



**Our Code:**  
Our Work Matters



# A Message from the CEO

To all Integra colleagues:

Since 1989, we have been growing our portfolio of innovative solutions in surgical, neurologic, and regenerative care, which have enabled clinicians around the world to restore patients' lives.

Our Integra corporate values define who we are as a company and inform every decision that we make for our customers, patients, each other, and our communities. We embrace change, value our people, strive for excellence every day, and recognize the importance of teamwork.

Our Code of Conduct is the foundation for how we behave at Integra and ensures that we conduct business to the highest standards of ethics and integrity. Just as we do what's right for our customers and partners, we should always do the right thing with the confidence to make good decisions—by understanding and following the Code. It distills our values and policies and is aligned with industry and government standards.

Each and every one of our colleagues represents Integra and the strength of our reputation. Our clinicians depend on us and our products to improve the lives of patients around the world.

Thank you for reading this Code and for embodying it every day at Integra. Our work matters to colleagues, customers, and communities.

**Mojdeh Poul**

President and Chief Executive Officer

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# Our Purpose, Mission, Vision, and Values



# Our Purpose and Mission



## Purpose

Restoring patients' lives through technologies that transform surgical, neurologic, and regenerative care.

## Mission

We innovate treatment pathways to advance patient outcomes and set new standards of care. Our work matters to colleagues, customers, and communities - and delivers compelling shareholder value.

# Our Vision



We will be the first choice of clinicians and healthcare systems. Together, we heal brain and body, improving the lives of patients around the world.



# Our Values



## Integrity

Always doing the right thing



## Our People

Recognizing that our people are our greatest asset



## Excellence

Unwavering commitment to our customers, patients, and colleagues



## Embracing Change

Leading and accepting change to achieve Integra's vision



## Decisiveness

Confidence in making good decisions and driving action



## Teamwork

Achieving far more by working together

# We Follow Our Code





# The Basics

## Purpose of the Code

Our values guide us in all that we do, but they may not answer every question that comes up in our work. That's where the Code of Conduct comes in. Our Code explains how our principles come to life and help us make the right decisions in everything we do.

## Applicability

At Integra, we are one team. This means that all employees must follow our Code. The strength of our people—at all levels—sets us apart. This Code applies to all employees, including officers and directors. We also expect contractors, suppliers, and other third parties working on behalf of Integra to meet the standards of ethics and compliance set out in this Code.

## What Happens If We Don't Comply?

Integra takes seriously any violations of this Code. We will conduct fair and prompt investigations of any reports of misconduct. If an employee is found to be in violation, we will take appropriate action. Serious violations may result in termination of employment. In some cases, there can be legal consequences for the company and/or the individuals involved.

# Our Responsibilities

## We Are All Responsible

Because our greatest asset is our people, we must all act in accordance with the law and the high ethical standards outlined in this Code. Teamwork means we achieve more by working together—with integrity. Among other things, we must all:

- Meet our standards, as set out in our Code
- Never compromise our values to achieve our goals
- Learn from and follow our Code, policies and procedures, and all applicable laws
- [Speak up](#) if we think someone is not following the Code, or if we have witnessed a breach of our Code
- Ask for help if we are unsure about the right thing to do in a given situation

## Managers Have Special Responsibilities

Managers play a special role on our team. We rely on managers to be decisive as we change and grow. To do this well and inspire confidence, managers must do all they can to foster a culture of ethics and integrity. Some special duties of managers are as follows:

- Serve as a role model and lead by example
- Encourage your team to speak up about any concerns
- Listen to any concerns raised and handle them appropriately
- Stress that we never compromise our ethics to achieve a business gain
- Never retaliate against anyone who raises a concern, and do not allow others to retaliate



# We Comply with Applicable Laws and Regulations

As a publicly traded global corporation in the healthcare industry, Integra is subject to numerous laws and regulations. Our reputation, integrity, and trustworthiness depend on remaining in compliance with these laws and regulations. Our rigorous compliance program ensures that we achieve this goal (see [Our Global Compliance Program](#)).

In addition, we have adopted the AdvaMed Code of Ethics, the MedTech Europe Code of Ethical Business Practice, and the European Medical Devices Regulation. These resources further our commitment to the highest ethical standards wherever we do business.

In our pursuit of excellence, we comply with all applicable laws, regardless of whether they are discussed in this Code or Integra policy documents. Local management is responsible for understanding local laws. Do not hesitate to seek advice from the Law Department.

# We Make Ethical Decisions

We know that what we do matters. In a perfect world, we would always know the right thing to do. However, in a business as complicated as ours, it can be challenging to find the best path forward. At times, we may find ourselves unsure of the best option for Integra. In such moments, use the following decision tree to guide your action.

## WHERE TO TURN

If you're ever unsure how to proceed, consult with

- your manager,
- the Law Department, or
- the Chief Compliance Officer.

### Can we do it?

Does it follow applicable laws and regulations?

Yes →

No



### Should we do it?

Does it align with our Code, policies, and procedures?

Yes →

No



### Will we do it?

Is it consistent with our values, and will it further our mission and enhance our reputation?

Yes →

No



### Proceed

**Do not proceed.** Consult with your manager to find a better solution. Both the Compliance and Law Departments may also be helpful.

When we make decisions based on our values, we strengthen our ethical culture, minimize risk, and protect Integra's reputation. Never hesitate to seek advice. We achieve more by working together.



# Our Global Compliance Program

We are committed to compliance with national, state, and local laws, rules, and our own policies and procedures. If you have questions or concerns, we encourage you to discuss them with your supervisor or department head. Integra may modify, monitor, and audit this Code of Conduct from time to time.

At Integra, we cooperate with audits and investigations, whether internal or external. To that end, we shall not make any false or misleading statements in connection with an audit or investigation. We will not take any other action that could interfere or improperly influence an audit, inspection, or investigation.

