

Code of Conduct

Revision 8

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Core Values

Our core values form an integral part of Stille's Code of Conduct.

Perfection

We strive for perfection in every step: a perfect production process, a perfect delivery and perfect service to our customers.



Reliability

Customers can always rely on our products and on us as a company to fulfill our promises.

Passion

We are passionate about simplifying and adding value, both for surgeons and patients.

Application of the Code

This Code of Conduct applies to everyone at Stille – from the members of the Board of Directors to every employee. Stille also strongly encourages suppliers, agents, consultants, and other business partners within their sphere of influence to adhere to the principles set out in this Code, which shall be applied when assessing current and potential partners.

Of particular importance are established standards, which ensure that working conditions in the supply chain of products sold and marketed by Stille are safe, that workers are treated with respect and that business operations are environmentally responsible and conducted ethically. It applies to all Stille-suppliers and their subcontractors supplying goods or services to Stille.

Social responsibility principles apply throughout the whole supply chain and entire life cycle of products and services.

Our suppliers are expected to adhere to these standards in the conduct of their own business and to push the requirements of this code of conduct towards their own sub-suppliers and sub-contractors.

Suppliers shall at a minimum require their next tier suppliers to acknowledge and implement the requirements stated herein.

This Code outlines the following commitments by Stille and our Partners:

- Support of International Principles
- Basic Standards of Conduct
- Respecting the Rights of All Employees
- Avoid Conflicts of Interest
- Sensitivity to the Environment
- Protecting Confidential Information
- Ensure Appropriate Business and Government Relations
- Proper Reporting and Accounting

- Assurance of Non-Retaliation to Employees

Support of International Principles

Stille prides itself as an ethical and socially responsible organization. In developing this Code of Conduct, it is based on widely accepted international conventions and declarations, including relevant International Labor Organization (ILO) Conventions (<http://www.ilo.org>), the UN Universal Declaration of Human Rights (<http://www.un.org>) and UN Global Compact (<http://www.unglobalcompact.org>), reaffirming its support for human rights, fair labor practices and the environment.

Basic Standards of Conduct

Quality in Everything We Do

Stille is in the business of providing products which enable doctors to improve, and even save, the lives of their patients. To this end, Stille is committed to designing, manufacturing, and marketing the safest and highest quality products and services. This quality and safety commitment is a responsibility shared by all employees. Every employee is expected to strive for excellence in everything they do and to ensure that all their activities are directed to advancing the best long-term interest for our customers and patients.

Conduct Business Ethically

Stille expects all employees and our partners to act ethically and with integrity and to demonstrate social and environmental responsibility in performing their jobs. Our customers, the patients they serve and the many governmental agencies that oversee and regulate our business expect nothing less. Our success in large part depends upon satisfying those expectations.

Be Truthful

Stille's commitment to ethics and integrity in business includes a special emphasis on being truthful. In line with our core values, we must be truthful in all communications with one another, our customers and with governmental agencies. We must keep complete and accurate business records.

Comply with All Laws and Regulatory Requirements

Every employee must carefully observe all laws and regulatory requirements applicable to Stille. Violations by even one employee can cause great harm to our company's reputation and ability to carry on its operations and can compromise the efforts and accomplishments of many other employees. In addition, governmental agencies are increasingly enforcing the laws to which we are subject by prosecuting corporations and their employees and seeking to subject them to heavy penalties, fines and, in extreme cases, imprisonment. Stille's suppliers shall comply with national laws, other applicable regulations as well as industry relevant standards in the conduct of their business operations.

Know the Law

Our obligation to behave lawfully requires that we know the law. Every employee is expected to be familiar with the basic laws and regulatory requirements that specifically apply to his or her job as well as those that generally affect our business. This is everyone's responsibility. We can learn by receiving on-the-job training, reviewing applicable company policies, attending presentations, and asking questions. In addition, because we have sales in other countries on many continents, the laws of one nation may impact Stille's operations in another country. In those cases, employees are expected to advise their affected colleagues of such laws and shall assist them in assuring compliance. In the event there is ever a conflict between the more restrictive laws and regulations and the principles in this Code of Business Conduct, the law shall prevail.

In this regard, any officer with direct reports in Stille bear a special responsibility for ensuring that their direct reports understand and follow this Code of Conduct and must take prompt and appropriate action when a violation of law or company policy is suspected.

Respecting the Rights of All Employees

Human Rights, Equality of Opportunity

Stille seeks to attract and retain the most qualified employees and to afford everyone opportunities for development. Stille and our suppliers is strict to follow UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 & 79, ILO Recommendation No. 146 and ensures that child labor is not present in our organization. Every employee is entitled to be treated with dignity and respect by his or her supervisors, managers, subordinates, and peers. Stille will not tolerate discrimination or harassment of any sort (including discrimination in hiring, compensation, access to training or promotion) because of race, ethnic or national origin, caste, religion, sex, age, sexual orientation, disability, union affiliation, political opinion or any other basis prohibited by law and according to ILO Conventions Nos. 100 and 111, UN Convention on Discrimination Against Women.

Stille expects every employee and partner to conduct in accordance with the letter and spirit of these principles.

