Medacta International

CODE OF BUSINESS CONDUCT AND ETHICS

MINIMALLY INVASIVE TECHNIQUES AND PERSONALIZED SOLUTIONS

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VISION AND MISSION

The Medacta Group ("**Medacta**" or the "**Group**") operates in joint prosthetics, neurosurgery, and sports medicine. The commitment to the patient is reflected in the pursuit of continuous improvement through responsible innovation and meticulous design.

Our vision is to improve the care and well-being of orthopedic and spine surgery patients around the world guided by our experience and passion. With our surgical innovations and medical education programs, we strive to enable a healthy and active lifestyle for every patient, strongly focusing on healthcare sustainability.

Our mission is to transform the patient experience by developing advanced surgical approaches, implants, and instruments through responsible innovation. With this goal in mind, we focus on increasing our collaboration with surgeons and universities worldwide, constantly investing in medical education, innovative technologies, and personalized solutions.

Medacta values the richness of a continuous exchange of knowledge and ideas: Medacta's products are the result of continuous research, along with a constant alignment with the market demands and technical and scientific developments.

FOREWORD

The Code of Business Conduct and Ethics (the "**Code**") reflects our Vision and Mission and sets out the values and guiding principles that underpin our policies and procedures.

The Code defines and formalizes the set of principles and ethical values in which Medacta recognizes itself and which form the basis of the company culture, as well as the standard of behavior required by anyone interacting with Medacta.

The Code and the principles set out in it indicate to all Medacta's stakeholders the standards for appropriate and inappropriate conduct, and it also becomes the point of reference when an activity is not governed by specific procedures or instructions.

1. THE #BEMEDACTA VALUES

Medacta firmly believes that company culture is a key to sustainable success, actively contributing to growth. Medacta's goal is to ensure that each and every employee understands and endorses the company's culture and values, to successfully build and sustain continuous improvement.

It is of the utmost importance that these values remain alive and, above all, are passed on to all the people who will join Medacta in the years to come.

All the Group's activities must be carried out in compliance with the values that Medacta aspires to in its culture: **#beMedacta**.

MEDACTA CULTURE: A KEY FOR SUSTAINABLE SUCCESS

TRUST AND INTEGRITY

*It's at the core of who we are and is **never negotiable**, all our interactions meet the highest professional & ethical standards.*

EFFICIENT EXECUTION

*We take ownership and **accountability** in everything we do and **we deliver results** in the most efficient way!*

PATIENT AND CUSTOMER FOCUSED

*Everything we do is always with our patients and customers in mind and always with the **highest sense of urgency and priority**.*

SUSTAINABLE INNOVATION

*Our ideation and passion drive us **continuously to improve** our Products, Processes and Technologies in a sustainable way.*

TEAMWORK

*We work as a TEAM, **always respectfully** and ensure we work together for the greater good of Medacta **#beONE**.*

2. ETHICAL PRINCIPLES OF CONDUCT

Medacta scrupulously observes the following principles:

» **LEGALITY**

Medacta acts in compliance with the regulations in force in the countries where it operates, respecting the national and international laws. Medacta carefully and constantly monitors the introduction of new regulations and any changes to those in force, adapting its activities to the new rules.

» **ACCOUNTABILITY**

Medacta is committed to giving account to its stakeholders, both internal and external, of its objectives, activities, and results. Medacta represents in a clear, accurate and timely manner the economic and financial results achieved and communicates its reports with transparency, clarity, completeness, and relevance of information.

» **CONFIDENTIALITY**

Medacta guarantees the confidentiality of the information it receives in the course of its activities and rejects any unlawful treatment of data and information.

» **SOCIAL AND ENVIRONMENTAL RESPONSIBILITY**

Our objective is to do everything possible to ensure that sustainability does not remain just an important part of our corporate culture and a fundamental component of our long-term business strategy, but rather becomes a value shared among all people involved in our activities, so that we can actively contribute to the sustainable development policies of the territory and the community to which we belong. We are fully committed to continuously reducing our environmental impact through the improvement of our operational energy efficiency, favoring the use of renewable energy and continuously improving environmental management systems at our manufacturing plants.

