Code of Conduct

Strength through Integrity

December 2025

Table of Contents

A Message from Our CEO . . . 3

A Home for our Values . . . 4

Standing for Our Values . . . 6

Our Code

Employee Responsibilities . . . 8
Additional Responsibilities of Managers . . . 9
Asking Questions and Reporting Concerns . . . 11
What to Expect When You Use EthicsPoint – Speak Up! . . . 11
Our Non-retaliation Policy . . . 12
Accountability and Discipline . . . 12

Serving the Greater Good

Corporate Citizenship . . . 13
Human Rights . . . 13
Conflict Minerals . . . 13
The Environment . . . 14

Promoting a Safe and Respectful Workplace

Diversity and Non-discrimination . . . 15
A Harassment-free CeramTec . . . 16
Health and Safety . . . 17

Protecting Information and Assets

Physical and Electronic Assets . . . 18
Confidential Information and Intellectual Property . . . 19
Intellectual Property . . . 20
Accurate Recordkeeping . . . 22
Communicating on Behalf of CeramTec . . . 25

Honoring Our Responsibility to Others

Fair Dealing with Business Partners . . . 26
Interacting with the Government . . . 28
Conflicts of Interest . . . 28
Gifts, Hospitality and Entertainment . . . 30
Product Safety and Quality . . . 31

Following the Letter and the Spirit of the Law

Anti-corruption and Anti-Bribery . . . 32
Data Privacy . . . 34
Fair Competition . . . 34
Global Trade Compliance . . . 36
Political Activities . . . 37
Insider Dealing . . . 37
Anti-Money Laundering . . . 38

Special Excursus on Meeting Medical Industry Ethics Standards

Ensuring Ethical Interactions with Health Care Professionals . . . 39

A Message from Our CEO

In this era of globalisation, CeramTec is also experiencing constant change. Our world is internationally networked and fast-paced. This makes it all the more important to consider how we interact with each other, as well as with our customers, partners and other stakeholders, in our day-to-day business.

I am convinced that, in many cases, misconduct in a professional context is not intentional. After all, most of us care about belonging to a group and adhering to socially accepted norms and group rules. However, it is important to familiarise yourself with these rules, as not all of them are intuitive.

This is why the CeramTec Group has its Code of Conduct. It provides guidance and helps us to do the right thing. Please read the Code of Conduct carefully and let it guide your actions. If anything is unclear, please ask questions. Be vigilant: do not hesitate to voice your concerns if you notice behaviour that violates our code, our guidelines or the law.

Regardless of your role, area of responsibility or place of work, every decision is made within a network of stakeholders. This network also provides security. Our Code of Conduct is a safety net that helps us uphold our CeramTec values. This is the only way we can ensure our future success. I want to work with all of you to ensure that we not only present our values and rules of ethical business conduct, but also live by them.

Dr. Carla Kriwet
Chief Executive Officer
CeramTec Group

Standing for Our Values

Passion

We are passionate about our people, our customers, our products and are determined to deliver results.

Learn & grow

We achieve growth by learning and developing.

Open & positive mindset

We are open to new ideas and change.

Customer focus

We continuously innovate & improve what we do for our customers and internal partners.

Integrity

We have the highest standards of honesty in everything we do.

Accountability

We take responsibility for our actions.

Teamwork

We are respectful, we value others and together we achieve more.

Our Code

Employee Responsibilities

Each of us must take responsibility for acting with integrity, even when this means having to make difficult choices. Meeting our responsibilities is what enables us to succeed and grow.

- Always act in a professional, honest and ethical manner when acting on behalf of our Company.
- Know the information in the Code and written Company policies and pay particular attention to the topics that apply to your specific job responsibilities.
- Complete all required employee training in a timely manner and keep up-to-date on current standards and expectations.
- Report concerns about possible violations of our Code, our policies or the law to your manager, an executive, or any of the resources listed in this Code.

Know the information in the Code ...

Remember: No reason, including the desire to meet business goals, is ever an excuse for violating our Code, our policies or the law.

