of privileged information or misrepresentation of facts to promote our products. Likewise, we do not conduct business in a manner that restrains trade or monopolizes the markets where we do business. Engaging in such behaviors may not only be anticompetitive, these behaviors may also cause surgeons to make decisions that are not in the best interest of patients.

Employees are expected to be familiar with the approved uses for our products, as well as the antitrust and competition laws that apply in their country.



Making Our Arthrex Family Better

Arthrex started from a small group of dedicated employees who were like family. It is the dedication and teamwork of our employees and third parties that made Arthrex the company it is and built the reputation it has today. Although we have grown exponentially, we maintain a family business culture and we consider third parties who conduct business on behalf of Arthrex to be like our extended family. Every member of the Arthrex family is responsible for making Arthrex a place we are all proud to work for and do business with.

Our reputation and Arthrex family members are our greatest assets, and we are committed to conducting business in a manner that fosters trust and pride in Arthrex.





Act With Integrity

Building and maintaining trust in the Arthrex family is how our success began, and it is critical to our continued growth. Conducting business in a manner that reflects the highest standards of business conduct, and acting as law-abiding, responsible corporate citizens is essential to enhancing and maintaining the trust of our patients, customers, and business partners. All Arthrex family members are expected to act with integrity and prevent the misuse of company assets.

We never offer gifts, entertainment, improper payments, medical education or discounts to inappropriately induce or retain customers. All interactions with health care professionals and government or foreign officials must be for legitimate business purposes. Bribes, inducements, facilitating payments and other such inappropriate business interactions are strictly prohibited. Not only are these types of activities prohibited by law, they could also result in unsafe use of our products, causing harm to patients.

Representatives and business partners are selected with great care and are held to the same standards to which we hold ourselves when conducting business. If your work involves selecting or managing third parties, conduct the appropriate due diligence. The Legal and Risk Management & Compliance Departments are here to assist you in the appropriate engagement of our business partners and third parties.

🔗 Navigate to our global policies on [Interactions with HCPs/HCOs and Government Officials](#) and [Anti-Corruption](#).

Q&A

Q: A new 5-star restaurant opened up in town and one of my customers has mentioned really wanting to try it. I was able to get a highly coveted reservation for the chef's table with a 6-course tasting menu. Can I bring my customer and her husband?

A: While your customer would likely jump at the opportunity, inviting her and her husband for an extravagant, lavish meal may be seen as an inducement for your customer's continued business or for additional business.

Remember, treating your customer to a modest meal is typically fine, if conducted in a setting that is conducive to discussing legitimate business. Customers' spouses, family members and staff members who do not have a legitimate business interest are prohibited from participating in such events.



Place Arthrex's Interests Above Personal Interests

Developing strong third-party relationships is an important part of Arthrex's history, as well as our future. However, these relationships never come before doing what is best for patients and the company. Having personal business interests involving our vendors, suppliers, customers, business partners, or competitors that may potentially interfere with your obligation to devote your time and attention to your job responsibilities can result in a conflict of interest. Conflicts of interest can occur anytime your personal interests might benefit from your actions or influence as an Arthrex employee. Employees are obligated to disclose any potential conflicts to their managers, consistent with local laws and applicable policies. Disclosure must be made before becoming involved in or acquiring a financial interest in an outside business, and employees are to take actions necessary to resolve any potential conflicts when Disclosure must be made before becoming involved in or acquiring a financial interest in an outside business, and employees are to take actions necessary to resolve any identified conflicts of interest.

🔗 Navigate to our [Global Policy on Conflicts of Interest](#).

Q&A

Q: My sister-in-law owns the catering vendor we are thinking of hiring. I am part of the group making the decision. Is there anything different I should do in handling this?

A: You should disclose your relationship to your supervisor immediately as this could create a conflict of interest or the appearance of one. You should also remove yourself from the decision-making process.

Remember, just because you make a disclosure does not mean the relationship or interest is prohibited, only that extra steps may need to be taken to ensure we conduct our business in a fair and transparent manner.

Protect Company Data, Our People and Our Patients

In today's data-driven world, a vast amount of information is often at our fingertips. Many roles at Arthrex come into contact with varying types of information requiring protection, whether it be confidential or proprietary product information, such as pricing data; personal data of employees, customers, suppliers and patients; or the systems themselves that house the data. Protecting this data is imperative for our future success. Our failure to do so could impact our reputation, advancement of our products and technologies and the safety of our employees and patients.

Employees must maintain confidentiality with respect to all confidential and proprietary information regarding or relating to our business. Employees must also maintain the privacy and security of personal data, including employee, customer, supplier and patient information. Failing to do so could bring harm to our employees, patients and the company.

Arthrex information technology systems are to be used only for company business and employees are expected to take reasonable measures to secure these systems.

If you have questions on what is required based on your geographic location and about transferring data, reach out to Risk Management & Compliance.

🔗 Navigate to our [Global Policy on Data Protection](#) and to our [Acceptable Use of Assets Policy](#).

What must I protect?

■ Confidential information

Includes all proprietary or confidential information regarding or relating to our business, such as Arthrex intellectual property, business plans or projects, and business partners' contact information. This also includes other confidential or privileged information, such as information related to internal investigations or attorney-client privileged communications.

■ Personal Data

Includes individual employee, customer, supplier or patient personal data (e.g., home address, salary, personal identification numbers, such as Social Security numbers) and sensitive personal data, such as protected health information of employees and patients.

■ Arthrex Systems and Technologies

Includes desktop, laptop and slate or net book computers; servers and network devices; wired and wireless phones, PDAs, cellphones; removable media such as USB sticks, jump/flash drives, or external hard drives; computer peripherals, such as printers, scanners, wireless modem cards, fax machines, multi-function (scanner/fax/printer/copier) devices monitors, plasma screens and projectors.