## Chief Compliance Officer

This officer oversees compliance with all applicable laws, this Code, and all related Integra policies and procedures. The Chief Compliance Officer directs the Global Compliance Program and reports to the Executive Vice President, Chief Legal Officer, and Secretary. Other duties include the following:

- Directing and reviewing the results of investigations of noncompliance
- Determining what the Compliance Committee reviews
- Ensuring that the Audit Committee of the Board of Directors receives reports on and reviews material matters of misconduct
- Ensuring that Integra maintains an effective compliance training program
- Auditing and monitoring compliance with policies and procedures



## Compliance Committee

This committee is made up of corporate officers. Its purpose is to implement and maintain the Global Compliance Program. The Compliance Committee has the following responsibilities:

- Establishing compliance standards and procedures, which are set forth in this Code of Conduct and operating policies
- Ensuring compliance with these policies
- Holding meetings at least twice a year and on an as-needed basis
- Making periodic reports to the Audit Committee of the Board of Directors on the results of the Global Compliance Program and any material noncompliance

# We Speak Up

## Asking Questions

Our Code cannot cover every situation. If you face a situation that the Code does not address, use good judgment. The [decision tree](#) can help. Where you have concerns, ask your supervisor, department head, or Human Resources Department. You can also contact the Law Department or the Chief Compliance Officer. By not leaving anything to chance, we do what's right for our customers and ourselves.

## Raising Concerns

We rely on honest communication from our employees. If you see something inappropriate or unethical, or if you witness anything that goes against our Code values, we encourage you to speak up. **You may ask questions, seek guidance, or report concerns in a number of ways:**



### Integra Ethics Hotline

- Go to [www.integralife.com/ethicspoint](http://www.integralife.com/ethicspoint)



### For employees inside or outside of the US who would like to report by phone:

- Call our toll-free number, 1-888-279-6256, or go to [www.integralife.com/ethicspoint](http://www.integralife.com/ethicspoint)
- Select the country where you are located to get the correct phone number



### Reach out directly to the Chief Compliance Officer, Human Resources Department, or your manager.



## RESOURCES

Employee Hotline - International Procedures



## REPORTING A CONCERN

When reporting a concern, you should include as much information as you can. At a minimum, be sure to include:

- **Who:** persons engaged in the incident, including titles
- **What:** what specifically occurred
- **Where:** the location of the incident
- **When:** the time and duration of the incident

**Note:** The Integra Ethics Hotline is a confidential resource that is available 24 hours a day, 7 days a week, 365 days a year. The hotline is operated by an independent company.

## What Happens When I Report an Issue?

When you submit a report to the hotline, you will receive a report number. Please write it down and keep it in a safe place. Use this number, along with a password, to return to the system in five business days to get an update, answer follow-up questions, or provide additional information. Here's what happens next:

- Your report is sent to the Global Compliance Department for a thorough investigation by the appropriate individuals.
- Concerns raised about workplace conditions are referred to Human Resources for investigation and resolution.
- The investigators investigate the concern and report the results.
- If warranted, appropriate disciplinary and/or corrective action will be taken.

Each of us has a responsibility to cooperate with any investigation and to keep any information we learn from it confidential.

## Zero Tolerance for Retaliation

Under no circumstances may anyone at Integra retaliate against an employee who in good faith calls attention to a violation of policy or procedure. The strength and integrity of our people and our team must come first. If someone retaliates against you for making a report or participating in an investigation, contact the Chief Compliance Officer or the Law Department.

## Integra Ethics Hotline

This hotline enables employees to report serious risks of financial wrongdoings to the company. Our hotline is in compliance with, among others, audit and control obligations set forth by the Sarbanes-Oxley Act and the Whistleblowing EU Directive. Where allowed by law, the hotline also provides for reporting of compliance issues relating to quality, regulatory, sales, marketing, human resources, legal, and other matters.



### HOW DO I RECOGNIZE RETALIATION?

Retaliation can take many forms. The following can all be retaliation when directed at someone for raising a concern or participating in an investigation:

- Terminating, demoting, or suspending an associate
- Denying benefits
- Threatening or belittling an associate
- Passing over an associate for a promotion, raise, or bonus
- Requiring an associate to meet burdensome and unrealistic expectations
- Providing negative performance reviews
- Removing an associate from accounts or projects
- Reducing an associate's hours
- Ignoring or leaving an associate out of team events and meetings



### SPEAKING UP

Speaking up can be challenging. We understand if you are concerned about what may happen if you raise concerns.

- **Myth 1:** Integra will retaliate against me if I speak up.  
**Fact:** Integra will never retaliate against you for speaking up.
- **Myth 2:** Your report will be ignored.  
**Fact:** Your report will not be ignored. Integra takes all reports seriously. We always investigate promptly, thoroughly, and fairly.
- **Myth 3:** It's not right to tell.  
**Fact:** When called for, speaking up is the right thing to do. You are not "telling on" your co-worker; you are protecting yourself, your team, and Integra from further harm.



We Do  
What's  
Right for  
Our People



# We Maintain a Safe, Healthy, and Secure Workplace

## What We Stand For

At Integra, we are committed to achieving the highest standards of Environmental, Health, and Safety (EHS) performance for our employees, contractors, and the communities in which we operate.

## Why It Matters

We make medical devices and sell them to surgeons to improve patients' lives. They can't feel safe in their work if we don't feel safe in ours. To ensure we are always generating the highest quality products, we must keep our workplaces safe and compliant at all times.

## How We Do the Right Thing

To maintain a safe, healthy, and secure workplace, we:

- Follow all applicable EHS laws, regulations, and company standards
- Manage workplace risks to provide employees with a safe and healthy work environment
- Provide the necessary resources to live up to our EHS principles
- Educate, train, and motivate Integra employees to work in a safe, environmentally responsible manner.



### REPORTING AN ISSUE

Our commitment to our fellow employees requires that we speak up if we see something unsafe. Reach out to your manager or the Environmental Health and Safety Department with any concerns.



### RESOURCES

Environmental Health & Safety Policy  
Integra - Technology Acceptable Use Policy

# We Deliver Safe and High-Quality Products

## What We Stand For

What we do matters. This is especially true when it comes to the safety and quality of our products. We never compromise when it comes to regulatory compliance, and we strive to provide the highest quality products to our customers.

## Why It Matters

Our commitment to quality is central to how we operate. Surgeons rely on our products in their daily work with patients. We must keep quality and safety at the core of what we do. In the end, patients rely on it.

## How We Do the Right Thing

To ensure we deliver safe, high-quality products, we:

- Always follow all quality procedures and policies
- Never bypass quality controls
- Promote safety and quality in all places we make our products
- Report any quality or safety issues immediately
- Communicate with customers to replace worn or damaged products



## WE MAKE PRODUCTS THAT ARE USED TO SAVE LIVES

Quality is at the core of what we do. Our Quality Department stands on these four principles:

- We provide life-saving products that are safe and effective.
- We are committed to continuous improvement. This applies to our Quality Management System, our products, and our services.
- We meet all regulatory requirements.
- We strive to meet the needs of our customers and partners. Our goal is total customer satisfaction.