Additional Responsibilities of Managers

CeramTec managers are expected to meet the following additional responsibilities:

- **Lead by example.** As a manager, you are expected to exemplify high standards of ethical business conduct.
- **Help create a work environment** that fosters mutual respect and open communication.
- **Be a resource for others.** Be available to communicate with employees, contractors, suppliers and other business partners about how the Code and other policies apply to their daily work.
- **Be proactive.** Look for opportunities to discuss and address ethics and challenging situations with others.
- **Respond quickly and effectively.** When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- **Be aware of the limits of your authority.** Do not take any action that exceeds your authority. If you are ever unsure as to what is appropriate (and what is not), discuss the matter with your manager.
- **Delegate responsibly, to people who deserve your trust.** If you ever have concerns about the integrity of one of your team members, you must report this and act swiftly, and certainly not promote this person by delegating authority to him or her.

Our Code

Facing a Difficult Decision?

It may help to ask yourself:

Is it legal?

Is it consistent with our Code and our Values?

Would I feel comfortable if senior management and others within my Company knew about it?

Would I feel comfortable if my decision or my actions were made public?

If the answer to all of these questions is “yes,” the decision to move forward is probably acceptable, but if the answer to any question is “no” or “I am not sure,” stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

One More Thing …

We value your feedback. If you have suggestions for ways to enhance our Code, our policies or our resources to better address a particular issue you have encountered, bring them forward. Promoting an ethical CeramTec is a responsibility we all share.

Asking Questions and Reporting Concerns

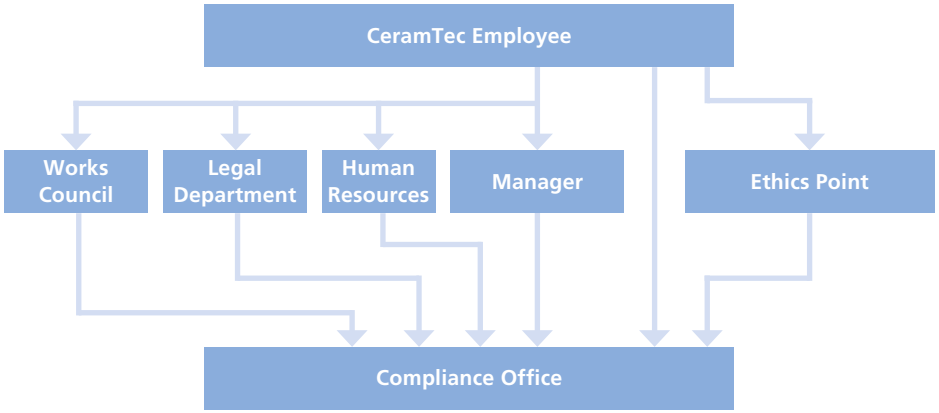
If you see or suspect any violation of our Code, our policies or the law, or if you have a question about what to do, talk to your manager.

If you are uncomfortable speaking with your manager, there are other resources available to help you:

- Contact another member of management.
- Contact the Compliance Office.
- Contact the Legal Department.
- Contact Human Resources.
- Contact EthicsPoint – Speak Up!

ceramtec.ethicspoint.com

CeramTec will make every reasonable attempt to ensure that your concerns are addressed appropriately.



What to Expect When You Use EthicsPoint – Speak Up!

The EthicsPoint – Speak Up! web portal is available 24 hours a day, 7 days a week and operated by an independent third-party provider of corporate compliance services, who will forward a web report to CeramTec for further investigation.

When you contact EthicsPoint – Speak Up!, you may choose to remain anonymous where allowed by local law. All reports will be treated equally whether they are submitted anonymously, or not.

After you make a report, you will receive an identification number so you can follow up on the status of your concern. Following up is especially important if you have submitted a report anonymously, as we may need additional information in order to conduct an effective investigation. This identification number will also enable you to track the resolution of the case; however, please note that out of respect for privacy, CeramTec will not be able to inform you about individual disciplinary actions.

Any report you make will be kept confidential by all individuals involved with reviewing and, if necessary, investigating it.

Remember, an issue cannot be addressed unless it is brought to someone's attention.

Our Code

Our Non-Retaliation Policy

We will not tolerate any retaliation against any employee who asks questions, in good faith makes a report of actions that may be inconsistent with our Code, our policies or the law, or who assists in an investigation of suspected wrongdoing.

