



GLOBAL COMPLIANCE PROGRAM

At CONMED, we live by our Values, and one of those values is that ‘We Do Things the Right Way.’ As a global healthcare company, we are committed to providing quality products that improve patients’ lives around the world. In support of that commitment, we conduct our business ethically and in compliance with all applicable laws and regulations.

Our global Compliance Program is in place to ensure We Do Things the Right Way by supporting our culture of ethics and compliance and aligning our operations with regulatory requirements. The Compliance Program is managed pursuant to the widely recognized seven elements of an effective compliance program, including:

- **Compliance Officer and Compliance Committee:** Our Compliance Program is administered by a dedicated Compliance Officer and overseen by our Corporate Compliance Committee, which is comprised of key executive leaders and CONMED’s Chief Executive Officer. Sub-Compliance Committees representing business units and international geographies are in place as well to ensure compliance is operationalized in all aspects of CONMED’s business.
- **Written policies and procedures:** Our Code of Business Conduct and Ethics serves as the foundation for how we conduct business at CONMED – ethically and in compliance with laws and regulations. In support of our Code and in alignment with the AdvaMed Code of Ethics, our Healthcare Compliance Program outlines key standards related to our operations as a healthcare company. Our Compliance Program also includes global and local policies¹ intended to ensure compliance with topics such as reporting concerns and non-retaliation, professional conduct, healthcare professional interactions, research and education grants, product donations, anti-bribery and anti-corruption, fair competition, insider trading, and many other important topics. Our Quality Management System also includes a wealth of policies intended to ensure product related compliance.
- **Effective lines of communication:** CONMED employees and third parties have various resources available to them to raise compliance-related questions or report potential concerns. One of those resources is the CONMED Hotline, which is administered by a third party provider and available globally via phone or the web. The CONMED Hotline always offers the option of raising a question or reporting a concern anonymously, and CONMED strictly prohibits retaliation against anyone for reporting a good faith compliance concern.

¹ CONMED maintains a \$2,500 annual per healthcare professional spending limit in accordance with California law. This limit applies to certain promotional activities and excludes drug samples, continuing medical education programs, health education scholarships, and legitimate professional services. CONMED has established corporate processes to track and monitor compliance with this spending limit.



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- **Education and training:** Training on our Compliance Program and important ethics and compliance information, including reporting options, is provided to all employees, and training on subject-specific compliance topics is provided to relevant employees. We provide routine communication on compliance policies and topics to help keep our shared compliance obligations top of mind for employees. We also provide training to our distributors on our CONMED compliance expectations to ensure third parties selling and distributing our products understand and operate by our high standards.

Auditing and monitoring: As a key component of our Compliance Program, we perform a detailed risk assessment that informs our program priorities. To address some of these risks and assess the effectiveness of our Compliance Program, we monitor various business processes and compliance controls and complete periodic compliance audits, conducted both internally and by external firms. Compliance risks and processes are also incorporated into our internal audit planning. To certify compliance and help identify any additional risk areas, CONMED leaders and employees in relevant positions complete an annual Code of Business Conduct and Ethics certification.

- **Prompt response to detected offenses:** Any reported instance of potential noncompliance is addressed promptly to determine if misconduct has occurred and take appropriate corrective action. This includes ongoing management of the CONMED Hotline and coordination amongst the Compliance Program and other relevant functions responsible for investigating concerns. Reported concerns and substantiated cases are shared with the Corporate Compliance Committee and the Audit Committee of the CONMED Board of Directors. Trends related to misconduct are tracked and contemplated in broader Compliance Program planning.
- **Enforcement of standards:** Our Compliance Program outlines well-publicized disciplinary guidelines to ensure employees understand the consequences of noncompliance. Recognizing that each case of misconduct is unique, the individual circumstances of the matter and other relevant factors are evaluated to determine appropriate corrective action, and the process is managed consistently across all levels of the organization regardless of an individual's position, job title, or stature within the company.

In addition to the seven elements, our Compliance Program focuses on ongoing program improvements. We recognize that our industry and the needs of healthcare professionals and patients are always evolving, and in that spirit CONMED prioritizes continuously improving. Part of this push to grow and do better includes consistently evaluating, updating, and maturing our Compliance Program to ensure we are at all times managing new risks faced by the company and striving to sustain and support our culture of ethics and compliance.