» **EQUALITY AND EQUAL OPPORTUNITIES**

Medacta ensures respect for the individual, promoting equal treatment and combating all forms of discrimination. Our employees operate worldwide and represent a mix of experiences and backgrounds. We believe this diversity supports our innovation and continuous collaboration with surgeons. We offer all employees the same opportunities to develop their own skills and capabilities, avoiding any form of discrimination based on race, sex, age, nationality, religion, disability or personal beliefs.

3. SCOPE OF APPLICATION

The Code applies to all the companies of the Medacta Group. The principles and provisions of the Code are binding, without exception, for all company representatives, such as the Corporate Bodies of Medacta (i.e. Members of the Board and Group Executive Management), fixed term and indefinite term contracts, part-time and full-time employees (the "**Employees**"), and any third party who collaborates with or acts in the name or on behalf of or in the interest of Medacta, regardless of the relationship, even temporary, that binds them to it, including distributors, sales agents, collaborators, including occasional collaborators, any temporary workers, consultants (together defined as the "**Collaborators**").

Each Employee and Collaborator carries out his or her work and/or assignment with professional commitment, diligence, efficiency, and fairness, making the best use of the tools and time at his or her disposal and assuming the responsibilities related to the commitments undertaken. Medacta bases all its commercial relations on the respect of the values and principles contained in the Code and requires that its customers and suppliers (together referred to as "**Partners**") adhere to the Code and the provisions contained therein with the same level of integrity required of Employees and Collaborators.

The Code is valid both in Switzerland and abroad, taking into account the cultural, social and economic diversity of the various countries in which Medacta operates. Should local regulations establish rules that are more restrictive than the Code, the same will prevail over the Code. Medacta also recognizes the codes of ethics of the professional associations to which it belongs (Annex 1).

4. VALUE OF HUMAN RESOURCES AND EQUAL OPPORTUNITIES

Medacta recognizes the centrality of human resources and believes that an essential factor for the success and development of the company is the professional contribution of the people who work in it. The management of Medacta's human resources is based on the respect of the dignity, personality, and professionalism of each of them, in a framework of mutual loyalty and trust.

The management of employment relationships is based on the criterion of meritocracy, as well as on the corporate values. This criterion is observed in all business relationships established with Medacta, including the choice of Employees and Collaborators.

The supreme value of the human being is recognized by Medacta, which is committed not only to guaranteeing, but also to developing his or her inviolable rights. Medacta operates within the general framework of the Universal Declaration of Human Rights of the United Nations and the fundamental Conventions of the International Labour Organisation (ILO).

Medacta protects and promotes the value of human resources, in order to improve and increase the wealth of skills possessed by each employee and collaborator. Medacta also guarantees the physical and moral integrity of its Employees and Collaborators, working conditions that respect individual dignity and personal beliefs and opinions, as well as safe and healthy working environment, specifically rejecting child and forced labor and complying with the regulations regarding working hours and remuneration.

Medacta repudiates any discrimination based on sex, gender identity, sexual orientation, geographical origin, race, language, personal and social conditions, religious and political beliefs, membership of minorities, marital status, pregnancy, age, health conditions or disability.

Medacta favors a working environment that nurtures the involvement and empowerment of Employees and Collaborators, with regard to the specific objectives to be achieved and the ways to pursue them. Medacta also favors the promotion of equal opportunities with reference to working conditions and opportunities, training, development, and professional growth, in full respect of the current regulations and values that inspire the Code, and in equal measure for full-time or part-time relations. Medacta periodically examines the performance of its employees through a performance evaluation program and provides a remuneration program that recognizes their merits.