Reporting "in good faith" means reasonably believing that an action may constitute a violation of the Code or a regulation or the law, and making a genuine attempt to provide honest, complete and accurate information, even if it later proves to be unsubstantiated or mistaken.

I suspect there may be some unethical behavior going on in my business unit involving my manager. I know I should report my suspicions, and I am thinking about contacting the Chief Compliance Officer, but I'm concerned about retaliation.

Contacting the Chief Compliance Officer is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation very seriously. Reports of retaliation will be thoroughly investigated and, if they are true, retaliators will be disciplined.

We will not tolerate any retaliation ...

Accountability and Discipline

Violating our Code, our policies or the law or encouraging or permitting others to do so, exposes our Company to liability and puts our reputation at risk. If an ethics or compliance problem does occur, you are required to report it so that an effective solution can be found. You should also understand that violations of laws or regulations may have legal consequences, such as penalties or even criminal prosecution.

Serving the Greater Good

Corporate Citizenship

We believe in making a positive difference in people's lives and maintaining the health and welfare of the communities where we live and work. We promote, encourage and support a diverse range of corporate social responsibility activities. You are encouraged to become involved in the many initiatives we support.

We also encourage you to make a difference on a personal level, but, in general, ask that you do so on your own time and at your own expense; make sure that your activities are lawful and consistent with our policies. Unless you receive approval in advance, do not use CeramTec funds, assets or the CeramTec name to further your personal volunteer activities.

Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to child labor, slavery, human trafficking and forced labor. Each of us can help support efforts to eliminate these abuses.

Conflict Minerals

Revenue from conflict minerals has been linked to funding for groups engaged in extreme violence and human rights atrocities. We work closely with suppliers of raw materials, parts and components and communicate our expectation that suppliers and vendors will comply with all applicable laws, including laws aimed at providing conflict-free minerals.

Do the Right Thing

- Report any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners.
- Remember that respect for human dignity begins with our daily interactions with one another and with our business partners. It includes promoting diversity and doing our part to protect the rights and dignity of everyone with whom we do business.

Serving the Greater Good

The Environment

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment as well as any potential harm to the health and safety of employees, customers and the public.

Do the Right Thing

- Do your part to ensure that protecting team member safety and the environment is a priority. Stop work and report any situation that you believe could result in unsafe working conditions or damage to the environment.

Promoting a Safe and Respectful Workplace

Diversity and Non-discrimination

CeramTec helps bring together employees with a wide variety of backgrounds, skills and cultures. Combining such a wealth of talent and resources creates the diverse and dynamic teams that consistently drive our results.

We are committed to the freedom and equality of all human beings without difference of race, color, sex, language, religion, political or other conviction, national or social origin, birth or other status. We show our commitment, by supporting the Universal Declaration of Human Rights of the United Nations and the European Convention for the Protection of Human Rights.

Our colleagues, job applicants and business partners are entitled to respect and should be judged on the basis of their qualifications, demonstrated skills and achievements.

Do the Right Thing

- Treat others respectfully and professionally.
- Promote diversity in hiring and other employment decisions.
- Do not discriminate against others on the basis of any characteristic protected by law or Company policy.

Stay Alert For

- Comments, jokes or materials, including emails, which others might consider offensive.
- Unconscious bias when judging others. If you supervise others, judge them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.

One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your immediate manager or your local Human Resources representative. Sending these kinds of jokes violates our Values as well as our policies that relate to the use of email and our standards on diversity, harassment and discrimination.

Promoting a Safe and Respectful Workplace

A Harassment-Free CeramTec

We all have the right to work in an environment that is free from intimidation, bullying and harassment (including sexual harassment).

We expect all our employees to respect the dignity, privacy and personal rights of every individual at all times. Under no circumstances do we tolerate discrimination, harassment or insults that harass another, disrupts another's work performance or creates an intimidating, offensive, abusive or hostile work environment.

Do the Right Thing

- Help each other by speaking out when a coworker's conduct makes others uncomfortable.
- Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- Promote a positive attitude toward policies designed to build a safe, ethical and professional workplace.
- Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.

Stay Alert For

- Unwelcome remarks, gestures or physical contact.
- The display of sexually explicit or offensive pictures or other materials.
- Sexual or offensive jokes or comments (explicit or by innuendo).
- Verbal abuse, threats or taunting.

