

Zimmer Biomet Code of Business Conduct and Ethics



ZIMMER BIOMET
Your progress. Our promise.™

Your progress. Our promise.™

At Zimmer Biomet,
we don't just make medical devices,
we help millions of people
live better lives.



Our Purpose

Restore mobility, alleviate pain and improve the quality of life for patients around the world.

Our Mission

Lead the industry in delivering value to healthcare providers, patients and stockholders, while embracing our broader social responsibilities.

Our Values



Customers First

We actively pursue ways to earn trust and exceed expectations in every Customer interaction.



Do the Right Thing

We hold ourselves to the highest standard of quality and integrity in everything we do.



Win Through Results

We are accountable for delivering on our commitments and recognize that success requires a winning attitude, discipline and a sense of urgency.



Innovate and Improve

We are driven to develop innovative solutions that make a difference and to continuously improve performance.



Positive Culture

We are optimistic, curious and committed in our interactions with others.



One Zimmer Biomet

We collaborate for the greater good in a global company that is united by Our Purpose.

A Message from Our President & CEO

Dear Team Member,

Zimmer Biomet was created from the combination of two global leaders in musculoskeletal healthcare that the world respects and trusts. By coming together, we help all Zimmer Biomet stakeholders—patients, healthcare professionals, Team Members and the communities in which we operate—redefine what is possible and progress to the next level. Simply put, we are in the business of changing people’s lives. We are humbled by that fact and take our responsibility seriously.

Because of this, the way we conduct our business is critically important. The *Zimmer Biomet Code of Business Conduct and Ethics* was established to reflect our shared values and help guide our approach to our work. Each and every one of us, regardless of our position, business unit or geography, has a responsibility to read the Code and to follow its principles in our everyday behavior. That means we will comply with all applicable laws and regulations, adhere to the highest ethical standards and act as a responsible member of our communities.

I encourage you to ask questions if you have a concern or are unsure of what to do in a specific circumstance. It is always better to ask if you have any doubts about any course of conduct. Contact your manager or refer to the resources within this document.

Thank you for taking time to read and understand the Code. In conducting yourself according to its principles, you are helping make Zimmer Biomet the most respected company in the industry.



Sincerely,

A handwritten signature in black ink that reads "David C. Dvorak". The signature is written in a cursive, flowing style.

David C. Dvorak
President and Chief Executive Officer

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Introduction

Zimmer Biomet has an important role as a worldwide leader in the musculoskeletal healthcare industry. We are dedicated to restoring mobility, alleviating pain and improving the quality of life for patients around the world.

The *Zimmer Biomet Code of Business Conduct and Ethics* (the “Code”) reflects our shared values and serves as the foundation for the Zimmer Biomet policies and procedures. The Code applies to Zimmer Biomet Holdings, Inc., its subsidiaries and affiliates and all of its officers, directors and employees (including full-time, part-time, temporary and contract employees) worldwide (collectively, “Team Members”).

Zimmer Biomet also expects its distributors, sales agents and other third-party agents and representatives to follow the Code when acting on our behalf or for our benefit (collectively, “Business Partners”). It is important for all Team Members and Business Partners to read, understand and follow the Code.

The Importance of Asking Questions

If you are unsure whether a certain activity would comply with the Code, ask yourself:

“Would this activity reflect positively on Zimmer Biomet?”

“Would I be comfortable if this activity became publicly known?”

If the answer is “no” or “I don’t know” to either of these questions, please ask for guidance from your manager or from Zimmer Biomet Compliance, Legal or Human Resources.

Your commitment to the core principles and ethical standards outlined in the Code will ensure Zimmer Biomet continues to act as a trusted leader in the industry.