## WHAT ARE BEST PRACTICES FOR ENSURING QUALITY?

We must treat our products as if they will be used to treat our own friends and families. Many laws and regulations govern our products. We must be familiar with these in relation to our roles as part of the Integra team. Here are some key areas of compliance:

- Good manufacturing practices (GMPs)
- Quality system regulations (QSRs)
- Good laboratory practices (GLPs)
- Good tissue practices (GTPs)
- Guidelines for clinical studies





# We Embrace Diversity and Inclusion

## What We Stand For

We do our best work as a team when we make sure unique experiences and ideas are heard and leveraged. As a global company, diversity and inclusion is critical to our success.

## Why It Matters

Our customers and partners, as well as the patients they serve, are a diverse group. When we include diverse backgrounds in our decision-making, we better serve those customers and partners.

## How We Do the Right Thing

We embrace diversity and inclusion when we:

- Build our teams to be diverse
- Actively seek out diverse points of view
- Listen to all perspectives with respect
- **Speak up** when we feel our voices or the voices of others are being disrespected



## RESOURCES

Diversity and Inclusion Website

# We Prevent Harassment and Discrimination

## What We Stand For

Our teams thrive in an environment of respect and dignity. We do not tolerate harassment or discrimination of any kind.

## Why It Matters

To achieve excellence through teamwork, we must be as respectful as we are inclusive. No employee should feel harassed or discriminated against. This undermines their dignity and our integrity.

## How We Do the Right Thing

To prevent harassment and discrimination, we:

- Treat others fairly and focus on the skills they bring to Integra
- Use only merit and performance for decisions on hiring, training, discipline, and promotion
- Do not discriminate on the basis of protected characteristics  
These can include:
  - Race
  - Color
  - Gender
  - Religion
  - Age
  - National origin
  - Sexual orientation
  - Disability
  - Military or veteran status
  - Marital status
  - Any other characteristic protected by law
- Do not say or do anything that others may find offensive
- [Speak up](#) if we see harassment or offensive conduct



## WHAT IS HARASSMENT?

What do we mean by *harassment*, and how do we recognize it? Harassment is defined as any unwelcome conduct. It can include acts that shame people based on their identity, as well as sexual conduct. The following are all examples of harassment:

- Derogatory comments
- Making comments about someone's body
- Inappropriate physical contact
- Offering work opportunities in exchange for sexual favors
- Using degrading words to describe someone
- Sharing or displaying any obscene content in any format (such as email, voicemail, video, etc.)
- Making sexual or offensive jokes

Remember that harassment can come in many forms. It can be in what we say or write, such as a lewd joke. It can be in what we do, such as an unwanted advance. And it can be in what we show or display, such as an image on a screen. The issue isn't what we intend with our actions but how others perceive them.



## RESOURCES

Anti-Harassment Policy  
Integra - Technology Acceptable Use Policy

# We Safeguard Personal Data

## What We Stand For

We build trust when we protect personal data. This applies to employee data as well as data we gather from customers and partners. Protecting this data is required by our key value of Integrity and reinforced by our faith in our people.

## Why It Matters

As employees of a healthcare company, we sometimes encounter personal information when we do our jobs. Much of this information is sensitive and protected by law. To maintain our partnerships and commitment to excellence, we must preserve trust with all types of stakeholders. This can only be achieved when we safeguard the data we gather—from our employees, our partners, our customers, and patients.

## How We Do the Right Thing

We safeguard personal data when we:

- Follow applicable privacy and data protection laws
- Maintain and continuously improve our processes to protect personally identifiable information (PII) and patient healthcare information (PHI)
- Access and use PII and PHI only for business purposes and within the law
- Ensure PII and PHI are protected when we gather, use, retain, and destroy data
- Never share PII and PHI with anyone, inside or outside the company, except those with a business need and in accordance with the law and policy
- Immediately notify colleagues and managers of any data breach



## WHAT IS PERSONAL INFORMATION IN HEALTHCARE?

Personal information is any data that can be used to identify a person. It can take many forms, especially in a healthcare setting. Examples include, but are not limited to, the following:

- |  |  |
|--|--|
| • Name   | • Medical history                                |
| • Date of birth                                | • Clinical trial information                     |
| • Place of birth                               | • Patient healthcare                             |
| • ID number (employee, government, or patient) | information (name, gender, height, weight, etc.) |
| • Email address                                |  |
| • Home address                                 |  |



# We Safeguard Personal Data *(continued)*



## WHAT IS A PERSONAL DATA BREACH?

Sometimes personal data is accessed by people not allowed to see or use it. This is known as a *personal data breach*. Such a breach can result in data loss, change, or misuse of personal data. Any access to personal data must be in accordance with our business processes and only by people with an approved business purpose.

Examples of personal data breaches include the following:

- Someone unauthorized gets access to personal data.
- PII or PHI is sent to the wrong person.
- A laptop or other device containing PII or PHI is lost or stolen.
- PII or PHI is changed without permission.
- Someone with approved access to PII or PHI loses it without explanation.

If you become aware of a personal data breach, take action. Contact the Global IS Security team and the Global Compliance Department if PII or PHI has been disclosed.



## RESOURCES

Data Classification Matrix and Handling Guide  
GDPR Website Policy  
Integra Employee Personal Data Privacy Policy  
Integra Cross Border Transfer Policy  
Data Security Policy

We Do  
What's  
Right  
for Our  
Customers



# We Prevent Bribery and Corruption

## What We Stand For

We win business based on the quality of our products and the dedication of our people. We never offer anything of value to anyone in exchange for business.

## Why It Matters

Bribery and corruption have no place in our business. They harm communities and put our company and our reputation at risk, as bribery is illegal almost everywhere. Violations can result in substantial fines and even prison time for the individuals involved.