Health and Safety

Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others.

We can only achieve our goal of a safe and healthy workplace through the active participation and support of everyone. Situations that may pose a health, safety or environmental hazard should be reported immediately.

Safety is a condition of employment, and we expect the commitment of each director, officer and employee to make CeramTec an accident-free workplace.

Do the Right Thing

- Observe all safety, security and health rules and practices, in particular those that apply to your job.
- Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- Maintain a neat, safe working environment by keeping workstations, aisles and other workspaces free from obstacles, wires and other potential hazards.

Stay Alert For

- Unsafe practices or work conditions.

I have noticed some practices in my area that do not seem safe. Who can I speak to? I am new here and do not want to be considered a troublemaker.

Discuss your concerns with your manager or Human Resources. There may be very good reasons for the practices, but it is important to remember that raising a concern about safety does not make you a troublemaker, but a responsible employee concerned about the safety of others.

Think ahead and work according to guidelines

Look out for colleagues and new team members

Always use the correct personal protective equipment

Walk calmly on walk ways/ stairs and use handrails

Keep the workplace clean and tidy, then its's safer

Protecting Information and Assets

Physical and Electronic Assets

We are entrusted with Company assets and are personally responsible for protecting them and using them with care. Company assets include funds, facilities, equipment, information systems, intellectual property and confidential information.

Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and must not have an adverse effect on productivity and the work environment.

Do the Right Thing

- Do not use CeramTec equipment or information systems to create, store or send content that others might find offensive.
- Do not share passwords or allow other people, including friends and family, to use Company resources.
- Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on Company computers or other equipment to conduct Company business is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Department.

Stay Alert For

- Requests to borrow or use CeramTec equipment without approval.
- Unknown individuals without proper credentials entering our facilities.
- Excessive use of Company resources for personal purposes.

Confidential Information and Intellectual Property

CeramTec commits substantial resources to technology development and innovation. The creation and protection of our intellectual property rights are critical to our business. Intellectual property includes items such as proprietary confidential information, trade secrets, trademarks and patents.

Each of us must be vigilant ...

Each of us must be vigilant and protect CeramTec confidential information and intellectual property. This means keeping it secure, limiting access to those who have a need to know in order to do their job and only using it for authorized purposes. Our customers, business partners and others place their trust in us, and we have a duty to protect their confidential information as well.

Be aware that the obligations to protect CeramTec confidential information and to restrict your use of CeramTec confidential information and intellectual property continues even after employment ends.