What can I do to make sure data is secure?

- Minimize the use of personal data when possible, limiting it to the minimum necessary
- Keep your user ID and passwords private
- When working with confidential or personal data, lock your computer screen or log out of the applicable system when walking away from your computer
- Do not leave systems or equipment unattended or unsecured when taken offsite or used in the field (e.g., do not leave laptops in vehicles or unattended in an external office)

Q&A

Q: My team just worked on a 3D print of the shoulder of my favorite Olympic swimmer. I can post this on Facebook or Twitter, as long as I do not include a picture of the 3D image, right?

A: No, this would still be considered an unauthorized disclosure of personal data, including protected health information that is prohibited by data protection and privacy laws.

Remember, it is always a good idea to limit work-related posts on social media and to refer to our policies on the appropriate use of social media before posting.



Foster Diversity and Inclusion

Creative and different ways of thinking and problem-solving, along with the diverse backgrounds of our employees, are behind the success of our company. Arthrex recruits, hires and promotes employees based on the qualifications, experiences and abilities necessary to perform the work required. We are committed to providing equal opportunities for all employees regardless of race, national origin, color, religion, religious creed, age, sex, gender identity, sexual orientation, marital status, medical condition, physical or mental disability, military service, pregnancy or childbirth, and related medical conditions.

Arthrex does not tolerate discrimination in any form. As a global company, we should be particularly sensitive to actions that may be acceptable in one culture but not another. Treat others with respect.



Create a Safe and Productive Work Environment

Our Arthrex family is important to us, and we are committed to providing the best possible work environment for our employees and ensuring a safe, secure, healthy and productive work environment. This includes maintaining an alcohol and drug-free workplace.

Central to making our Arthrex family better is creating a safe and collaborative workplace where our employees feel valued and empowered to achieve their professional goals. This can only happen in a workplace free of intimidation, threats or acts of violence. We do not tolerate discrimination or harassment in any form, neither toward or by, job applicants, employees, customers, guests or any third party. We are all responsible for creating and maintaining an environment where everyone feels welcome and free of any form of harassment or discrimination, including sexual harassment.

Employees must report any injuries, threats to product or human safety, or any situations that violate this Code to their manager, Human Resources, Environmental Health & Safety, Risk Management & Compliance, or Legal immediately.

Q&A

Q: My supervisor has been circulating a joke via email that I think others might find offensive and inappropriate. I'm worried that if I mention it to him, it will impact my performance review. What should I do?

A: You should always report any behavior that seems harassing, inappropriate or violates this Code. If you do not feel comfortable talking to your supervisor directly, you should report this to another internal resource, such as Human Resources or Risk Management & Compliance.

Remember, Arthrex has a strict policy on nonretaliation for good faith reporting of violations of our policies and this Code.

Making Our Communities Better

Part of our core value of **Making People Better** includes an awareness of how we impact our communities, both locally and globally. At Arthrex, we are committed to driving positive change for our neighbors and communities across the globe.

We are committed to creating and delivering medical technologies in a way that advances health and also secures the future of our company, our communities and our planet.





Act as a Responsible Global Citizen

We strive to be good corporate and global citizens by representing Arthrex in our interactions with local, state, national, and international governments and other organizations in a legal, ethical, and professional manner. We respect the laws and regulations in the global communities in which we conduct business.

All countries regulate international trade transactions (e.g., imports, exports and international financial transactions) for national security and foreign policy purposes. We comply with international trade control regulations regarding licensing, shipping documentation, import and export documentation, reporting and record-retention requirements in all countries in which we conduct business.

Arthrex is mindful of the effect that our corporate activity has on the earth, and we are committed to doing business in an environmentally friendly manner. As part of our social responsibility, we strive to maintain customer satisfaction with the highest quality products developed in an environmentally sustainable way and create a working environment that supports these goals. We are committed to making continuous improvements in our systems and processes that minimize our environmental footprint and strengthen our resources for the future.

We also expect the third parties we engage to be responsible global citizens, and Arthrex only does business with third parties who support and protect human rights in their operations. We must not conduct business with third parties that engage in any form of forced, indentured, slave, or child labor or who treat employees harshly or inhumanely. If you witness or suspect a violation of human rights, speak up.

Support Our Communities, Locally and Globally

Charitable Contributions, Product Donations and Grants

Arthrex is committed to supporting our local and global communities by providing charitable contributions, including support for global projects and product donations that benefit undeveloped and underserved communities in need. Any donation made on behalf of the company must be motivated by a bona fide charitable purpose, and should not be related directly or indirectly to the volume or value of purchases made by, or anticipated from, the recipient or any member of the recipient's organization.

Arthrex also supports many local, national, and international charitable organizations. We encourage employee participation in such organizations and their active involvement in their local community and beyond.

To further support our medical communities through research and development, we also provide research and medical education grants to non-profit charitable and academic institutions. The provision of a medical education or research grant is never related directly or indirectly to the volume or value of purchases made by, or anticipated from, the recipient.

Political Activity

We encourage employees to participate in political activities during personal time. Employees must be clear that these actions and views are their own personal views and are not Arthrex's views nor reflect the views of Arthrex.

🔗 Navigate to our global policy on [Human Rights](#), [Contributions](#) and [Conflicts of Interest](#).





Our Future

It was on a simple drafting table in a tiny apartment in the Olympic Village in Munich where the company name and logo were developed and still stand today. This same drafting table sits at our Global Headquarters in Naples, Florida to remind us where we came from. The distinguishing values and principles driving us today — **Making Patients Better, Making Our Arthrex Family Better, and Making Our Communities Better** — will ensure our success in the future.



www.arthrex.com

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