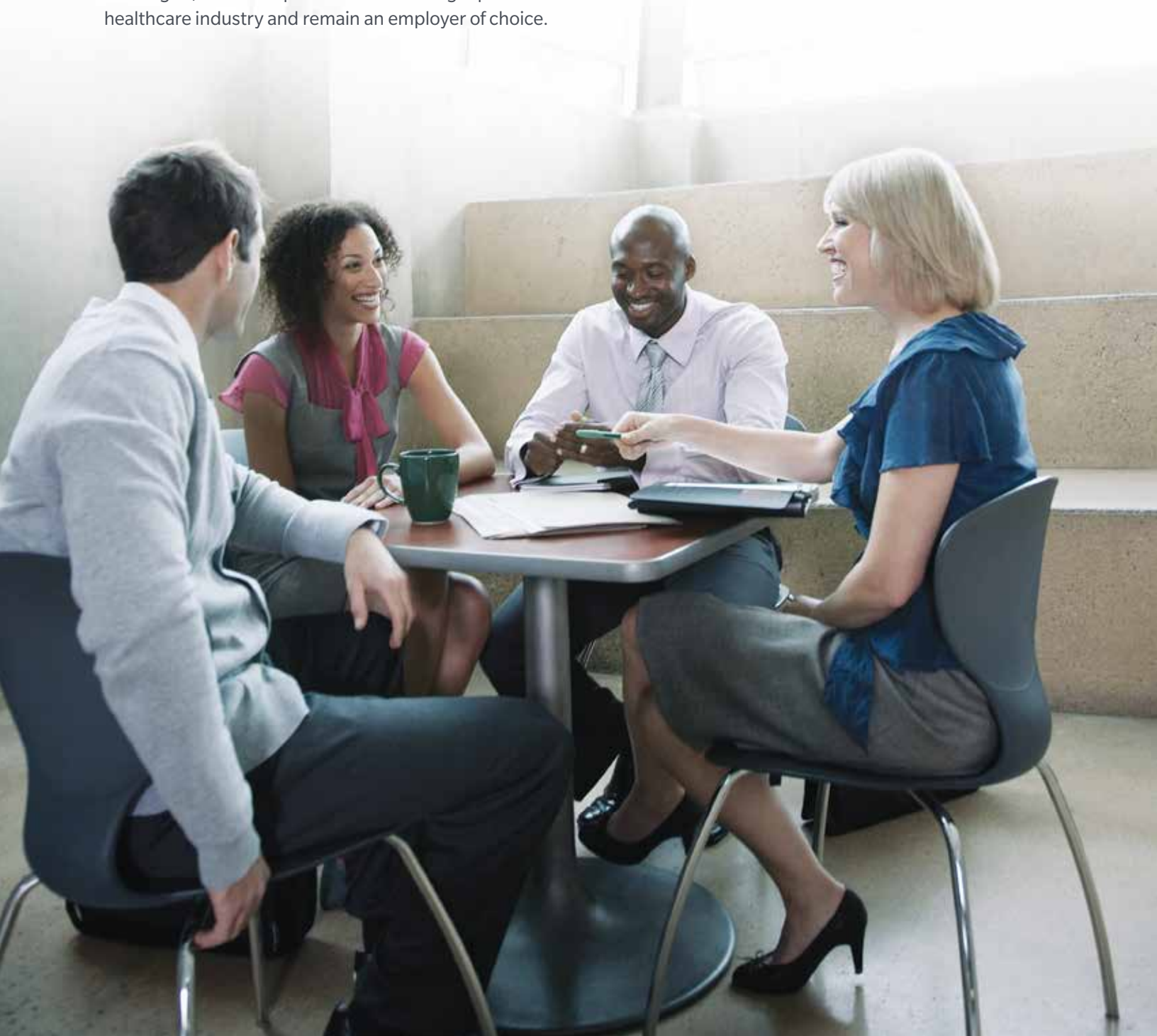
To report a known or suspected issue, contact +1.877.593.4582 (Zimmer) or +1.888.469.1566 (Biomet).

Section 1

Commitment to Our Team Members

Our Team Members are our most important asset.

To create a culture of respect at Zimmer Biomet, we work hard to maintain open lines of communication internally so that Team Members have a better understanding of our business and mission, and can move forward with a winning attitude, discipline and a sense of urgency. We are committed to complying with all laws for a healthy, safe, fair and harassment-free workplace. In doing so, we will help maintain our strong reputation in the musculoskeletal healthcare industry and remain an employer of choice.



Section 1

Commitment to Our Team Members



Hiring and Development

We are dedicated to attracting and retaining the best talent and helping people achieve their full potential. We hire, compensate and promote based on qualifications, experience and skills. We provide Team Members with the necessary support and training to meet their identified goals. We review our Team Members' performance periodically for compensation, promotion and retention decisions to ensure that mutual expectations are met.

Zimmer Biomet also provides opportunities for Team Member growth and development through continuing education. We encourage you to speak to your manager or supervisor about your specific opportunities.