## How We Do the Right Thing

To fight bribery and corruption, we:

- Never offer, promise, or give anything of value to a government official, healthcare professional, or anyone else in order to gain a business advantage
- Do not use a third party to make improper payments
- Follow Integra's Global Travel and Expense Policy
- Record all payments and expenses accurately and completely
- [Speak up](#) if we observe or suspect bribery or corruption



## FORMS OF CORRUPTION

**Bribe** – A payment offered in exchange for a favor or preferential treatment

**Kickback** – A payment made to someone for arranging or enabling a business transaction

**Facilitating, or grease, payment** – An off-the-books payment made to an individual to expedite a permit, product registration, or other routine government action



## RESOURCES

International "Outside U.S." Anti-Corruption Policy  
Global Travel and Expense Policy



# We Prevent Bribery and Corruption *(continued)*



## WHO ARE GOVERNMENT OFFICIALS?

Remember that special rules apply when dealing with government officials. Government officials include:

- Any officer or employee of a government- or state-owned department, agency, institution, or commercial enterprise
- Representatives of public (quasi-governmental) international organizations
- Healthcare professionals (HCPs) in places where healthcare organizations (HCOs) are run in whole or in part by a government entity



## EXAMPLES OF “ANYTHING OF VALUE”

- Cash or cash equivalents
- Loans or cash advances
- Gifts, entertainment, hospitality, or meals
- Travel expenses
- Offers of a job or educational opportunities
- Charitable contributions



# We Give and Receive Gifts and Entertainment Responsibly

## What We Stand For

We do business with partners around the world. Those relationships must be built and maintained with integrity. We never give or receive gifts in a way that may affect—or appear to affect—our judgment.

## Why It Matters

In pursuing our business, it is at times appropriate to give and receive modest gifts or share in entertainment. But we can never allow the exchange of gifts and entertainment to affect our business decisions. The focus must always be on the value we create for our business.

## How We Do the Right Thing

To make sure we give and receive gifts and entertainment the right way, we:

- Never give or accept cash or cash equivalents (e.g., gift cards)
- Never ask for gifts or hospitality
- Only accept gifts that are:
  - nominal in value
  - provided on an infrequent basis
  - legal and within company policy
- Document any gifts we receive
- Never accept gifts or hospitality that may affect—or appear to affect—judgment in a business decision (e.g., gifts offered from competing partners)



### WHAT ARE ACCEPTABLE GIFTS?

Always be careful when offered gifts or hospitality. Some acceptable gifts are:

- Local souvenirs of nominal value
- Fruit baskets or other food gifts of nominal value
- Holiday ornaments of nominal value
- Corporate logo items (e.g., pens, mugs, etc.)

# We Give and Receive Gifts and Entertainment Responsibly *(continued)*



## HEALTHCARE PROFESSIONALS (HCPs) AND HEALTHCARE ORGANIZATIONS (HCOs)

As a world leader in medical technology, we do business with HCPs and HCOs on a regular basis. Specific rules apply when pursuing this business. These rules can vary in different countries. We want to provide items that benefit patients, save time, and do what's right. But we must be sure these are allowed under applicable laws and codes.

We need to follow our local policies and procedures for interactions with HCPs and HCOs, including what is permitted for gifts. Gifts to HCPs shall be minimal and primarily benefit patient care (i.e., **either educational or for patient benefit**). “Minimal” means that an individual gift may not have a fair market value of more than \$100 and that the maximum dollar value of gifts that may be given may not total more than \$300 in a calendar year per recipient.



### RESOURCES

- Global Travel and Expense Policy
- Global Policy for Engaging HCPs as Consultants
- AdvaMed Code of Ethics
- MedTech Europe Code of Ethical Business Practice
- EMEA Guidelines for Managing Events and Related Hospitality
- Regional and Local Code of Ethics
- Healthcare Professional Travel and Lodging Policy

# We Compete Honestly and Fairly

## What We Stand For

We win business through our commitment to excellence. We never cut corners or violate laws to gain an advantage in the marketplace.

## Why It Matters

Laws that ensure fair competition—such as antitrust laws—lead to better business for all. We follow these laws because it is the right thing to do, and because our partners and customers count on us to be the best at what we do.

## How We Do the Right Thing

We compete honestly and fairly when we:

- Always deal fairly with all parties
- Never discuss pricing, contracts, or how we divide markets with competitors
- Never make false claims about our competitors
- Refuse to participate in anti-competitive practices, such as price fixing and bid rigging
- Report to the Chief Compliance Officer any attempts made by competitors to make illegal agreements
- Seek advice from the Law Department if we are unsure about a situation with a competitor



## COMPETITIVE INTELLIGENCE

Our people and our teams are always seeking ways to achieve excellence. At times we need to learn about our competitors and the marketplaces where we do business. It is part of how we embrace change. To do so with integrity, we:

- Use publicly available information
- Follow all confidentiality and nondisclosure agreements
- Never ask competitors or customers for confidential information
- Respect all intellectual property rights
- Never ask former employees to share confidential information



# We Market Our Products Honestly

## What We Stand For

We deliver high-quality products that save lives. We take pride in our mission, and we are never dishonest about our products.

## Why It Matters

Our relationships with our partners and customers depend on our commitment to quality. They trust us to be honest about what we provide.

## How We Do the Right Thing

To market our products honestly, we:

- Follow all laws and policies in our product labels, advertising, and marketing
- Make truthful claims about our products using data
- Never suggest off-label or unsafe use of our products
- Share truthful information about reimbursement and health economics for our products
- Never make false claims about our competitors or their products



### RESOURCES

Quality Policy  
AdvaMed Code of Ethics



# We Comply with International Trade Laws

## What We Stand For

We deliver our products when and where our customers need them. In so doing, we follow all trade laws, wherever we do business.

## Why It Matters

As a global company with a range of products, we are subject to trade laws in many countries. These laws are complex and varied. To serve our customers and save them time, we must know these laws and follow them. Our mission depends on it.

## How We Do the Right Thing

We comply with international trade laws when we:

- Perform due diligence for all third parties we do business with
- Know the import and export requirements for our products and services
- Never allow products to be sent to a destination other than the one intended
- Contact the Law Department if ever asked to participate in a prohibited boycott
- Keep accurate records of all imports and exports for customs officials



## RESOURCES

Home - Trade Compliance ([integralife.com](http://integralife.com))

# We Ensure Our Suppliers Uphold Our High Standards

## What We Stand For

We do what's right. This means our suppliers must adhere to standards as high as our own. Our partners help us create value, and they must share our integrity.