Health and Safety

Stille will also seek to provide a safe and healthy working environment for all employees. It will strive to continuously improve working conditions to reduce the possibility of accidents and injury to health. Stille will provide training to assure that each employee understands the safety procedures applicable to his or her job function. Each manager or supervisor is responsible for assuring that such training is adequate, that each employee has the tools necessary to be successful in their job, and that all safety and health policies and procedures are followed. Because safety affects all employees, it is the responsibility of each employee to be aware of any potentially unsafe condition and to report or correct it immediately. Working hours shall be in accordance with ILO Conventions Nos. 1 and 14.

Illegal Drugs and Alcohol

Employees deserve to work in an environment free of substance abuse – both to ensure the health and safety of all employees and to assure the quality of products and services. To this end, Stille will show zero tolerance for the use of illegal drugs during working hours, including attending to work duties under the influence of such substances. While Stille recognizes that the consumption of alcohol may be customary at certain work-related functions, for instance during dinners at the end of the workday, Stille does not accept consumption that leads to impaired ability to act professionally or in any other way in accordance with this Code. Consumption of alcohol during working hours or attending to work duties under the influence of alcohol, is not acceptable.

If an employee must take a medication, whether prescription or OTC drug and that might impair job performance, he or she should advise his or her supervisor in advance and the supervisor, will determine any necessary work accommodations.

Freedom of Association

Stille respects the right of each worker to engage in or refrain from collective bargaining, agreements and other collective activity as contemplated by applicable law and ILO Conventions Nos. 87, 98, 135 and 154.

Human Rights

Stille supports and respects the protection of internationally proclaimed human rights and ensures that it is not involved in human rights abuses all according to ILO Conventions Nos. 29 and 105.

Avoid Even the Appearance of a Conflict of Interest

An employee may not use his or her position for personal gain or for the benefit of family members. Each employee is required to conduct business activities in a manner consistent with the highest level of business

ethics, free from any potential personal or private business interests that might adversely influence his or her judgment. Employees are expected to avoid situations even where there may be only an appearance of a conflict of interest because even the appearance of a conflict may damage Stille's reputation, undermine trust among employees, and cost the company the respect of suppliers, customers, patients, and governmental authorities. No employee may accept gifts if such gifts would be perceived as possibly influencing the employee's judgment in dealings with any contractor, supplier, customer, or other third-party doing business with Stille. As a rule, no employee may accept any gift other than one of purely nominal value, and no employee may ever accept any gift of cash or cash equivalent or shares or options in another company.

Similarly, no employee should accept any meals or entertainment that could influence his or her judgment or appear to third parties to influence his or her judgment, in any dealing with any contractor, supplier, customer or third party. Customary business meals and entertainment would not normally violate this prohibition. Stille expects its employees and our suppliers to abide by these rules with great care and sensitivity and to resolve uncertainties by asking his or her supervisor for advice and, when required by Stille's policy, obtaining the supervisor's consent.

Obtaining Consent for Outside Business Interests

Employees may not undertake any outside employment that would interfere with their ability to fully perform their responsibilities for Stille. All employees must disclose and obtain approval of a member of Stille's management team before engaging in any outside employment or any substantial political or civic undertaking which might interfere with the employee's ability to perform his or her job effectively.

Sensitivity to the Environment

As a responsible corporate citizen, Stille will strive to run our businesses in an environmentally, socially and financially sustainable manner. We will seek to meet today's needs without compromising our ability to live up to the demands of tomorrow. We will look to every employee and suppliers to assist us in designing our products, processes, and systems in such a way that energy, raw materials, and other resources are used efficiently from the start of production through the entire life cycle. Stille and our partners will ensure that relevant sustainability requirements set in law and regulations are fulfilled, and that action is taken to identify and eliminate potential risks.

Protecting Confidential Business Information

Employees have a duty of loyalty to Stille and, in fulfilling that duty, are expected to safeguard Stille's confidential information. The misuse or wrongful disclosure of Stille's confidential information to third parties (including friends and family members) could be extremely damaging to Stille's business and cause it significant financial harm, in addition to possibly being unlawful.

Business and Governmental Relations

Fair Competition

Stille shall compete in the marketplace vigorously, fairly and in full accordance with applicable law and United Nations Convention against Corruption. Stille and its employees as well as our suppliers and distributing partners shall respect the principles and rules of fair competition and shall not violate applicable antitrust laws. These laws, which generally prohibit any agreement among competitors which would restrict the freedom of a competitor on issues of pricing, customer selection or terms or conditions of sale, apply to all business arrangements, irrespective of their form, as well as to business conduct in general.

Business Partners; Governmental Authorities; and Customers

Stille's relations and dealings with business partners and customers shall be characterized by fairness and candor. Business practice varies from country to country. However, all employees must comply with Stille's ethical standards and any overall business practices applicable to each business environment. Stille shall not

engage in bribery and shall not offer customers, potential customers, governments, government agencies or authorities, organizations, or any representatives of such entities any payments, rewards, gifts or favors in violation of applicable laws or rules or other regulatory requirements. Even if no law or rule is involved, a payment or gift may not be made if it would violate generally accepted business practices.