We promote a fair and competitive work environment. Zimmer Biomet complies with wage and hour laws. Managers and supervisors must ensure their Team Members follow these laws and adjust workloads to individual Team Member's capacities.

Zimmer Biomet is committed to respecting the human rights, dignity and privacy of the individual. We follow applicable labor laws and do not allow child labor, forced labor or trafficking by Zimmer Biomet or its Business Partners. Zimmer Biomet respects the rights of our Team Members to freedom of association, freedom of expression and the right to be heard.

Diversity in the Workplace

Diversity is much more than a category of persons; it is about embracing those individuals' ideas and thinking. This is what will continue to drive our success in the future.

Zimmer Biomet respects and welcomes diversity among its Team Members. We are committed to providing equal employment opportunities for all of our Team Members without regard to race, color, creed, religion, national origin, citizenship, gender, gender identity, sexual orientation, marital status, pregnancy, age, medical condition, disability or military or veteran status.

**We are committed
to providing equal
employment
opportunities for all
of our Team Members.**

Section 1

Commitment to Our Team Members



Conduct in the Workplace and Workplace Harassment

Our Team Members are fundamental to our success. Zimmer Biomet values and appreciates each Team Member's individual diversity and unique contributions. We will not tolerate discrimination or harassment of any kind, including any unwelcome or unwanted attention or discriminatory conduct based on an individual's race, color, creed, religion, national origin, citizenship, gender, gender identity, sexual orientation, marital status, pregnancy, age, medical condition, disability or military or veteran status.

Harassment can include verbal, non-verbal, physical or sexual conduct. What one individual may think is harmless may be perceived by another individual as harassing, hostile, intimidating or humiliating. Remember: intention and perception may vary. It is not the intent that is relevant to what is considered an act of harassment; instead, it is the perception of the person who is targeted by the activity that is relevant. In daily work activities and interactions with others, Team Members should act with respect, courtesy and consideration. Team Members should not engage in:

- **Racial, religious or other stereotyping;**
- **Derogatory jokes or gestures;**
- **Physical or verbal conduct of a sexual, racist or defamatory nature;**
- **Intimidating or aggressive acts;**
- **Inappropriate humor; or**
- **Communicating or displaying offensive material in the workplace.**

As Team Members, we each have a role to play in the creation of a positive work environment. Our managers and supervisors are vital in establishing a culture of appreciation, respect, fairness and trust that contributes to our Team Members' physical and emotional well-being. Managers and supervisors also set an example for Team Members through their verbal and non-verbal behavior. Similarly, Team Members should always support and help each other and consider their own verbal and non-verbal behavior.

If workplace harassment occurs, Team Members should report incidents as soon as possible to their manager, supervisor or Zimmer Biomet Human Resources.

We will not tolerate discrimination or harassment of any kind.

As Team Members, we each have a role to play in the creation of a positive work environment.

Section 1

Commitment to Our Team Members



Health, Safety and Environment

Zimmer Biomet is committed to protecting the health and safety of its Customers, Team Members, the public and the environment.

Zimmer Biomet is dedicated to providing its Team Members with a safe and healthy workplace. Team Members have a shared responsibility to maintain such a workplace by following Zimmer Biomet's health and safety rules and practices. These include reporting accidents, injuries and unsafe equipment, practices or conditions.

Regardless of the situation, certain behaviors are unacceptable. Violence and threatening behavior will not be tolerated. The use, possession, manufacture, sale or distribution of drugs is prohibited on company premises and/or on the job. Zimmer Biomet expects Team Members to report for work in a condition to perform their duties unimpaired by drugs or alcohol.

Zimmer Biomet conducts its activities in an environmentally sustainable manner and minimizes any negative impact on the environment. We comply with all applicable environmental laws, including those affecting air emissions, water purity and waste disposal.

**Zimmer Biomet
is committed
to protecting the health
and safety
of its Customers,
Team Members,
the public
and the environment.**

Section 2

Expectations of Our Team Members

Team Members are expected to do the right thing and follow the Code and the company's policies and procedures in their work on behalf of the company.

Our Team Members directly contribute to Zimmer Biomet's success and reputation by applying their unique skills, sense of responsibility and sound judgment. Zimmer Biomet expects its Team Members to maintain a standard of honesty, taking responsibility for their jobs, accountability for their work and being a good steward of company resources.