In order to guarantee a safe and serene working environment, favorable to healthy interpersonal relations and based on the principles of solidarity, respect and cooperation, Medacta undertakes to oppose any behavior that may be considered as harassment or mobbing: the establishment of an intimidating, hostile or isolating work climate towards individuals or groups of workers, unjustified interference with the performance of work services by others, obstruction of others' individual work prospects for mere reasons of individual competitiveness, physical or verbal behavior of a racist or defamatory nature, inappropriate humor, sexual harassment, and behavior or speech that may upset a person's sensitivity must be avoided.

At Medacta we encourage and promote equal opportunities

5. HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

Medacta carries out its activities in harmony with the current legislation protecting working conditions.

Medacta is committed to spreading and consolidating a culture of safety, developing risk awareness, and using all necessary resources to guarantee the safety and health of its employees, collaborators, partners, and the community in which it operates.

For these reasons, Medacta's activities are managed in compliance with the current legislation on health and safety at work. Within the scope of their duties, employees contribute to the prevention of risks and the protection of health and safety in the workplace, also by taking part in training sessions organized by Medacta.

Medacta considers environmental protection to be a key factor in its business activity and is inspired by the principles of respect and safeguarding of the environment and the territory, which are considered of the utmost importance, both for their intrinsic value and in relation to their impact on the health of man and other animal species. To this end, Medacta is committed to respecting the environmental regulations in force and works to ensure that its business activities comply with the highest standards of environmental safety.

At Medacta we are committed to ensuring the safety and health of our employees, staff, partners and the community in which we operate

6. DUTIES AND RESPONSIBILITIES OF EMPLOYEES AND COLLABORATORS

Medacta's employees and collaborators are required to perform their work with diligence, competence, and loyalty, investing their resources and time in an appropriate manner in the performance of their activities. Medacta considers the knowledge and application of the regulations that specifically govern its activities and the respect for the laws and regulations in force, as well as the prescriptions contained in the Code, to be essential components of the relationship of trust with its employees and collaborators. Each Employee is required to inform his/her manager of situations of serious irregularity or violation of internal procedures, laws, and regulations in force, of which he/she has become aware.

In relations with customers, and in general in external relations entertained during their work activity, each Employee and Collaborator is obliged to conform his/her conduct to criteria of courtesy, collaboration, and transparency, providing, where requested or necessary, complete and adequate information, and avoiding, in all circumstances, recourse to elusive or unfair practices, or in any case aimed at undermining the independence of judgement of the interlocutor.

In relations with third parties, suppliers, clients and in general in external relations entertained in the course of their work, all employees and collaborators must avoid conduct that may, even only indirectly, damage the image and commercial reputation of Medacta. It is important to remember that every Employee and every Collaborator reflects Medacta's image and is consequently obliged to behave in a way that is consistent with the company's professional standards and values.

Each Employee and Collaborator is obliged to use courteous and respectful manners with Partners, and to behave in accordance with civic duties. It is considered the right and duty of each employee to expect and respect the proper decorum of dress and hygiene in the workplace.

At Medacta we work with diligence, competence and loyalty

7. FAIRNESS AND PREVENTION OF CORRUPTION

Medacta recognizes that fair, free, and loyal competition is a decisive factor in the growth and constant improvement of the company.

All the actions and operations carried out and the behavior of Employees, Collaborators and Partners in the performance of their duties or functions are inspired by transparency, correctness, and mutual respect, as well as legitimacy in both form and substance, according to the regulations in force and Medacta's internal procedures, also in order to protect the company's assets and image.

Medacta condemns any behavior or activity carried out for corrupt purposes in order to achieve its economic objectives and, to this end, a Corporate Compliance Program is aimed at meeting the global principles of compliance in the countries where Medacta is present. The written policies and procedures cover the main aspects of the sphere of compliance which must be followed by any employee or associate working for Medacta. Corrupt practices, illegitimate favors, collusive behavior, and the solicitation of personal benefits for oneself or others, directly and/or through third parties, are therefore prohibited without exception.