## Why It Matters

We count on our partners to help us deliver life-saving products. Our values of integrity and excellence must flow through our supply chain. We can be held accountable for suppliers that break laws. We must choose our suppliers carefully and center quality in our processes. Our customers rely on it.

## How We Do the Right Thing

To ensure that our suppliers uphold our high standards, we:

- Choose suppliers with an open and fair process based on business needs and qualifications
- Share our values with our suppliers and what we expect of them
- Report any concerns about supplier behavior to the Chief Compliance Officer
- Never work with a supplier we have not approved internally
- Communicate openly and honestly with suppliers to address concerns



## RESOURCES

Code of Conduct for Business Partners

We Do  
What's  
Right  
for Our  
Company





# We Avoid Conflicts of Interest

## What We Stand For

Our people are our strength, and we work together as a team. We never allow conflicts of interest to affect our judgment. We avoid even the appearance of such conflicts.

## Why It Matters

As a team, we put the company first. This means making business decisions that are in the best interests of the company. Conflicts of interest, which put self-interest ahead of company interests, should never be tolerated. Our reputation for integrity depends on it.

## How We Do the Right Thing

We avoid conflicts of interest when we:

- Never allow our personal relationships to affect our judgment
- Share with the Law Department any conflict of interest we think we may have
- Never use company information for personal gain
- Remove ourselves from conflict-of-interest decision-making processes that involve us
- Never represent the company in a dealing where we have a personal stake
- Never accept gifts from a partner during a negotiation (see also [We Give and Receive Gifts and Entertainment Responsibly](#))



### ASK YOURSELF ...

To help decide if you have a conflict of interest, ask yourself these questions:

- Am I doing something that gets in the way of my job at Integra?
- Am I doing something that will bias my decisions?
- Am I using Integra assets outside of their main purpose?
- Will I or a family member get something of value based on my role at Integra?
- Might someone else see a conflict of interest?
- Would Integra's reputation be harmed if this were made public?



#### RESOURCES

Conflict of Interest and Employment of Relatives Policy



# We Avoid Conflicts of Interest *(continued)*



## WHAT IS A CONFLICT OF INTEREST?

We all play a role at the company. At times, our personal interests can come into conflict with this role. These interests can involve a family member (who may want to contract with Integra) or an outside business interest (such as a personal consulting job). Consider these examples:

- **Personal relationship:** Your brother works for one of our suppliers; you happen to negotiate with that supplier.
- **Outside activity:** You take a part-time job outside Integra. Your work at Integra begins to suffer as a result.
- **Use of company assets:** You have an idea for a product outside of Integra's business. You use company computers and data to develop your idea.
- **Financial interest:** You own stock in a business that competes with Integra.
- **Business opportunity:** A supplier has offered you a deal that it has not offered Integra.
- **Accepting a gift:** You accept a gift card from a customer while discussing prices.

All these situations can happen. Report to a manager or the Law Department if you think you may be in conflict with the company. It's the best way to protect yourself and Integra.

# We Safeguard Confidential and Proprietary Information

## What We Stand For

To best serve customers with quality products, we protect the company's vital business interests. This includes the protection of its confidential and proprietary information.

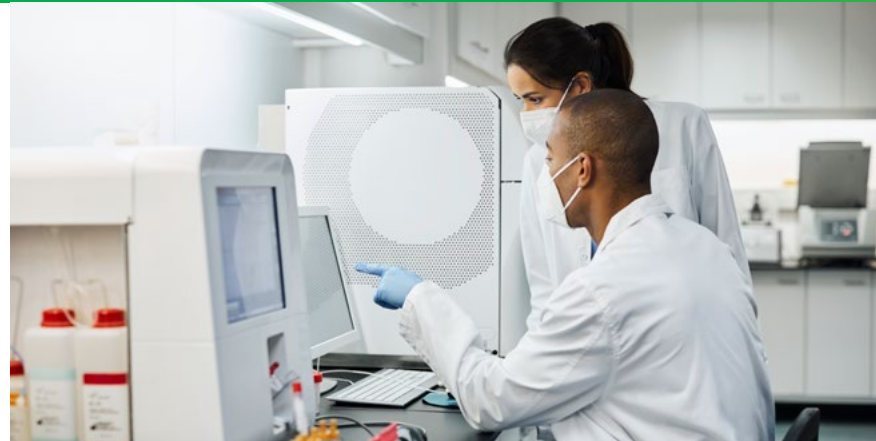
## Why It Matters

Information is a cornerstone of our business. Our proprietary information, including trade secrets, sets us apart from competitors so we can provide innovative and quality products to better serve our customers.

## How We Do the Right Thing

To safeguard confidential and proprietary information, we will:

- Not share proprietary information—even within the company—unless authorized
- Not discuss confidential matters in public places (e.g., elevators, trains, restaurants)
- Secure all confidential information with effective measures (e.g., locks and passwords)
- Not leave confidential information where it is easy to see (e.g., an open laptop in a café)
- Only allow visitors into nonrestricted areas
- Report to a manager or the Law Department any possible breaches in security



## WHAT IS CONFIDENTIAL INFORMATION?

Confidential and proprietary information can take many forms. Consider these examples:

- Product designs and chemical formulas
- Trade secrets and unpublished patent applications
- Nonpublic financial information, such as pricing, projections, and financial results
- Marketing, sales, and business plans
- Supplier and customer lists
- Research and development information and ideas
- Manufacturing processes
- Procurement and contractual information
- Information related to acquisitions, investments, and divestitures
- Attorney work products and legal opinions



### RESOURCES

Integra Information Security Policy  
Integra - Technology Acceptable Use Policy  
Mobile Device Policy  
Integra Employee Personal Data Privacy Policy  
Integra Cross Border Transfer Policy

# We Protect Our Information Systems

## What We Stand For

Our information systems are what we use to get our jobs done. We protect these systems so we can pursue our business goals.

## Why It Matters

Just as protecting intellectual property is key to our business, so too is protecting our information systems. These are the devices and systems we use to develop and share business information. We build trust when we recognize the sensitivity and value of these systems, as well as the data they transmit.