Section 2

Expectations of Our Team Members



Business Courtesies (e.g., Gifts and Meals)

Business courtesies—such as gifts, entertainment, meals and travel—are an accepted business practice and may be provided or accepted in accordance with the company’s policies and procedures. Zimmer Biomet believes that decisions about products and services should be made in the best interests of patients. We do not try to earn business by offering or accepting business courtesies as improper inducements to decision makers.

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Conflicts of Interest

A conflict of interest arises when a person’s private interests are in a position to influence or interfere—or even appear to interfere—in any way with Zimmer Biomet’s interests, the Team Member’s performance of duties and responsibilities or loyalties to Zimmer Biomet. The existence of a conflict of interest depends upon the circumstances, including the nature and relative importance of the interests involved. Conflicts of interest are strictly prohibited unless they are disclosed and approved by Zimmer Biomet Human Resources, in consultation with Zimmer Biomet Compliance and Legal.

Team Members who are not sure whether a certain activity or situation might be an actual or potential conflict of interest should contact Zimmer Biomet Human Resources, Compliance or Legal.

Corporate Opportunities

Without the consent of Zimmer Biomet’s Board of Directors, Team Members are prohibited from taking for themselves a business opportunity that is discovered through the use of Zimmer Biomet property, information or position. Team Members may not use Zimmer Biomet property, information or position for personal gain, nor may they compete with Zimmer Biomet directly or indirectly. Team Members owe a duty to Zimmer Biomet to advance the company’s business interests whenever the opportunity to do so arises.

Section 2

Expectations of Our Team Members



Corporate Records

All of Zimmer Biomet's books, records, accounts and financial statements must be maintained in reasonable detail, must accurately reflect our transactions and must conform both to legal requirements and to our system of internal controls. For example, Team Members must:

- ***make sure that manufacturing documents meet internal and external requirements and support Zimmer Biomet's product safety efforts.***
- ***maintain clinical data that meet regulations and corporate confidentiality standards.***
- ***accurately document and record business expenses.***

Unrecorded or "off the books" funds or assets are strictly prohibited. Zimmer Biomet requires honest and accurate recording and reporting of information to help control our processes, to detect and close gaps and to make responsible business decisions. Records should always be kept or destroyed according to Zimmer Biomet's record retention policies.

If you are not sure whether a certain expense is legitimate, ask your manager or other supervisor. Rules and guidelines also are available from Finance.

Team Members are responsible for maintaining the accuracy, confidentiality and security of all records.

Section 2

Expectations of Our Team Members



Use of Corporate Assets

Zimmer Biomet has an ethical responsibility to our stockholders to operate cost efficiently. Similarly, Team Members have an ethical responsibility to protect and ensure the efficient use of Zimmer Biomet's assets and property.

Generally, Zimmer Biomet property, such as office supplies, production equipment, products and buildings, may not be used for private or non Zimmer Biomet business. Zimmer Biomet permits the use of computers or the telephone for occasional and appropriate personal use as long as such use does not:

- ***impact your performance at work;***
- ***result in significant cost to Zimmer Biomet; or***
- ***cause other damages to Zimmer Biomet.***

Theft, carelessness and waste have a direct impact on our profitability, which in turn could impact the company's ability to reinvest in new product development, provide training and enhance Team Member benefit and compensation packages.

When representing Zimmer Biomet, or traveling for the company, please spend responsibly and moderately.

Copyrighted Materials and Computer Software

From time to time, Team Members may be required to photocopy copyrighted work for business purposes. Team Members must ensure that such photocopies comply with applicable copyright law.

Similarly, Team Members may duplicate and use any licensed software only in accordance with the applicable software licensing agreement.

Team Members should contact Zimmer Biomet Legal with any questions regarding this issue.

Section 3

Acting with Integrity

We work hard to earn the trust of healthcare professionals, patients, and government and industry regulators by going the extra mile in everything we do.

We maintain that trust by holding ourselves to the highest ethical standards, conducting our business with integrity and complying with all applicable laws and regulations. Obeying the law, both in letter and in spirit, is the foundation upon which Zimmer Biomet's ethical standards are built. All Team Members must respect and obey all applicable laws, regulations and rules, as well as Zimmer Biomet's policies and procedures.



Section 3

Acting with Integrity



Improper Payments

Zimmer Biomet is committed to complying with applicable anti-kickback, anti-bribery and anti-corruption laws in all countries in which we operate and do business. Team Members must not offer, promise, authorize or pay a kickback, bribe or anything of value (directly or indirectly) to any individual in order to improperly obtain or reward favorable treatment in a business transaction. Zimmer Biomet does not provide, offer or accept improper payments under any circumstances, even if that would result in losing or walking away from business.