Dealing with Governmental Agencies

Stille's business is highly regulated, and we are required to compile and maintain numerous records and substantial information and to file reports with various government agencies throughout the world. We must comply with these requirements to the best of our ability; carelessness alone can constitute an offense in some instances and can call into question Stille's competency and good faith. Accordingly, Stille expects that all employees who prepare information, records, or submissions for governmental authorities, or who otherwise deal with such agencies, will do so diligently and with the highest integrity.

Political Involvement

Any political involvement on part of Stille shall follow all applicable laws and business standards. Stille limits its political involvement to issues directly relating to its vision and business purpose. In all other respects, Stille stands for political neutrality regarding political issues, political parties, and representatives. The Stille name and assets must not be used to promote political issues unrelated to its vision and business purpose. When not acting on behalf of Stille, employees may participate in the political process as responsible citizens as their individual consciences may dictate.

Advocating Stille's Position

From time to time, Stille may find that it disagrees with governmental agencies, public interest groups and others on an interpretation of a law or regulation. Although it will protect its rights and advance its position, Stille will always act with the same sense of responsibility and integrity that it expects of its employees.

Reporting and Accounting

All financial reporting and accounting shall be maintained and reported in compliance with local generally accepted accounting principles and in a manner that accurately describes Stille's true financial position, the results of operations and the true nature of its business transactions, assets, and liabilities. Stille shall comply with International Financial Reporting Standards (IFRS) when applicable to the market in which it is reporting. Stille shall strive to provide disclosure that is open, fair, relevant, timely and understandable.

Travel and Business-Related Expenses

Employees are required to promptly record business expenses completely and accurately on expense reports in accordance with Stille's policies and procedures. Entertainment, meals, and travel expenses that are reported on expense reports must have a legitimate business purpose and not be lavish or extravagant. All such business-related expenses must comply with Stille's policies and procedures and be supported by accompanying documentation.

Reporting Violations and Communicating Concerns

Duty to Come Forward

As part of its commitment to ethical and legal behavior, Stille requires every employee and supplier to report any actual or apparent violations of law or ethical standards so that they can be investigated and dealt with appropriately. This obligation includes any instance where one suspects, but is uncertain whether, a violation may be occurring. Failure to comply with this duty to come forward is a violation of Stille's policy and can result in serious disciplinary action, including possible termination of employment or signed partner agreement.

Stille imposes this requirement even on employees who are not directly violating the company's ethical and legal standards, because any time an employee or contractor fails to live up to our ethical and legal obligations, both our company and its employees can be profoundly and adversely affected. In addition, Stille is committed to addressing employees' concerns and wants to foster openness with employees about ethical and legal issues. Thus, Stille encourages all employees to report wrongdoing and to ask questions if they have any concerns about compliance with law or this Code of Conduct.

Knowing What Issues to Raise and When

An employee should bring to management's attention any instance in which he or she is aware of unlawful conduct or conduct that violates the standards described in this Code of Conduct. Employees should also raise with management any concerns they may have as to whether proper procedures are being followed, even though they are not certain whether legal or ethical standards are being violated. It is also important that employees make management aware whenever they believe adequate resources or training are not being provided to enable employees to comply with legal standards applicable to Stille. Issues can be dealt with early and effectively if questions are raised promptly.

Procedures for Raising Issues

Employees are encouraged to raise issues of concern with their immediate supervisor. If, for any reason, an employee is uncomfortable approaching his or her supervisor, he or she may also satisfy his or her obligation to bring issues forward by:

- Speaking with any member of Stille's Extended Group Management Team
- Speaking with any other person designated for this purpose by Stille
- Reporting issues of concern through Stille's whistleblower system

Assurance of Non-Retaliation

To ensure that employees are comfortable with reporting issues or concerns, Stille has a policy which prohibits harassment of, or retaliation against an employee or other person who, in good faith, reports a known or suspected violation of law or of company policies. In addition, in all cases, confidentiality will be maintained to the extent possible consistent with laws and regulations and Stille's need to investigate the issue. Although coming forward will not immunize an employee from the consequences of misconduct, the employee's good faith reporting of an incident will be protected.

Any supervisor or manager who has engaged in, or condoned, any form of retaliation against an individual in response to a good-faith report of a violation or suspected violation will be subject to discipline, up to and including termination of employment.

Investigation of Complaints

Stille promises to take seriously every inquiry and complaint an employee makes. Each will be fully investigated on the merits and, depending on the results of the investigation, appropriate action will be taken.

Policy Against Retaliation and Confidentiality

Any supervisor or manager who has engaged in, or condoned, any form of retaliation against an individual in response to a good-faith report of a violation or suspected violation will be subject to discipline, up to and including termination of employment.

Conclusion

We are privileged to work together in an atmosphere of ethical behavior and integrity. Every Stille employee will be expected to make a personal commitment to support, contribute to and uphold the reputation and legacy of Stille by adhering to the principles set forth in this Code of Conduct as well as in the company's supporting policies and procedures. Stille's reputation and success depends on it. Surgical Perfection. For life.