The acceptance of money from parties who are in, or intend to enter into, business relations with Medacta is prohibited.

It is never permitted to pay or offer, directly or indirectly, payments, material benefits or other advantages of any kind to third-party public or private employees in order to influence or compensate them for an act of their office.

In particular, the following are not allowed:

- the pursuit of Medacta's interest at the expense of compliance with laws or regulations, as the Group unconditionally subordinates its economic interests to compliance with all laws and regulations;
- the pursuit of personal interests and/or those of third parties to the detriment of social interests;
- the abusive exploitation, in the personal interest and/or that of third parties, of Medacta's name and reputation, as well as of the information acquired and business opportunities learned of in the performance of one's own office or function.

Each Employee and Collaborator may not accept or carry out, for themselves or for others, pressures, recommendations, or reports that may cause damage to the Group or undue advantages for themselves, for Medacta or for third parties, or make promises or undue offers of money or other benefits.

If an Employee or Collaborator receives an offer or a request for benefits from a third party, he/she shall immediately inform his/her immediate superior or, where appropriate, the person to whom he/she is required to report for the appropriate initiatives.

It is strictly forbidden to offer gifts or benefits in any form whatsoever, offered, promised, or made to customers, to natural or legal persons acting in their employment or on their behalf, or to their family members, directly or through intermediaries, as well as unlawful pressure exerted on them, to induce, facilitate or remunerate a decision.

Relations with Partners are conducted in compliance with standards of efficiency, loyalty, impartiality, and traceability of transactions, in accordance with the internal procedures established and implemented for this purpose.

Medacta pursues its activities through the offer of quality products and services at competitive conditions and in compliance with the regulations of the sector and those protecting consumers and competition.

Employees and Collaborators constantly check the credentials of all persons who undertake economic and commercial relations with Medacta. Furthermore, Medacta requires every transaction to be documented and transparent; in this sense, it prohibits the acceptance of any amounts in cash.

8. CONFLICT OF INTEREST

Employees, Collaborators, members of the Board and of the Group Executive Management, in the performance of their duties or functions, pursue the objectives and general interests of Medacta and therefore refrain from activities, behavior and acts that are in any way incompatible with the obligations connected with their relationship with Medacta. Employees and Collaborators must inform their hierarchical superior or, if necessary, the person to whom they are required to report, without delay, taking into account the circumstances, of situations or activities in which they may have, directly or on behalf of third parties, interests that conflict with those of Medacta. Employees and Collaborators respect the decisions taken by Medacta in this regard.

9. CONFIDENTIALITY AND PRIVACY

Employees, Collaborators, members of the Board and of the Group Executive Management and Partners ensure the utmost confidentiality regarding news and information that are part of the company's assets or inherent to Medacta's activities, acquired and/or processed during the performance of their duties or functions.

The processing of confidential information must be carried out in compliance with the applicable laws and regulations. The processing of the personal data of individuals and entities must be carried out in full respect of the rights, fundamental freedoms, and human dignity, with particular reference to confidentiality and personal identity, in accordance with the relevant legislation in force in the individual countries.

All employees and collaborators, in their relations with clients, and in general in the external relations entertained during their work activity, are obliged to keep confidential the news and information they learn in the exercise of their functions, and which are not subject to information in conformity with the laws and regulations. Each employee is also obliged to observe the duty of confidentiality towards other Medacta employees.

In particular, each employee must not give information about Medacta's commercial activity, production, or any other kind of activity - except for that which is necessary for the performance of his or her duties - and must not release information concerning any company activity or data. Each employee may only consult the documents to which he/she is authorized to have access and is obliged to use them in conformity with his/her duties and official obligations, allowing access only to those who have the right to do so and in conformity with the instructions given by Medacta.