Zimmer Biomet does not provide, offer or accept improper payments under any circumstances, even if that would result in losing or walking away from business.

Competition, Fair Dealing and Antitrust

Zimmer Biomet seeks to outperform our competition fairly and honestly. We strive for competitive advantages through superior performance, never through unethical or illegal business practices. Stealing or otherwise improperly obtaining proprietary information from another company, possessing trade secret information that was obtained without the owner's consent or inducing such disclosures by past or present Team Members of other companies is strictly prohibited. Zimmer Biomet expects Team Members to deal fairly with Customers, suppliers, competitors and other Team Members. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair dealing practice.

Zimmer Biomet seeks to outperform our competition fairly and honestly.

Team Members are also prohibited from collaborating with a competitor or from taking any action that could have an improper anti-competitive effect, without pre-approval from Zimmer Biomet Legal.

Section 3

Acting with Integrity



Interactions with Healthcare Professionals

Zimmer Biomet is committed to ethical interactions with healthcare professionals. Strong working relationships with healthcare professionals are essential to Zimmer Biomet's success and to continued improvement and innovation in patient care.

Zimmer Biomet regularly consults with experienced healthcare professionals who render services to Zimmer Biomet in various fields that may include product development, clinical research and training and education on the safe and effective use of our products. Many of these healthcare professionals are also Customers who recommend and use our products and services.

Our collaborations with healthcare professionals are closely regulated by government authorities and subject to additional scrutiny because of the different roles and financial relationships healthcare professionals may have with Zimmer Biomet. As such, we must strictly adhere to the following rules:

- ***Zimmer Biomet does not use interactions with healthcare professionals to improperly influence product, purchasing or coverage decisions.***
- ***All product decisions should be made in the best interests of the patient, and not in return for any kind of payment or other advantage from the company.***
- ***Zimmer Biomet selects and engages healthcare professionals for consulting services solely based on their qualifications, experiences, skills and expertise to address an identified need, not based on any actual or potential Zimmer Biomet business.***
- ***Zimmer Biomet compensates healthcare professionals for legitimate services provided based on fair market value principles.***
- ***All arrangements with healthcare professionals must be properly approved and appropriately documented.***
- ***Zimmer Biomet never conditions or rewards a financial arrangement with a healthcare professional. We do not provide free products, services or grants to a healthcare professional in exchange for an explicit or implicit agreement to use, purchase, order or recommend Zimmer Biomet products.***

Zimmer Biomet never conditions or rewards a financial arrangement with a healthcare professional.

Section 3

Acting with Integrity



Insider Trading

All countries have adopted laws prohibiting stock trading based on material, non-public “insider information.” Team Members may encounter such insider information in the course of their work, including information about potential acquisitions, earnings, new products or discoveries, product approvals, major management changes, upcoming litigation or regulatory proceedings and joint ventures. A Team Member who has access to insider information is not permitted to use or share that information (“tipping”) for stock trading purposes, either for their own personal benefit or for the benefit of another, or for any other purposes except the conduct of Zimmer Biomet business.

This prohibition includes trading in the stocks and securities of, and tipping information related to, Zimmer Biomet as well as:

- ***Current or prospective Customers or Business Partners of Zimmer Biomet; and***
- ***Companies negotiating an agreement with Zimmer Biomet.***

In addition to insider trading prohibitions, Team Members must be alert to how internal information about Zimmer Biomet is communicated outside the company. Communicating information prematurely, incorrectly or without proper clearance—no matter how insignificant, harmless or innocent that communication may seem—could have a serious impact on Zimmer Biomet’s competitive position, stock price, pending litigation or stockholder value.

Purchasing Practices

Zimmer Biomet sources its supplies and services solely on the basis of quality, price and value. We treat our Business Partners fairly, openly and honestly.

In our efforts to support the international community of which we are a part, Zimmer Biomet follows the applicable laws and regulations governing disclosure and conduct related to conflict minerals. We engage in a reasonable due diligence process with our suppliers on the origin, source and chain of custody of conflict minerals.

Individuals who violate insider trading laws by trading or tipping may be subject to severe civil and criminal penalties, even if they did not engage in the transaction or personally benefit from the trading.