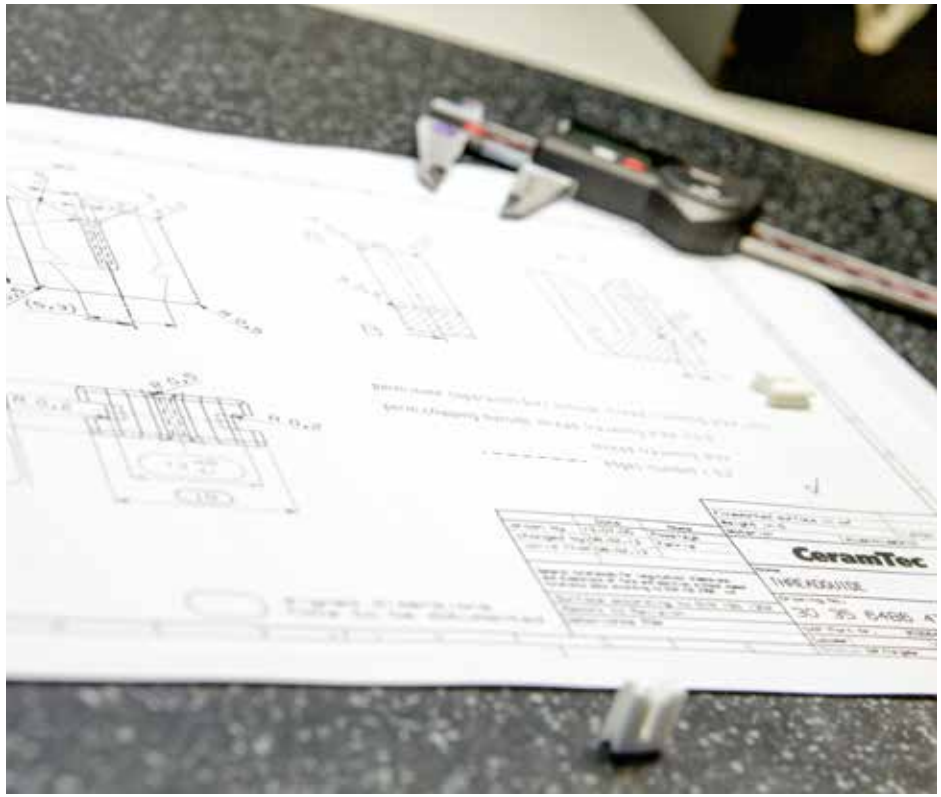
Do the Right Thing

- Before we pass on or receive confidential information, we will enter into an agreement with the relevant third party specifying how and under what conditions the information may be lawfully used.
- Use and disclose confidential information only for legitimate business purposes.
- Protect our intellectual property and confidential information by sharing it only with authorized parties.
- Only store or communicate Company information using CeramTec information systems.

Protecting Information and Assets

Stay Alert For

- Discussions of CeramTec confidential information in places where others might be able to overhear – i.e., anywhere outside of Company premises, for example on planes and elevators and when using mobile phones.
- Sending confidential information to unattended fax machines or printers.



Intellectual Property

Intellectual property (IP) is an important asset that must be protected. Examples of our IP include:

- **Business and marketing plans**
- **Company initiatives (existing, planned, proposed or developing)**
- **Customer lists**
- **Methods, processes, know-how and techniques**
- **Innovations and designs**
- **Systems, software and technology**
- **Patents, trademarks and copyrights**
- **Other forms of proprietary information, such as trade secrets and discoveries**

Contact the Legal Department if you receive any statements or questions from third parties regarding (1) the scope of CeramTec IP rights, (2) the applicability of CeramTec IP rights to another company's products or (3) the applicability of a third party's IP rights to CeramTec intellectual property rights or products.

Immediately report to your manager any inventions or other intellectual property rights that you create while working for CeramTec.

Do the Right Thing

- Understand the expectations of customers and business partners regarding the protection, use and disclosure of the confidential information to which they give us access.
- Limit any access to third-party confidential information to those persons who have a need to know in order to do their job, and only for authorized purposes.
- Immediately report to your manager any loss or theft of confidential information.

Stay Alert For

- Requests by business partners for confidential information about our customers or about other business partners if there is no associated business requirement or authorization.
- Unintentional exposure of confidential information about our customers or business partners in public settings or through unsecure networks.

Protecting Information and Assets

Accurate Recordkeeping

The accuracy and completeness of our disclosures and business records is essential to making informed decisions and meeting our legal obligations. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have special responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure reports or disclosures about our financial records are full, fair, accurate, complete, objective and timely and never falsify or mischaracterize any book, record, account, entry or transaction.

Records Management

Documents should only be disposed of in compliance with CeramTec policies and should never be destroyed or hidden. You must never conceal wrongdoing or permit others to do so. Never destroy or alter documents in response to – or in anticipation of – a litigation proceeding, an investigation, or an audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the Legal Department.

Do the Right Thing

- Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- Write carefully in all of your business communications. There is no place in Company communications for emotions or gratuitous general statements. Write as though someday the records you create may become public documents.

Stay Alert For

- Records that are not clear and complete or that obscure the true nature of any action.
- Undisclosed or unrecorded funds, assets or liabilities.
- Improper destruction of documents.

At the end of the last quarter reporting period, my manager asked me to record additional expenses, even though I had not yet received the invoices from the supplier and the work has not yet started. After some reflection, I did do so, since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

No, you did not. Costs must be recorded in the period in which they are incurred. The work was not started, and the costs were not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.

Protecting Information and Assets

Communicating on Behalf of CeramTec

We are committed to maintaining honest, professional and lawful internal and public communications.

We need a consistent voice when making disclosures or providing information to the public. For this reason, it is important that only authorized persons speak on behalf of CeramTec. Communications with media, analysts and other members of the financial community must be referred to executive management.

We need a consistent voice ...