At Medacta we always ensure the utmost confidentiality regarding news, information and data

Each employee will prevent the possible disclosure of data by observing the security measures provided by Medacta, keeping the documents entrusted to him/her in an orderly and careful manner and avoiding making unnecessary copies. This obligation of confidentiality will survive the termination of the employment relationship of the above-mentioned persons with the Group. Medacta recognizes the right to confidentiality of the data of its Employees and Collaborators and guarantees their use, storage, and access in accordance with applicable laws and regulations.

10. INSIDER TRADING

The Employees and Directors of Medacta Group SA, Medacta International SA and its subsidiaries have or may have access to inside information, i.e., confidential information which, if made public, could have a significant effect on the trading price of any security.

Employees and Directors must at all times refrain from:

- exploiting insider information to, directly or through third parties, buy or sell securities or use financial instruments derived from securities; and
- exploiting insider information to, directly or indirectly, recommend to another person or legal entity (including family members, relatives, and friends) to buy or sell securities or use financial instruments derived from securities (tipping).

11. INTELLECTUAL AND INDUSTRIAL PROPERTY

Medacta holds or has the availability of important intellectual and/or industrial property rights, the correct management of which is considered fundamental. Therefore, all Employees and Collaborators whose activity, task or function involves, in any way, the handling of data, information or documents concerning Medacta's intellectual and/or industrial property rights, have the duty to guard them with the utmost diligence, accuracy and confidentiality.

The rights of intellectual and/or industrial property of products, work activities and/or knowledge developed in the working environment belong to Medacta, which holds the exclusive right to exploit them, according to the methods and times considered most appropriate, in compliance with the regulations applicable from time to time.

In the same way, Medacta respects and protects the intellectual and industrial property rights of others, ensuring that only original products and works are used in the company's activities, regularly licensed by the legitimate owners, and used in accordance with the authorizations received.

12. USE OF COMPANY ASSETS AND MATERIALS

All employees and collaborators must safeguard Medacta's company assets. Specifically, every Employee and Collaborator is responsible for the protection of the company assets and materials entrusted to him/her and is obliged to work diligently to protect them (by way of example only, from theft, loss, damage, illicit or inappropriate use), through responsible behavior in line with the company regulations that govern their use.

The means of communication provided by Medacta, such as telephone, fax, internet, intranet, and e-mail, must be used exclusively for business purposes. Private use is only permitted if it does not adversely affect work performance, does not involve an expense for Medacta, and does not cause liability or damage to Medacta.

All employees and collaborators who use company assets must work diligently, behave responsibly in their use of, and in line with, the procedures, avoiding improper use that may cause damage or a reduction in efficiency, or in any way be in contradiction to Medacta's interests.

The above is also applicable to Partners, to the extent that they may be concretely involved in the safeguarding of the company's assets, insofar as they are allowed to use Medacta's goods, materials, or resources.

13. MARKETING AND ADVERTISING PRACTICES

All sales and marketing activities must comply with the product labeling approved for the specific local market.

Medacta adheres to local, regional, and country-specific laws and regulations governing marketing and advertising practices.

Marketing and advertising of Medacta's products are subject to internal pre-approval processes.

Employees may only use the promotional materials approved for use with Partners in a given market.

Materials aimed at educating patients about a condition may also be considered promotional material.

In some circumstances, it is permissible to donate demo products to Health Care Professionals ("**HCPs**") and /or Health Care Organizations ("**HCOs**") for evaluation purposes to allow them to evaluate them and decide whether and when to use, order, purchase or recommend them in the future.

14. INTERACTIONS WITH HEALTHCARE PROFESSIONALS AND HEALTHCARE ORGANIZATIONS

Medacta is committed to engaging in ethical interactions with healthcare providers.

Strong professional collaboration with healthcare professionals is essential to Medacta's success and continuous improvement and innovation in patient care.

We are honest and fair in all aspects of our business, and we demand the same in our relationships with everyone with whom we do business.

The Employee and the Collaborator shall take all necessary steps to know and comply with the laws and regulations governing all contacts they may have with HCP/HCOs and state officials.