We treat our Business Partners fairly, openly and honestly.

Section 4

Regulatory and Quality Excellence

Zimmer Biomet is dedicated to manufacturing products of the highest quality that are both safe and effective.

We respect the laws and regulations of all countries in which we do business and recognize the importance of our relationships with regulators to promote the smooth operation of our business.



Section 4

Regulatory and Quality Excellence



Our Commitment to Quality

Both patients and healthcare professionals rely upon our commitment to the quality of our products, instruments and services. At Zimmer Biomet, we have adopted and implemented regulatory compliant systems and processes to ensure the highest standards of quality and safety. All Team Members play a key role in continually improving Zimmer Biomet's quality assurance systems and processes. We count on our Team Members to follow applicable laws, regulations and policies and procedures. Team Members should also raise questions and voice concerns about issues that may affect the quality or safety of our products, instruments and services.

**Zimmer Biomet
has systems and
processes to ensure
the highest standards
of quality and safety.**

International Trade Restrictions

As a global company, Zimmer Biomet regularly sells and ships our products internationally. We are committed to following applicable import and export control laws and regulations in the United States and in other countries in which we conduct business.

Zimmer Biomet does not participate in trade with sanctioned countries or prohibited boycotts.

Government Inspections and Investigations

From time to time, we may be contacted by, or receive requests for information from, government investigators. It is Zimmer Biomet's policy to cooperate fully with government inspections and investigations. Team Members must never destroy or alter any Zimmer Biomet documents, lie or make misleading statements to a government investigator, attempt to cause another Team Member to provide inaccurate information and/or obstruct, mislead or delay the communication of information or documents to any governmental authority. Team Members must fully cooperate with Zimmer Biomet regarding inspections and investigations.

If a Team Member is contacted by, or receives a request for information from, a government investigator, he or she should immediately notify his or her manager as well as Zimmer Biomet's Chief Compliance Officer or General Counsel. Team Members may not provide any documents to any government investigators without written pre-approval from the Chief Compliance Officer or General Counsel.

To report a known or suspected issue, contact **+1.877.593.4582** (Zimmer) or **+1.888.469.1566** (Biomet).

Section 5

External Communications and Engagement

Zimmer Biomet recognizes the importance of engaging with key stakeholders in the communities in which we operate and do business.

As a publicly traded company, as well as a musculoskeletal healthcare company, Zimmer Biomet follows specific guidelines in advertising, marketing, issuing communications to the public and engaging in the political process. In addition, safeguarding Team Member, Customer and other data is imperative to maintain the trust of Zimmer Biomet's internal and external stakeholders. As a good corporate citizen, we encourage participation in and regularly support charitable, educational and humanitarian organizations around the world.



Section 5

External Communications and Engagement



Corporate Communications

In the course of doing business, we communicate with Customers, healthcare professionals, government officials, financial analysts and others in the public domain. Communicating with these audiences in a thoughtful, careful and appropriate manner is vital to safeguarding our reputation.

All written and oral communications intended for external audiences—including speeches, press releases and presentations—must be reviewed by Zimmer Biomet Corporate Communications, and potentially others, before issuance. If the communication is geared toward the investment/analyst community, Zimmer Biomet Investor Relations must review the communication as well. This policy also applies to any information about Zimmer Biomet that Team Members may post online or share via social media.

Advertising and Marketing Practices

Advertising and marketing are important tools that contribute to our success. Zimmer Biomet follows local, regional and country-specific laws and regulations governing advertising and marketing practices. Advertising and promotion of Zimmer Biomet products are subject to internal pre-approval processes, including approval by Zimmer Biomet Legal.

It is Zimmer Biomet's policy to promote and market its products in a lawful and truthful manner. Team Members must be careful to offer an accurate representation of product and service capabilities and benefits. All promotional presentations, including product claims and comparisons, should be accurate, balanced, fair, objective, unambiguous and consistent with product labeling.

Similarly, comparisons of Zimmer Biomet products to a competitor's products should be fair, substantiated and in compliance with all laws and regulations. Zimmer Biomet products should not be labeled or marketed in ways that could confuse them with those of its competitors. We should not disparage competitors' products, services or employees.

We market our products only for their approved uses as determined by regulators and governmental agencies.

Generally, Zimmer Biomet does not engage in activities to build or market healthcare professionals or their institutions. Any activities related to healthcare professionals must comply with applicable legal and regional practices and meet fair market value requirements.