Stay Alert For

- Employees of the Company giving public speeches, writing articles for professional journals or other public communications that relate to CeramTec without appropriate management approval.
- Only use your title or affiliation in the context of your work for CeramTec.
- Inquiries from journalists or even invitations to speak "off the record" to journalists or analysts who ask you for information about CeramTec or its customers or business partners.

Be careful when writing communications that might be published online. If you participate in internet discussion groups, chat rooms, bulletin boards, blogs, social media sites or other electronic communications, even under an alias, never give the impression that you are speaking on behalf of CeramTec.

If you believe a false statement about our Company has been posted, do not post or share non-public information, even if your intent is to "set the record straight." Your posting might be misinterpreted, start false rumors or may be inaccurate or misleading. Instead, contact the General Counsel.

Honoring Our Responsibility to Others

Fair Dealing with Business Partners

We treat our business partners fairly. We work to understand and meet their needs, while always remaining true to our own ethical standards. We tell the truth about our needs, services and capabilities and never make promises we believe we cannot keep.

In short, we treat our business partners as we would like to be treated.

We treat our business partners fairly ...

Do the Right Thing

- Treat each business partner fairly and honestly.
- Speak up and talk to your manager if you have concerns about any error, omission, undue delay or defect in quality or our customer service.
- Promptly raise with a manager any potential conflict of interest between you, our business partners or our Company.
- Never follow a business partner's request to do something that you regard as unethical or unlawful.
- Be responsive to business partners' requests and questions. Only promise what you can deliver and deliver on what you promise.
- When selecting suppliers, we assess each supplier's ability to satisfy our business and technical needs and requirements. We also make purchasing decisions based on the long-term cost and benefit to CeramTec. All agreements are negotiated in good faith and must be fair and reasonable for both parties.

Stay Alert For

- Pressure from colleagues or managers to cut corners on quality or delivery standards.
- Temptations to tell customers what you think they want to hear rather than the truth; if a situation is unclear, begin by presenting a fair and accurate picture as a basis for decision.
- Choosing suppliers based on personal relationships.

Honoring Our Responsibility to Others

Interacting with the Government

We are committed to meeting the many special legal, regulatory and contractual requirements that apply to our government contracts. These requirements may apply to bidding, accounting, invoices, subcontracting, employment practices, contract performance, gifts and entertainment, purchasing and other matters. These requirements may also flow down to individuals and companies working on our behalf. Make sure you know and follow the law, regulations, our Code and CeramTec policies as they relate to government-related work.

Make sure you know and follow the law ...

All employees are expected to fully cooperate with internal and external investigations and audits that are conducted by our Company or by government officials to the extent that such cooperation does not limit the individual rights an employee may have. Ensure that any information you provide is true, accurate and complete. If you learn of a potential or actual government investigation or inquiry, immediately notify your manager and the General Counsel before taking or promising any action. Never destroy, alter or conceal any document in anticipation of or in response to a request for these documents.

Conflicts of Interest

A conflict of interest can occur whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of CeramTec. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest may be actual, potential or even just a matter of perception. Since these situations are not always clear-cut, you need to fully disclose them to your manager so that we can properly evaluate, monitor and manage them.

Do the Right Thing

- Avoid conflict of interest situations whenever possible.
- Always make business decisions in the best interest of CeramTec.
- Discuss with your manager full details of any situation that could be perceived as a potential conflict of interest.
- Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with CeramTec.

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate Opportunities

If you learn of a business opportunity because of your job, it belongs to CeramTec. This means that you should not take that opportunity for yourself unless you get approval from the HR department.

Friends and Relatives

On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a customer, supplier or competitor. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager in order to determine if any precautions need to be taken.

Outside Employment

To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose to and discuss with your Manager and Human Resources if you are contemplating any business or non-profit activities outside of your employment with CeramTec. If approved, you must ensure that the outside activity does not interfere with your work at CeramTec.

Personal Investments

A conflict exists if you have a significant ownership or other financial interest in a competitor, vendor, supplier or customer. All such arrangements must be cleared with your manager and Human Resources before they are implemented.

Civic Activities

You must not accept a seat on the board of directors or advisory board of any of our competitors, suppliers, customers or partners. If you see a justified reason why you should join such a board, you must contact the Company's management board whose written approval will be required.