As a manufacturer of medical devices, Medacta follows the codes published by AdvaMed in the United States, MedTech Europe in Europe and similar industry reference codes used in other markets (Annex 1).

The applicable laws and industry codes are those of the country in which the HCP/HCO or state official resides, or where he or she is licensed to practice.

Employees must not offer or make improper payments (directly or indirectly, in cash or in kind) to HCP/HCO, government officials or others. Employees must not encourage others or allow others to offer or make improper payments.

It is prohibited to hire as an employee or third-party representative an immediate family member of an HCP or state official to facilitate the use or purchase of products or services by the HCP or state official or to do or retain business.

All meetings held with HCPs related to Medacta's business activities must be professional and have an appropriate purpose.

It is permissible to provide product education and training to HCPs as support for safe and effective use of products. If such events involve out-of-town travel for HCPs, it is permissible to pay reasonable travel and modest lodging expenses consistent with all applicable laws and codes.

Employees may not invite HCPs to conferences, or pay the cost of attending conferences, as a reward for, or to improperly induce, the purchase of products.

An Employee may offer lunch or dinner as a gesture of courtesy during business negotiations, provided he/she adheres to Medacta's restrictions and comply with applicable laws and codes.

Gifts may be given to HCP/HCOs or government officials when such gifts are permitted under applicable laws and industry codes. Gifts must be modest in value and infrequent. They may include educational items that benefit patients or have a genuine educational function.

In some circumstances, it is considered appropriate for Medacta to enter into agreements with HCP/HCOs. Examples of appropriate agreements are:

- consulting,
- scholarships for researchers,
- professional meetings and speaking engagements,
- teaching,
- studies and publications of a clinical nature,
- license agreements,
- research, scholarships, and donations.

All consulting arrangements are based on a documented Needs Assessment. All consultants selected for an engagement are approved by the Compliance Committee in line with applicable procedures. The selection is based on Medacta's needs and the skills and experience of HCPs. It must not be influenced by improper factors such as past, present, or future sales to the selected HCP/HCO.

All payments to HCP/HCOs or government officials must be authorized in advance, and in line with the relevant procedures. All payments made by Medacta (or the third-party representatives or others acting on behalf of Medacta) must be accurately documented.

Medacta may only enter into an intellectual property rights agreement with an HCP for a product or service if it expects the HCP to make, or has already made, a substantial corresponding contribution to the development of the product or service.

Medacta may make grants or donations for educational, philanthropic, or humanitarian purposes consistent with all applicable laws, industry codes and this Code.

At Medacta we interact ethically with healthcare professionals

15. COMPETITION AND FAIR TRADING

Medacta guarantees a business on competitive terms, which it develops in compliance with all the rules set out to protect fair competition. Medacta rejects any conduct or business practice that is illegal, deceptive, unfair, or otherwise detrimental to the rules of good faith.

In particular, improperly obtaining or using trade secrets and proprietary information of others, without the owner's consent, or obtaining such disclosures from past or present employees of other companies, is strictly prohibited.

Medacta supports a transparent and fair relationship with all its stakeholders and ensures that business practices are carried out in such a way that they do not take any competitive advantage in an unfair manner.

16. PUBLIC DISCLOSURES

As a listed company, Medacta is subject to compliance with certain standards regarding public statements and disclosures. Medacta promotes transparency and accuracy of information to shareholders and the investment community, in compliance with applicable laws and regulations, as well as the requirements of the stock exchange.

17. INVESTIGATIONS AND CONDUCT WITH PUBLIC AUTHORITIES

Relations with institutions and public authorities must be based on the principles of legality, transparency, and fairness.

In the course of any interaction or relationship with national or international institutions and public authorities, any behavior that could improperly influence the decisions of the counterpart is absolutely forbidden.

In particular, during investigations or inspections, Employees are required to cooperate and provide information in a truthful, transparent and accurate manner, and not to delay or hinder in any way the operations of institutions and public authorities.