We market our products only for their approved uses.

Section 5

External Communications and Engagement



Proprietary or Confidential Information

Team Members must use their judgment when disclosing proprietary or confidential information regarding Zimmer Biomet or its Customers to other Team Members, and do so only on a legitimate “need to know” basis. Team Members must not disclose or permit the disclosure of any proprietary or confidential information to non-Team Members, except when such disclosure is pre-approved by Zimmer Biomet Legal or is legally mandated by applicable laws or regulations.

If confidential or proprietary information gets into the wrong hands, either accidentally or on purpose, Zimmer Biomet or its Customers may suffer damages. Team Members’ obligation to maintain the confidentiality of Zimmer Biomet’s proprietary information continues even after their employment ceases.

Every Team Member has the right to confidentiality of certain employment records and personal information, such as their name, address, date of birth, government identification number, compensation, employment status and performance, consistent with local laws. Zimmer Biomet collects and maintains this personal information in compliance with applicable laws and regulations. We restrict access to this information as appropriate and use it only as necessary for legitimate business purposes, including the administration of human resources.

All uses of Zimmer Biomet’s trademarks and trade names should conform to our policies and procedures. Zimmer Biomet respects the intellectual property of others and will not knowingly infringe others’ valid patents, trademarks and copyrights. If any Team Member believes that another company is infringing a Zimmer Biomet patent, trademark or copyright, he or she should contact Zimmer Biomet Legal.

Zimmer Biomet takes confidentiality seriously.

What is proprietary or confidential information?

- **Proprietary information:** intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.
- **Confidential information:** all non-public information that might be of use to competitors, or harmful to Zimmer Biomet or its Customers, if disclosed; confidential information also includes all information that may be used to identify patients who use Zimmer Biomet products.

Section 5

External Communications and Engagement



Public Disclosures

As a public company, Zimmer Biomet is held to certain standards with respect to public disclosures and announcements. All disclosures and announcements made by Zimmer Biomet to stockholders or the investment community must be accurate and complete, fairly present the subject matter of the disclosure (whether Zimmer Biomet's financial condition, results of operations, cash flows, liquidity or otherwise) and be shared on a timely basis as required by applicable law and stock exchange requirements.

Team Members may be called upon to provide or review information that will be included in Zimmer Biomet's filings with the United States Securities and Exchange Commission ("SEC") or other government agencies or otherwise disclosed to the public. Zimmer Biomet expects all Team Members to take this responsibility very seriously and to provide information that is relevant, objective, accurate and complete to promote full, fair, accurate, timely and understandable disclosures.

Charitable, Educational or Humanitarian Efforts

Zimmer Biomet is committed to the communities in which it operates and does business by encouraging participation in and supporting charitable, educational and humanitarian organizations and activities. These efforts may never be contingent upon, or related to, the recommendation, use or purchase of Zimmer Biomet products.

Political Process and Contributions

Government officials often need timely, valid information upon which to base their decisions. At times, through designated spokespersons, Zimmer Biomet will offer opinions on legislation that may affect the interests of Zimmer Biomet's business, Team Members or Customers. We comply with all applicable laws and regulations related to lobbying or attempting to influence government officials. Nevertheless, Zimmer Biomet does not make any corporate political contributions.

Section 6

Using the Code

The Code outlines core principles and ethical standards that apply to all Team Members.

You are expected to conduct yourself according to the legal and ethical standards outlined in the Code and Zimmer Biomet policies and procedures. Team Members should seek to avoid even the perception of improper behavior. Zimmer Biomet expects all Team Members to read, understand and follow the Code. Periodically, in addition to completing training requirements, Team Members are expected to sign a written acknowledgment that they have read, understand and agree to follow the Code.



Section 6

Using the Code



Reporting a Potential or Known Violation

From time to time, Team Members may learn or suspect that other Team Members or Business Partners may have violated the company's policies and procedures, or even applicable laws, regulations and industry codes. Team Members are required to report any known or suspected concerns or violations either in person to their manager, supervisor, Zimmer Biomet Compliance or through one of the company's Compliance Hotlines. Known or suspected activities that must be reported include the following:

- ***Violations of applicable laws, regulations or industry codes;***
- ***Violations of U.S. federal healthcare program requirements ;***
- ***Violations of this Code;***
- ***Violations of our policies and procedures; and***
- ***Concerns about Zimmer Biomet's accounting, internal accounting control or auditing related matters.***

It is in our collective best interest to report such violations immediately, as doing so may help Zimmer Biomet prevent illegal or unethical conduct from occurring or continuing, and may also prevent a situation from escalating.