## How We Do the Right Thing

We protect our information systems when we:

- Ensure that only authorized users have access to our devices, applications, and data
- Provide only the appropriate access needed to do the job
- Protect user IDs and passwords, change them regularly, and keep them confidential
- Keep company devices safe and secure at all times and in all places
- Do not open suspicious or inappropriate emails or links
- Report suspicious activities that relate to our technology and data



### RESOURCES

Data Security Policy  
Mobile Device Policy  
Integra Information Security Policy  
Integra - Technology Acceptable Use Policy  
Integra - Cloud Computing Policy  
GDL - Data Handling

# We Guard Our Company Assets

## What We Stand For

As a global company, we have a variety of assets, both tangible and intangible. These assets are the building blocks of our company and our future. We must keep them safe to serve our customers.

## Why It Matters

Our assets are the sum total of all we own. Integra has built these assets over time and through the hard work of our team. They have strategic value; we use them to do business, and using them wisely helps us achieve growth in the long term.

## How We Do the Right Thing

To guard our company assets, we:

- Ensure that company assets are not damaged, abused, lost, or stolen
- Always handle company funds honestly and in line with our policies
- Never leverage company assets for personal use
- Never allow unauthorized people—including friends and family—to use company assets
- Report any misuse of company assets to the Chief Compliance Officer



## WHAT ARE COMPANY ASSETS?

Integra assets come in many forms. These include the following:

- **Physical assets:** land, buildings, furniture, office supplies, machinery, electronic devices, vehicles, and documents
- **Electronic assets:** all data in our systems and servers
- **Financial assets:** money, stocks, bonds, loans, and deposits
- **Information assets:** business information, documents, materials, and data
- **Intangible assets:** goodwill, brand recognition, and intellectual property, such as trade secrets, patents, trademarks, and copyrights



### RESOURCES

Integra - Technology Acceptable Use Policy  
Integra Employee Personal Data Privacy Policy  
Data Security Policy



# We Do Not Engage in Insider Trading

## What We Stand For

We never use or share material, nonpublic information for the purposes of insider trading. Our integrity demands that we never seek personal gain this way.

## Why It Matters

Insider trading is a serious violation that comes with serious penalties. These can include loss of employment, fines, and even jail time. Insider trading is unfair and distorts markets. It can also do serious harm to our reputation. We cannot lose the trust of our customers and their patients.

## How We Do the Right Thing

To ensure we do not engage in insider trading, we:

- Keep inside information from being released or shared
- Share inside information with co-workers on a need-to-know basis only
- Never buy Integra shares or any other shares on the basis of inside information
- Never engage in “tipping,” or sharing inside information with others so they can profit from it
- Never spread false information to manipulate share prices



## WHAT IS INSIDER TRADING?

Insider trading happens when someone buys or sells stocks based on inside information. Inside information is often referred to as “material, nonpublic information.” If someone shares inside information with someone else so that they can buy or sell stocks, that is also insider trading.

Some types of company knowledge might be useful to an investor when deciding to buy or sell stocks or securities. This is known as **material information**.

**Nonpublic information** is knowledge that only people within the company are aware of. Such information is considered public following the second full business day after it has been released to the market.

Here are some examples of inside information:

- Changes in management
- Significant product events such as launches and recalls
- Government investigations
- Market strategies
- Financial projections, forecasts, and results
- Stock splits or repurchases that have not been announced
- Plans for mergers, acquisitions, joint ventures, and divestitures
- Changes in dividend policies



## RESOURCES

Insider Trading Policy – General  
Insider Trading Policy – Window Group

# We Keep Accurate Accounts and Records

## What We Stand For

We need confidence to make good decisions and drive action. Keeping accurate accounts and records gives us that confidence. It is also the right thing to do.

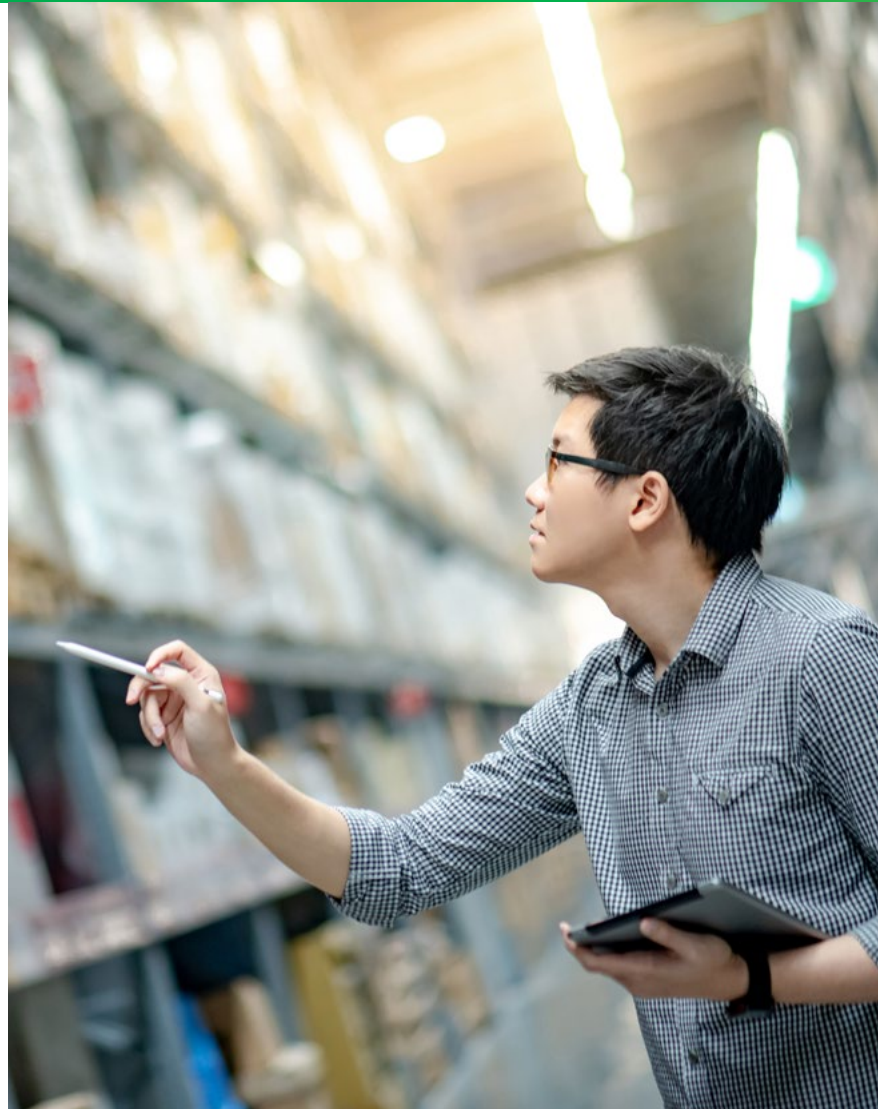
## Why It Matters

Integra is a publicly traded company. We therefore have an obligation to our shareholders to accurately present our financial information as regulated by the Securities and Exchange Commission (SEC). We also communicate with the public through press releases and presentations. Accurate records in such communications help us maintain trust with our partners and customers. They also support our decisiveness in executing business transactions.

