

# UK Modern Slavery Act and California Transparency in Supply Chains Act Statement

## DISCLOSURE REQUIREMENTS UNDER THE UK MODERN SLAVERY ACT 2015 AND CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010 FOR THE FISCAL YEAR 2019

### UK MODERN SLAVERY ACT 2015 (“UK ACT”)

This statement is made pursuant to Section 54, Part 6 of the UK Act and sets out the steps Zimmer Biomet is taking to ensure that slavery and human trafficking is not taking place in its supply chains or any parts of its business. Zimmer Biomet Holdings, Inc. (together with its subsidiaries, “Zimmer Biomet” or the “Company”) is a global leader in musculoskeletal healthcare.

### CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010 (SB 657) (“CALIFORNIA ACT”)

Under the California Act, companies of a certain size doing business in the State of California are obligated to disclose their efforts to eradicate slavery and human trafficking from their direct product supply chains for the goods that they offer for sale.

### COMPANY DESCRIPTION

Zimmer Biomet designs, manufactures and markets orthopedic reconstructive products; sports medicine, biologics, extremities and trauma products; office based technologies; spine, craniomaxillofacial and thoracic products; dental implants; and related surgical products. The Company collaborates with healthcare professionals around the globe to advance the pace of innovation. Zimmer Biomet’s products and solutions help treat patients suffering from disorders of, or injuries to, bones, joints or supporting soft tissues. Together with healthcare professionals, Zimmer Biomet helps millions of people live better lives.

### COMPANY DISCLOSURE

Zimmer Biomet strives to achieve and maintain the highest possible standards of corporate integrity and ethical behavior. The Company takes the issues of slavery and human trafficking very seriously and will continue doing its part by responsibly managing its supply chain in an effort to eradicate human trafficking and slavery. Zimmer Biomet does not endorse any form of modern slavery in its operations or in its supplier networks. The Company takes a number of steps with respect to verification of its supply chain and certification of materials to ensure suppliers are operating in an ethical manner, including the following:

- 1. Verification** – Zimmer Biomet expects that its suppliers will conduct their businesses in a lawful manner and in compliance with high standards of integrity and ethics. In order to establish guidelines for such standards, Zimmer Biomet has established a Code of Supplier Conduct. The Code of Supplier Conduct requires supplier compliance with important legal, ethical, behavioral and other requirements. Specifically, the Code of Supplier Conduct states that suppliers must not support, promote or engage in the practice of slavery or human trafficking, and it requires suppliers to comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.


Zimmer Biomet suppliers are further expected to take reasonable and necessary steps to help ensure that their sub-contractors and sub-suppliers conduct business in compliance with the Code of Supplier Conduct. Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with Zimmer Biomet’s Code of Supplier Conduct, to maintain necessary records and documentation to demonstrate their compliance with the Code of Supplier Conduct and to report noncompliance or concerns regarding questionable behavior to their Zimmer Biomet Sourcing representative or via the Zimmer Biomet Compliance Hotline. In the Code of Supplier Conduct, slavery, human trafficking and child labor are specifically prohibited. If a supplier is found to be in violation of the Code of Supplier Conduct, Zimmer Biomet will take prompt, remedial measures to address the violation.

Zimmer Biomet reserves the right to terminate its relationship with any supplier for failure to comply with the Code of Supplier Conduct.

- 2. Audits** – Zimmer Biomet continues its practice of monitoring and auditing its suppliers throughout its global supply chains and has implemented a risk-based approach in conducting periodic supplier audits to evaluate compliance with prohibitions against trafficking and slavery in supply chains. In addition, to the extent that Zimmer Biomet suspects or receives notice that a supplier is involved in these activities, Zimmer Biomet will conduct an inquiry, or third party audit if warranted, and take appropriate action as required by law.
- 3. Certifications** – Zimmer Biomet requires its suppliers to represent and certify, by acceptance of the Company's purchase order terms and conditions, that in providing goods and services under the purchase order, the supplier has complied and will comply with all applicable federal, foreign, state and local laws, rules and regulations, including, without limitation, all anti-slavery and anti-human trafficking laws.
- 4. Accountability** – Zimmer Biomet has established a Code of Business Conduct and Ethics, which applies to all Zimmer Biomet personnel, including officers, directors and employees (including full-time, part-time temporary and contract employees) (collectively, "Team Members"). Zimmer Biomet expects its business partners and contractors to share the general principles stated in the Code of Business Conduct and Ethics. These general principles require Zimmer Biomet Team Members to comply with all applicable laws and regulations, including but not limited to those relating to human trafficking and slavery. The Zimmer Biomet Code of Business Conduct and Ethics specifically calls out child labor, forced labor (slavery) and human trafficking. The Code of Business Conduct and Ethics explains that if a Team Member needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should consult with or report the matter to his or her manager, supervisor or the Compliance Office or via the Compliance Hotline. All reports of alleged violations will be investigated by Zimmer Biomet. Disregard or deliberate ignorance of the law, failure to report known or potential violations and/or failure to cooperate in an investigation will not be tolerated and may lead to disciplinary action, including termination of employment.
- 5. Training** – All Team Members are trained annually on the Code of Business Conduct and Ethics. The Code of Business Conduct and Ethics requires Team Members to comply with all applicable laws and regulations, including but not limited to those relating to human trafficking and slavery. Team Members who have direct responsibility for supplier management are also trained on the Zimmer Biomet Code of Supplier Conduct. The Code of Supplier Conduct informs suppliers that Zimmer Biomet will take prompt, remedial measures to address any violations.


Zimmer Biomet strives to continuously improve its programs and practices to ensure compliance with applicable laws and regulations and the Company's high ethical standards, and to meet the expectations of its customers, shareholders, associates and other stakeholders.

**Zimmer Biomet Holdings, Inc.**

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Bryan C. Hanson  
President and  
Chief Executive Officer

**Zimmer Biomet UK Ltd.**

DocuSigned by:  
  
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Michael Green  
VP North Region (EMEA)

**Biomet UK Ltd.**

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Francis Moloney  
Director