

**PURPOSE**

Zimmer Biomet expects all of its employees to act in accordance with the highest standards of personal and professional integrity in all aspects of their activities, to comply with all applicable laws, rules and regulations, to deter wrongdoing and abide by Zimmer Biomet's Code of Business Conduct and Ethics and other policies and procedures adopted by the Company that govern the conduct of employees.

This Code of Ethics is intended to supplement Zimmer Biomet's Code of Business Conduct and Ethics that is applicable to all employees, officers and directors of the Company.

**SCOPE**

The following persons are subject to this Code of Ethics:

- the CEO;
- the Chief Financial Officer;
- the Controller/Chief Accounting Officer;
- all employees in the global Finance organization level Z07 (Vice President) and above; and
- any other employee so designated by the CEO or the Chief Financial Officer.

**DEFINITIONS**

- CEO – Chief Executive Officer
- Code of Ethics – this Code of Ethics for CEO and Senior Financial Officers
- Company – Zimmer Biomet Holdings, Inc. and its subsidiaries
- SEC – United States Securities and Exchange Commission
- you – a person subject to this Code of Ethics
- Zimmer Biomet – Zimmer Biomet Holdings, Inc. and its subsidiaries

**REFERENCES**

- Zimmer Biomet Code of Business Conduct and Ethics

**POLICY**

You agree to:

- engage in and promote honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;

- protect the confidentiality of non-public information about the Company or its customers or suppliers acquired in the course of your work and prevent the unauthorized disclosure of such information unless required by applicable law or regulation or legal or regulatory process;
- provide information to ensure full, fair, accurate, timely and understandable disclosure in reports and documents the Company files with, or submits to, the SEC or other regulators and in other public communications made by the Company;
- comply and take reasonable action to cause others to comply with applicable laws, rules and regulations of federal, state and local governments and other appropriate private and public regulatory agencies; and
- promptly report to the Audit Committee of the Board of Directors any conduct that you believe to be a violation of law or business ethics or of any provision of this Code of Ethics.

You are prohibited from directly or indirectly taking any action to fraudulently influence, coerce, manipulate or mislead the Company's independent public auditors for the purpose of rendering the financial statements of the Company misleading.

You understand that you will be held accountable for your adherence to this Code of Ethics. Your failure to observe the terms of this Code of Ethics may result in disciplinary action, up to and including termination of employment. Violations of this Code of Ethics may also constitute violations of law and may result in civil and criminal penalties for you and/or the Company.

If the Company makes a substantive amendment to or grants a waiver from this Code of Ethics, it will disclose such amendment or waiver either by filing a Form 8-K or by posting the information on its Internet website, [www.zimmerbiomet.com](http://www.zimmerbiomet.com).

## **REPORTING VIOLATIONS**

You are required to report any known or suspected violations of Zimmer Biomet's policies and procedures, applicable laws, regulations, or industry codes. You may report such violations directly to your manager, supervisor, Compliance or through the Company's Compliance hotline, which may be accessed at [zimmerbiomet.ethicspoint.com](http://zimmerbiomet.ethicspoint.com). The Compliance hotline is operated and maintained by an independent company, not by Zimmer Biomet. Reports and reporter identities will be treated as confidentially as possible, consistent with the Company's commitment to investigate such reports and any legal disclosure requirements. You may choose to make reports anonymously, where permitted by law. Failure to report a potential compliance issue can result in discipline, up to and including termination of employment. Zimmer Biomet prohibits retaliation against persons who make a good faith report of a known or suspected Compliance or legal issue.

## **AUDITING AND MONITORING**

This Code of Ethics and any related supporting documents are subject to auditing and monitoring.

**RECORD KEEPING**

This Code of Ethics will be kept in accordance with Zimmer Biomet's document retention requirements and filed within the appropriate document control system.