## How We Do the Right Thing

To keep accurate accounts and records, we:

- Comply with generally accepted accounting principles, our own controls, and all relevant laws and regulations
- Maintain books, expense reports, and receipts that honestly reflect financial transactions
- Never mislead or exaggerate about our finances
- Record all business transactions completely, accurately, in the proper period, and in a timely manner
- Submit all records to internal and external auditors in a timely manner



# We Communicate Clearly and Professionally

## What We Stand For

As one team, we speak with one voice. We speak with respect and we tell the truth. Clear and professional communication serves our business interests.

## Why It Matters

Our reputation for excellence has been built by treating our partners and customers with respect and doing the right thing. This means talking about our company in ways that are both positive and honest. We must also take care not to mislead our partners and customers, or lose their trust. This is why some roles at Integra are dedicated to communicating to external stakeholders of the company.

## How We Do the Right Thing

To make sure we communicate clearly and professionally, we:

- Refer all external questions to Corporate Communications and the Public Relations team
- Inform Corporate Communications and the Public Relations team if we find any information about our company that is wrong
- Never share personal opinions about Integra, our business partners, or our customers





# We Use Social Media Responsibly

## What We Stand For

Social media is a powerful tool. We embrace how it allows us to build connections and share points of view. We are also careful to never use social media to harm the company.

## Why It Matters

Integra can harness social media to have direct, honest, and meaningful interactions with our stakeholders. However, online exchanges can also be taken out of context or misunderstood. To protect our reputation, we must take care with what we post.

## How We Do the Right Thing

We use social media responsibly when we:

- Uphold our values and policies when we post
- Report to Corporate Communications any negative posts about Integra
- Never post anything negative ourselves about Integra
- Never represent our own views as those of the company
- Never disclose confidential information



# We Interact with Healthcare Professionals Responsibly

## What We Stand For

Because we believe surgery is a blend of art and science, we engage healthcare professionals (HCPs) as part of our business. HCPs help us better understand their patients and fulfill our commitment to quality in all we do. We uphold the highest ethical standards in all our dealings with HCPs.

## Why It Matters

Our interactions with HCPs are governed by law, industry standards, and our own policies. Violations of any of these can lead to serious consequences. We must build collaborative relationships with HCPs based on trust, our mission, and our values. This will ensure our business thrives—and that we improve patients' lives.

## How We Do the Right Thing

To interact with HCPs according to the highest ethical standards, we:

- Only engage with HCPs for a legitimate need
- Choose only qualified HCPs for those needs
- Ensure that clinical studies and research always meet the highest ethical, medical, and scientific standards
- Ensure that factors related to working with an HCP (e.g., location, meals, travel, and payment) are strictly aligned to our Global Policy for Engaging HCPs as Consultants
- Never work with an HCP without a written agreement
- Never interfere with an HCP's independent medical judgment
- Never attempt to reward HCPs for choosing, leasing, or recommending our products