Honoring Our Responsibility to Others

Gifts, Hospitality and Entertainment

A modest gift may be a thoughtful "thank you," or a meal may be an appropriate setting for a business discussion. If not handled carefully, however, the exchange of gifts and the provision of entertainment may appear to create a conflict of interest or other misconduct.

The rules for what you may give or accept can vary depending on who the offeror or recipient is. Make sure you comply with our policies and the law.

We do not accept or provide gifts ...

We do not accept or provide gifts, favors or entertainment – even if it complies with our policies – if the intent is to improperly influence any decision.

Suppliers and Other Business Partners

Only give and accept gifts that:

- Are nominal in value.
- Offered infrequently.
- Foster goodwill in business relationships.
- Comply with the policies of both the giver and receiver.
- Are not cash or cash equivalents.
- Would not embarrass you or our Company (e.g., entertainment at sexually oriented establishments).
- Do not obligate – or appear to obligate the recipient.

Government Officials

Laws around the world may vary, but for us it is simple: We do not offer payments, gifts, entertainment or anything else of value to government officials without obtaining authorization in advance from the Compliance Officer. You should know that such authorization will be granted only in rare circumstances.

Healthcare Professionals

Except for very specific situations that are described in our policies, we do not offer payments, gifts or anything else of value to healthcare professionals. What about meals or educational items offered in conjunction with educational programs? Refer to – and comply strictly with – our policies.

When traveling, I received a gift from a business partner that I believe was excessive. What should I do?

You need to let your manager know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to distribute it to employees or donate it to charity, with a letter of explanation to the donor.

Product Safety and Quality

We develop our products with human beings in mind and are dedicated to the delivery of safe, high-quality products, applications and solutions to a wide range of markets. Our commitment to safety and quality has allowed us to earn the trust of customers and contribute to quality of life around the world.

We deliver on our promises ...

How We Inspire Trust

We deliver on our promises and ensure that we meet the highest standards by:

- **Innovating our processes and operations.**
- **Following the most stringent guidelines applicable.**
- **Testing our products to ensure that only those of the highest quality reach the market.**
- **Evaluating the performance of our products throughout their life to ensure quality and reliability.**

Do the Right Thing

- Help CeramTec continue producing quality products by always making safety a priority, adhering to the highest standards and never sacrificing quality to meet a Company target or deadline.

If you see or suspect activity that goes against our commitment, speak up to a member of the Quality and Regulatory Department.

I think there may be an issue with one of the manufacturing processes at my facility, but we are behind schedule and if I say anything, we will be delayed further while the Company investigates. What should I do?

CeramTec does not sacrifice quality to meet a deadline or target. You should report the matter immediately to the quality department.

Following the Letter and the Spirit of the Law

Anti-Corruption and Anti-Bribery

We believe that all forms of bribery and other corrupt practices are an inappropriate way to conduct business regardless of local customs. CeramTec is committed to complying with all applicable anticorruption laws.

We do not pay or accept bribes, kickbacks or facilitation payments, at any time for any reason. Similarly, we expect the same stance from any non-employee or third-party firm who represents or works with CeramTec. The only possible exception is if a potentially improper payment is necessary to protect an individual's health or safety. In such a situation, you should immediately report the payment to the Compliance Officer.

Key Definitions – Bribery, Corruption and Facilitation Payments

Bribery means giving or receiving anything of value (or offering to do so) in order to obtain business or financial or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation Payments are typically small payments to a low-level government official that are intended to encourage the official to perform his or her responsibilities.

It is especially important that we exercise due diligence and carefully monitor third parties acting on our behalf. We carefully screen all third parties, including suppliers, consultants and vendors who work on our Company's behalf, particularly when dealing in countries with high corruption rates and in any situations where warning signs would indicate further screening is needed before retaining the third party. Third parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

Do the Right Thing

- Never give anything of value inconsistent with applicable laws and our internal regulations to any government official. If you are not sure of the what national law provides, the safest course of action is to not give anything of value.
- Understand the standards set forth under anti-bribery laws which apply to your role at CeramTec.
- Accurately and completely record all payments to third parties.