18. PURCHASING PRACTICES

The selection of Partners and the determination of the purchase of goods and/or services must take place in compliance with the principles of the Code and are based on the effectiveness of the service as well as the guarantees of assistance, timeliness, and efficiency.

Medacta procures goods and services exclusively on the basis of quality, price and value, treating suppliers fairly, openly and honestly.

We are committed to responsibly sourcing the materials that go into our products and selecting our suppliers based on a qualification process that includes, inter alia, respect for human rights and working conditions.

At Medacta we select our suppliers through a scrupulous qualification process

19. VIOLATIONS AND REPORTS

Any violation of the provisions contained in the Code by Directors, Employees, Collaborators or Partners exposes Medacta to potential damage and damages the relationship of trust, based on the values, established with Medacta.

For this reason, Directors, Employees, Collaborators and Partners are required to promptly report in writing any confirmed or suspected violation through the anonymous online form (https://www.medacta.com/EN/compliance-global-about-us) or, in the case of Employees, to their direct superior and the HR or Compliance department or the legal department.

Medacta is committed to protecting the confidentiality and anonymity of reports received, without prejudice to the provisions of the law, regulations, and legal proceedings applicable to the case in question.

Reports will only be taken into consideration if they contain sufficient information to identify the terms of the violation and to allow Medacta to carry out an appropriate investigation.

Medacta encourages Directors, Employees and Collaborators to promptly report any violations, and in any case undertakes to investigate any violation of which it otherwise becomes aware.

Medacta will not allow retaliation or any kind of discriminatory consequence for reports and disclosures that have been made in good faith, given that the ability to communicate openly is also a necessary condition for the implementation of the Code.

All Employees, Collaborators and Partners are also required to cooperate in internal investigations relating to violations and conduct not in line with the Code.

Compliance with the rules of the Code, including the obligation to report, must be considered an essential part of the contractual obligations of Employees, Collaborators and Partners. The violation of the rules of the Code constitutes a breach of contractual obligations, as it constitutes precise and binding rules of conduct.

20. APPROVAL AND AMENDMENTS

The Code is approved by the Board of Directors of Medacta Group SA and implemented by the Directors of the Group companies.

Medacta provides for a continuous review of this code. Any future updates, due to regulatory adjustments or to the evolution of civil awareness, will be approved by the Board of Directors and promptly communicated to Employees, Collaborators and Partners.

21. COMMUNICATION AND DISSEMINATION OF THE CODE

Medacta undertakes to disseminate the Code to all interested parties.

Medacta informs its Employees about the provisions and application of the Code, recommending compliance and ensuring at the same time:

- interpretation and clarification of the provisions contained in the Code,
- verification of effective compliance with the Code,
- any future updates and implementation of the provisions of the Code, according to the needs that arise from time to time.

Medacta also undertakes to disseminate and share the Code with all its collaborators and partners with whom it has commercial and professional relations, so that they conform to the standards prescribed therein.

In order to ensure maximum dissemination, the Code is published at the following internet address: https://www.medacta.com/EN/code-of-business-conduct.

ANNEX 1

LOCAL CODES OF ETHICS

- EU area => MedTech Europe Code of Ethical Business Practice.
- USA => AdvaMed Code of Ethics.
- Australia => Medical Technology Industry Code of Practice.
- Japan => Fair Competition Code of the Medical Devices Industry.

TRADE ASSOCIATIONS:

- **Medacta International:**
  MedTech Europe (corporate member)
  Swiss Medtech (member)
- **Medacta France:**
  Snitem (member)
- **Medacta Australia:**
  MTAA (member)
- **Medacta Austria:**
  Austromed (member)
- **Medacta Belgium:**
  beMedTech (member)

The above lists are to be considered for indicative purposes only and are not exhaustive.

