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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool, referred to internally as the Compliance Hotline, created by NAVEX Global to assist Zimmer Biomet in addressing violations of the Code of Business Conduct and Ethics (“the Code”) and applicable laws and regulations, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our Team Members are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting, auditing and internal controls fraud directly to the audit committee.
- An effective hotline system will augment our other efforts to foster a culture of integrity and ethical decision-making.

How do I follow-up on a concern that I reported to the Zimmer Biomet EthicsPoint hotline?

You may follow-up on the status of your report by either calling +1(877) 593-4582 or visiting www.ethicspoint.com and entering your Report Key and Password.

Report Submission Questions

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

Any violation of the Company's policies and procedures, including the Code, or even applicable laws, regulations and industry codes.

Can I still report a concern if I am not an employee?

Certainly, Zimmer Biomet is a customer focused, socially responsible global industry leader. We want anyone interacting with the Company to have an avenue to voice their concerns.

Am I supposed to report my concern through EthicsPoint or should I report directly to my manager or human resources?

You are encouraged to speak up if you become aware of a potential violation of the Code or local law. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself. If you require further guidance regarding the Compliance Hotline and reporting your concern, please contact Corporate Compliance via email at compliance.hotline@zimmerbiomet.com.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. As a Zimmer Biomet Team Member you are obligated to report potential issues in accordance with your local Code. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of the entire Company.

Does management really want me to report?

We certainly do. In fact, we *need* you to report. You know what is going on in our Company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the Company and our community. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the Company who are charged with evaluating and investigating the report. Each of these report recipients has had training in keeping these reports in the utmost confidence.

What if I do not want to report my concern through the EthicsPoint Hotline?

The Company hosts an internally hosted and managed email account to accept confidential messages from individuals that do not wish to submit their concern through the EthicsPoint hotline. Please send your concern to compliance.hotline@zimmerbiomet.com and a member of the Corporate Compliance team will respond to your message within 1 business day.

How will Zimmer Biomet investigate my concerns?

The Company is committed to investigating all reported concerns, where appropriate, to the extent possible. The Global Compliance Investigations (“GCI”) team was established to expeditiously and confidentially investigate concerns brought to the Company’s attention. As appropriate, GCI may confidentially engage other functions within the Company or outside firms to assist with an investigation.

What if I remember something important about my concern after I file the report? Or what if the Company has further questions for me concerning my report?

When you file a report at the EthicsPoint website or through the EthicsPoint Call Center, you receive a unique Report ID and are asked to choose a Password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by the Company and add further information that will help with an investigation. We strongly suggest that you return to the Compliance Hotline in the time specified to answer Company questions. You and the Company now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on my report as secure as when I first submitted the report?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Isn't this system just an example of someone watching over me?

The Compliance Hotline is maintained as a positive aspect of our overall philosophy of living the Code, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern.

Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

Who do I contact if I have a general inquiry related to the Code or other Company policy?

For general inquiries please contact us via email at globalcompliance@zimmerbiomet.com.

I have lost my Report Key and/or Password, what do I do?

To ensure the confidentiality of reports submitted to the Compliance Hotline, EthicsPoint is unable to provide a reporter with a lost Report Key or Password. If this happens and you have additional information to provide, please submit a new report and indicate that it is in follow-up to a previously reported concern.

Reporting Security & Confidentiality

It is my understanding that any report I send from a Company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website (www.ethicspoint.com). Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years...".

Is the telephone toll-free Compliance Hotline confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer from NAVEX Global will type your responses into the EthicsPoint website. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

I am afraid that I will face retaliation if I report my concern, what should I do?

Zimmer Biomet has a strict non-retaliation policy that protects those who report a concern in good faith. Furthermore, you may submit your concern anonymously, where allowable by local laws, via EthicsPoint. If you feel you have been subject to retaliation for reporting a concern, please immediately contact Compliance, Legal or HR.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

All unethical conduct, at any level, ultimately hurts the Company and all Team Members and business partners, including you. So if you know of any violations of Company policy or unethical conduct, consider it your duty to yourself and your colleagues to report it.

I am not sure if what I have observed or heard is a violation of Company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. The Company rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The Compliance Hotline is managed by a select few on the Corporate Compliance team. Furthermore, the EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.