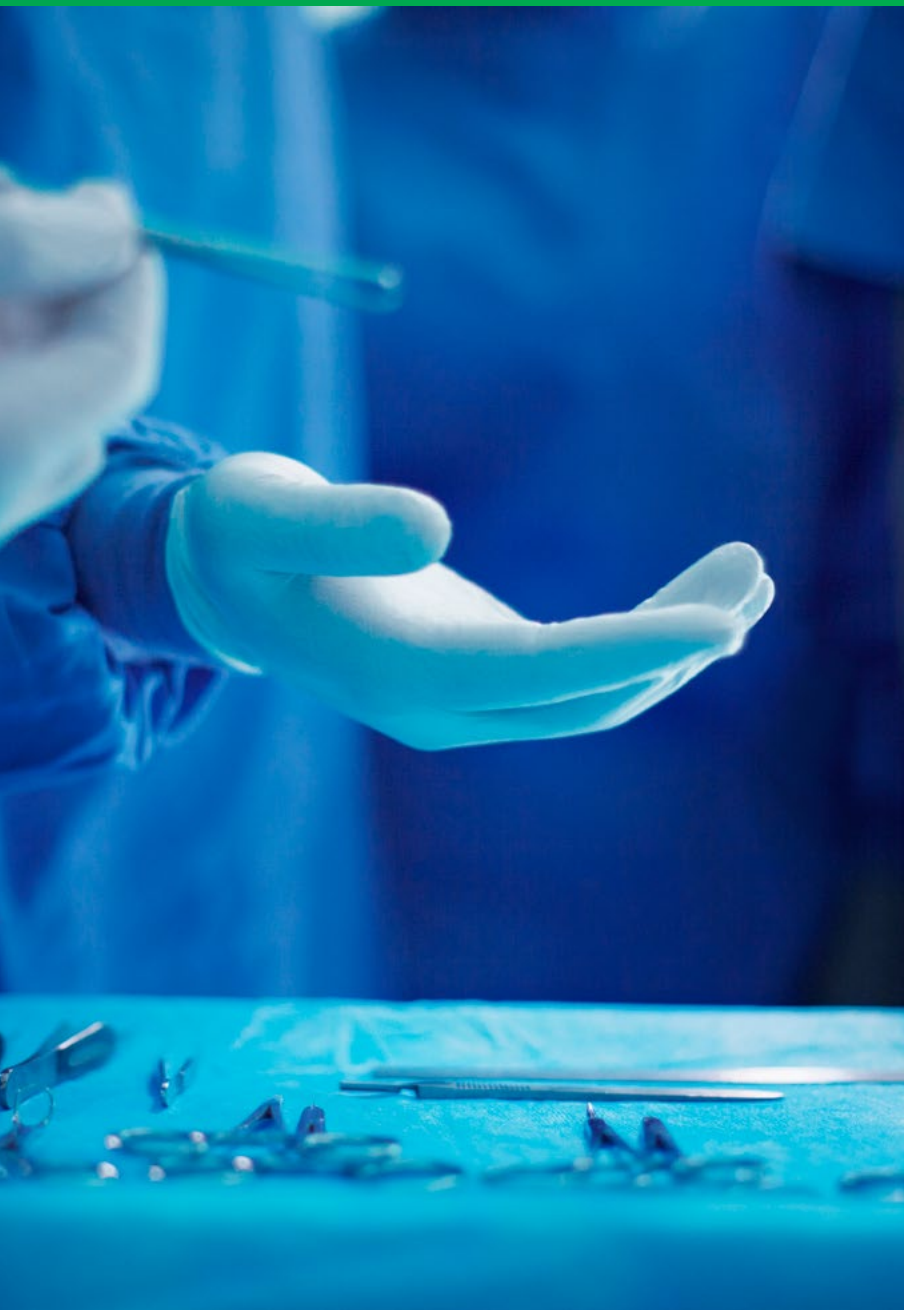


## COLLABORATING WITH HCPs

We collaborate with HCPs because it helps us achieve our mission. We must always do so ethically. Some ways we collaborate are as follows:

- Developing and improving products
- Conducting clinical studies and research
- Speaking at engagements
- Training and educating on the safest, most effective ways to use our products
- Holding advisory panel meetings
- Holding scientific meetings

# We Interact with Healthcare Professionals Responsibly *(continued)*



## ITEMS PROVIDED TO HCPs

We must be careful about the items we provide to HCPs because they may be seen as inappropriate. (See [We Prevent Bribery and Corruption](#) and [We Give and Receive Gifts and Entertainment Responsibly](#).)

We never try to win favorable treatment from an HCP through anything we may provide free of charge.

Before we offer an HCP use of any of our products, we must first make sure they are allowed under the country's law and industry code. Any provided item must benefit patients or serve a genuine educational function. Never give HCPs gifts such as cookies, wine, food baskets, gift cards, or cash, for any reason. And never pay for an HCP's entertainment or personal travel.



## RESOURCES

- Global Policy for Engaging HCPs as Consultants
- Policy on Interaction with Healthcare Professionals
- AdvaMed Code of Ethics
- MedTech Europe Code of Ethical Business Practice
- EMA Guidelines for Managing Events and Related Hospitality
- Regional and Local Code of Ethics
- Healthcare Professional Travel and Lodging Policy



We Do  
What's Right  
for Our  
Communities



# We Respect Human Rights

## What We Stand For

We believe people are our greatest asset. It follows that we respect the human rights of all people across the globe. We expect the same of our business partners.

## Why It Matters

Our integrity makes us a responsible corporate citizen. As such, we value human dignity and protect human rights in all we do. We have no tolerance for human trafficking, slavery, or child labor. These practices have no place in a fair and safe marketplace. By doing the right thing, and expecting the same of our partners, we improve the quality of business for all.

## How We Do the Right Thing

To respect and protect human rights, we:

- Follow all Integra human rights policies
- Provide safe and proper working conditions to all employees
- Compensate all employees and partners fairly
- Only partner with suppliers that follow labor laws
- Report any human rights concern to a supervisor or the Chief Compliance Officer



### RESOURCES

UK Modern Slavery Statement  
Conflict Minerals Policy  
Code of Conduct for Business Partners  
ESG Report  
Integra Labor & Human Rights Statement: Our Commitment



## THE SCOPE OF HUMAN RIGHTS

To protect human rights, and to ensure the health of our company culture, we are committed to a number of practices in all we do. These include:

- Keeping workplaces safe and healthy
- Never using child labor
- Never using forced or indentured labor
- Never discriminating in our hiring practices
- Prohibiting all forms of harassment, abuse, and threatening behavior
- Supporting the freedom of workers to associate
- Supporting the freedom of workers and employees to bargain collectively

# We Contribute to Our Communities

## What We Stand For

Our commitment to limiting uncertainty goes beyond the walls of the operating room. We believe in supporting the communities where we live and work—and in making the world a better place.

## Why It Matters

As a company in the healthcare space, we help to improve patients' lives. Those same patients live and work in our communities. We further our mission when we contribute to those communities—through volunteer work, philanthropy, and charitable giving. We also enhance Integra's reputation by showing that we live our values.

## How We Do the Right Thing

To best contribute to our communities, we:

- Volunteer locally and around the world
- Support causes that increase health and well-being, and that are in line with our mission
- Never pressure others to get involved in causes if they don't want to
- Keep records of all charitable contributions
- Always get approval before donating on behalf of the company
- Never provide grants or donations to HCPs for any reason
- Never provide grants or donations to influence others to buy, lease, or recommend Integra products



### THE INTEGRA FOUNDATION

Since 2002, the Integra Foundation has been improving people's lives. The foundation focuses on medical education in a number of areas. These include wound care, neurosurgery, and regenerative medicine. The foundation has given millions of dollars in grants to 501(c)(3) organizations. These efforts are another way Integra makes a difference in people's lives.





# Conclusion and Resources



# Closing Words

We built this company knowing that our people are our greatest asset. By hiring the right people, in the right way, we strengthen our team. Working together in accordance with our values keeps us at our best—so we can innovate new treatment pathways to advance patient outcomes and set new standards of care.

Thank you for reading our Code of Conduct. Keep it as a resource to guide you in upholding our high standards with integrity.



# Resources and Contacts

## Within the US

To report a compliance concern in the US, use one of the following:

- The Integra intranet site
- Public Internet:
  - Go to [www.integralife.com/ethicspoint](http://www.integralife.com/ethicspoint)
  - Follow the directions for “To File a Report”
- Toll-Free Phone:
  - Call 1-888-279-6256
  - Someone will assist you

## Outside the US

To report a compliance concern outside the US, use one of the following:

- Public Internet:
  - Go to [www.integralife.com/ethicspoint](http://www.integralife.com/ethicspoint)
  - Follow the directions for “To File a Report”
- Toll-Free Phone:
  - Call 1-888-279-6256 or go to [www.integralife.com/ethicspoint](http://www.integralife.com/ethicspoint)
  - Select the country where you are located to get the correct phone number

## General

For other questions or concerns, contact:

- Your local management
- Your Human Resources Department
- The Law Department
- Senior executives

You may also contact our Chief Compliance Officer by visiting our [Global Compliance Department website](#).





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