All reports submitted are confidential and will be investigated. Team Members may choose to make an anonymous report, unless otherwise required by law. While we strive to maintain confidentiality of the reporting person, a government or court order may compel Zimmer Biomet to disclose the identity of the reporting person.

Failure to report known or potential violations can have significant consequences. Depending upon the seriousness of the violation and applicable laws, Team Members who violate the Code, fail to report a potential compliance issue, withhold information about an actual or suspected compliance or legal issue or otherwise fail to cooperate in an investigation will face appropriate disciplinary action, which may include termination of employment or service. In addition, Team Members who violate the laws and government regulations could expose themselves and Zimmer Biomet to substantial fines, penalties and damages.

**Zimmer Biomet's
Compliance Hotlines
are operated by a third-
party service provider,
and are available
24 hours a day,
7 days a week.**

To report a known or suspected issue, contact **+1.877.593.4582** (Zimmer) or **+1.888.469.1566** (Biomet).

Section 6

Using the Code



To report a known or suspected issue regarding:

Legacy Zimmer Team Members, Business Partners, or business activities:



Call **+1.877.593.4582** (toll-free in the United States)



Email zimmer-compliance-hotline@zimmer.com



Visit <https://www.compliance-helpline.com/Zimmer.jsp>

Legacy Biomet Team Members, Business Partners, or business activities:



Call **+1.888.469.1566** (toll-free in the United States & Canada)



Visit <http://www.ethicspoint.com>
(select “File a New Report” and enter “Biomet” as the organization name)

Zimmer Biomet Team Members, Business Partners, or business activities:



Call **+1.888.469.1566** (toll-free in the United States & Canada)



Visit <http://www.ethicspoint.com>
(select “File a New Report” and enter “Zimmer Biomet” as the organization name)

Section 6

Using the Code



Non-Retaliation

Zimmer Biomet prohibits retaliation against any Team Member who makes a good faith report of a known or suspected compliance or legal issue. “Good faith” does not mean that the Team Member has to be right, but it does mean that the Team Member believes they are providing truthful information. If a Team Member feels they are the subject of retaliation, that individual can report the situation to the Compliance Hotlines or Zimmer Biomet Compliance or Legal.

Team Members may bring any questions or concerns to Zimmer Biomet’s attention through one of the available channels. Team Members must never be discouraged from using any of the available channels within Zimmer Biomet. Even simple questioning of a person reporting a violation can lead to unintentional retaliation, as it may make the person feel that they did something wrong by choosing one method over another. Any person reporting a violation under the Code must be able to freely choose whichever method they are most comfortable with to communicate the concern to Zimmer Biomet.

Any Team Member who retaliates against another Team Member for reporting known or suspected violations of our legal or ethical obligations will be in violation of the Code and subject to disciplinary action, up to and including dismissal. Retaliation may also be a violation of the law and could subject both the individual offender and Zimmer Biomet to legal liability.

To report a known or suspected issue, contact **+1.877.593.4582** (Zimmer) or **+1.888.469.1566** (Biomet).

Section 6

Using the Code



Conflicts

The Code provides guidance regarding applicable laws and regulations where Zimmer Biomet operates; however, such laws and regulations are often complex and vary from country to country. If a conflict exists between the Code and a law or regulation, the most restrictive applies. Team Members who believe a conflict exists between the Code and a law or regulation and/or are unsure how to proceed should contact Zimmer Biomet Compliance or Legal.

Waivers

It may be appropriate for a provision of the Code to be waived in a particular circumstance. Any Team Member seeking a waiver must speak to his manager or supervisor, who will then need to contact Zimmer Biomet Compliance. Unless pre-approved in writing by Zimmer Biomet's Chief Compliance Officer, all provisions of this Code apply.

Any waiver of the Code for Zimmer Biomet's executive officers or directors may only be made by Zimmer Biomet's Board of Directors and will be disclosed promptly according to the applicable requirements of the SEC.

Zimmer Biomet reserves the right to periodically review the Code to determine if revisions are appropriate and to then make any necessary revisions.



ZIMMER BIOMET
Your progress. Our promise.™

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