

Supplier Code of Conduct

Stryker Corporation and its affiliates (collectively, “Stryker”, “we”, “our” or “us”) are 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 with their Representatives “our Suppliers”) that share our commitment to Integrity, Accountability, People and Performance. We understand that, while our Suppliers are independent entities, their actions may impact us and our reputation. This Supplier Code of Conduct (“Code”) is intended to establish expectations for our Suppliers, and their subsidiaries, affiliates, 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 and ethics

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, provincial, national, regional, and trade laws, statutes, acts, ordinances, rules, codes, standards, guidelines and regulations of the jurisdictions where they are doing business (together, “Laws”), 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 jurisdiction 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 will the Supplier or their Representatives request or accept any improper payment from suppliers, customers, or anyone seeking to do business with the Supplier. The term improper means any action that is intended to or creates the appearance of an intent to improperly influence a business decision of that person or secure any improper advantage.
- **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 conflicts of interest, either actual or perceived, that interfere with Stryker’s best interests. Our Suppliers and their Representatives shall not deal directly, in the course of negotiating a supplier agreement or performing their obligations for us, with any of our employees or their spouses, domestic partners, or other family members or relatives who may receive a personal benefit as a result of the Supplier’s work with us.
- **Recording and reporting information:** Record and report all information accurately and honestly. No Supplier Representative will sign or submit (either directly or indirectly on behalf of itself or Stryker) 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 and 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:** Ensure that they do 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.
- **Responsible sourcing:** Exercise due diligence and mitigate potential risks, for any materials and/or suppliers in their supply chain originating from high-risk regions, including those associated with armed conflict, child labor, forced or involuntary labor, human trafficking, gross human rights violations, severe health and safety risks, substantially negative environmental impacts or other similar, reasonably objective, high-risk activities.

Human rights, labor and employment

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

- **Non-discrimination:** Maintain a workplace 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:** Prohibit use of child labor and shall comply with all applicable child labor laws, including those addressing limitations on age and types of permissible work.
- **Forced labor, involuntary labor and human trafficking:** Prohibit any support, promotion or use of compulsory labor, slavery, forced or involuntary labor, or human trafficking of any kind.
- **Freedom of movement:** Prohibit any unreasonable restrictions on the ability of employees to leave the workplace or to terminate employment, including holding original copies of employee identification documents (passports or other identity papers).
- **Safe working environment:** Prohibit use of physical discipline or abuse or the threat thereof or other forms of physical coercion or harassment.
- **Immigration laws and proper documentation:** Employ or use only workers who have or will obtain 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 employees.
- **Recruitment fees:** Not require workers to pay recruitment fees, either directly or through third parties, as a condition of obtaining or sustaining their employment with the Supplier.
- **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. In addition, our Suppliers shall not use unlawful deductions from wages for hours worked as a disciplinary measure.
- **Employment information:** Provide employees with clear information about wages, benefits, working hours and other terms and conditions of employment.
- **Working hours:** Comply with all Laws regarding maximum working hours per week. Where overtime is required, our Suppliers shall clearly communicate such requirements.
- **Freedom of association:** Comply with all Laws regarding the rights of employees to associate or not associate with any legally constituted group.

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 Laws 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, rules, codes, standards, guidelines and regulations of the jurisdiction in which the facility is located. Where possible, our Suppliers should identify and implement responsible and sustainable practices to reduce the environmental impact of operations, including a focus on reducing carbon emissions.
- **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 a government or other authority in the applicable jurisdiction where they are being used. Our Suppliers should make efforts to decrease the use of hazardous or toxic materials including, where possible, implementation of focused reduction initiatives and use of less hazardous alternatives.
- **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, our Suppliers and their Representatives must comply with our security procedures when at our facilities.

Intellectual property and data

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

- **Intellectual property:** Respect Stryker's rights in intellectual property, including patents, trade secrets, trademarks, copyrights and equivalent rights, and comply with Stryker's requirements governing 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 intellectual property, or confidential or proprietary information. Our confidential information may include (but is not limited to) financial and sales information, technical and product information (including samples), business, research and regulatory information. Our Suppliers will not provide us with the confidential information of third parties, without first obtaining appropriate consent from the relevant third party.
- **Data privacy:** Process all personal information in accordance with all applicable data protection and privacy laws. Our Suppliers shall respect the privacy of individual's personal information and 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, [Acceptable Use Policy](#) 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, networks or facilities. Our provided technology shall only be used for authorized business-related purposes. All use of information systems must comply with Stryker's Corporate Policies, including our Anti-Discrimination and Sexual and Other Harassment Policies and our Code of Conduct.

Management systems

Our Suppliers must have a management system designed to ensure compliance with this Code and all Laws, identify and mitigate related operational risks, and facilitate continuous improvement. Our Suppliers 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 in a timely fashion, promptly remedy any violations of this Code and implement appropriate corrective and preventative action if needed.

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. Stryker may engage in monitoring activities to confirm Supplier compliance with this Code and work with our Suppliers on continuous improvement in any identified compliance gaps. 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

Any violation of this Code shall be promptly reported to us. Violations can be reported through Stryker's Ethics Hotline which can be accessed at www.ethicshotline.stryker.com.

Additional information

For additional information around Stryker's corporate policies please visit the "Corporate governance" page in the "About" section of www.stryker.com or [here](#).