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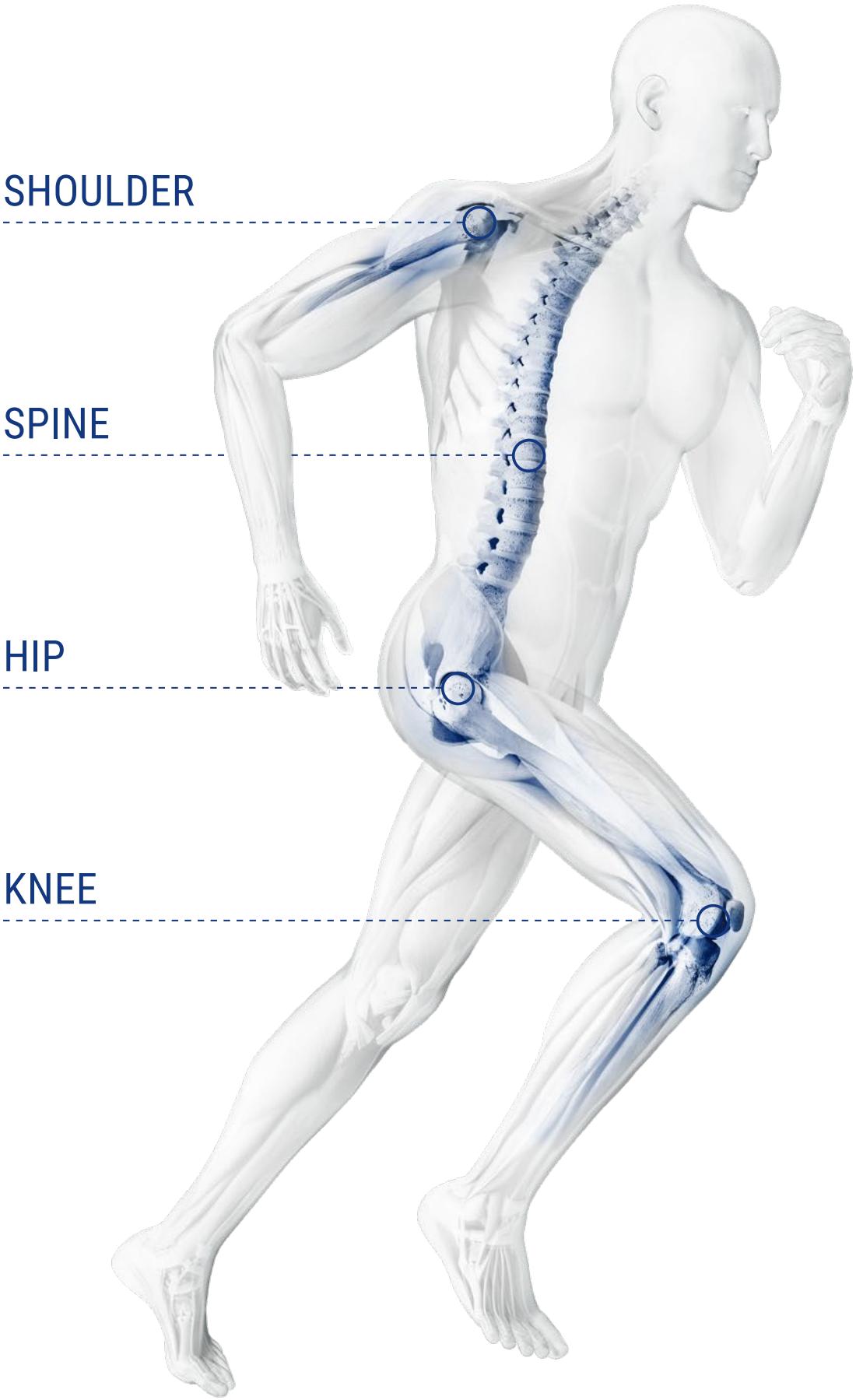
SHOULDER
SPINE
HIP
KNEE

Medacta International

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SCAN & DOWNLOAD
YOUR DIGITAL VERSION

Ref: 99.99CCBE.11 Rev.02-2024