Stay Alert For

- Apparent violations of anti-bribery laws by our business partners.

I work with a foreign agent in connection with our operations in another country. I suspect that some of the money we pay him goes toward making payments or bribes to government officials. What should I do?

This matter should immediately be reported to the Compliance Officer for investigation. If there were bribery and we fail to act, both you and our Company could be liable.

Following the Letter and the Spirit of the Law

Data Privacy

We respect all personal data. Follow our policies and all applicable laws and regulations, including the EU General Data Protection Regulation (GDPR) in collecting, accessing, using, storing, sharing and disposing of sensitive information. Only use personal data – and share it with others outside of CeramTec – for legitimate purposes.

Make sure you know the kind of information that is considered personal data. It includes any information relating to an identified or identifiable person, such as a name, identification number, location data, online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

We respect all personal data ...

Stay Alert For

- Failing to shred or otherwise securely dispose of personal information.
- When sending to multiple recipients, unless emailing internally, you'll need to use the BCC function.

Fair Competition

We believe in free and open competition and do not engage in improper practices that may limit competition. We strongly reject using unethical or illegal business practices to gain competitive advantages.

We believe in free and open competition ...

Competition and antitrust laws are *complex* and requirements can vary depending on the circumstances, but in general, the following activities should be avoided and, if detected, reported to the Compliance Officer and the General Counsel.

- **Sharing our Company's competitively sensitive information with a competitor.**
- **Sharing competitively sensitive information of business partners or other third parties with any unauthorized person or entity, most importantly their competitors.**
- **Attempting to obtain non-public information about competitors from new hires or candidates for employment.**

Do the Right Thing

- Never enter into agreements (written or verbal) with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers or markets.
- Never engage in conversations with competitors about competitively sensitive information.

Stay Alert For

- Collusion – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages or allocations of markets.
- Bid-rigging – when competitors or service providers manipulate bidding so that fair competition is impossible. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting non-competitive bids.
- Tying – when a company with market power forces customers in connection with the sale of a product to agree to purchase additional services or products that the customer does not want or need.
- Predatory pricing – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

Following the Letter and the Spirit of the Law

Global Trade Compliance

CeramTec has global operations that support a growing, worldwide customer base. To maintain and grow our global standing, all employees, officers and directors must strictly comply with laws that govern the import, export and re-export of our products, in all countries where our products are manufactured, repaired or used. Any violation of these laws, even through ignorance, could have long-lasting damaging effects on our business.

If your responsibilities include exporting products or receiving imported products, you are responsible for screening customers, suppliers and transactions to ensure that we comply with all applicable export and import requirements.

Do the Right Thing

- Obtain all necessary licenses before the export or re-export of products, services or technology.
- Report complete, accurate and detailed information regarding every imported product, including its place(s) of manufacture and its full cost.
- Direct any questions you have regarding imports or exports of our products, parts or technology to the Trade Compliance Committee.

Stay Alert For

- Transferring technical data and technology to someone in another country, such as through email, conversations, meetings or database access. This restriction applies to sharing information with co-workers, as well as non-employees. (Also note the precautionary statements in chapter "Confidential Information and Intellectual Property" about our Information Policy.)
- Transporting Company assets that contain certain technology (such as a computer an employee takes on a business trip) to an export restricted country.

My work requires regular interaction with customs officials. As part of my job, I am routinely asked to provide them with information about our imports and exports. Do I really need to contact the Trade Compliance Committee prior to each and every submission of information to the government?

The right approach here would be to discuss with Trade Compliance Committee the types of requests your department routinely receives from customs officials. These routine requests, once understood, could conceivably be handled without any trade compliance review. Extraordinary requests would still require the Trade Compliance Committee review to ensure that you are responding accurately, fully and in accordance with the law.

Political Activities

You have the right voluntarily to participate in the political process, including making personal political contributions. However, you must never use the CeramTec name in connection with such contributions so that it is clear that you are expressing your personal views and not those of CeramTec. You must never use Company funds for any political purpose without proper authorization.

You must never use company funds ...

Do the Right Thing

- Ensure that your personal political views and activities are not viewed as those of the Company.
- Do not use the Company's resources or facilities to support your personal political activities.

Stay Alert For

- Pressure. Never apply direct or indirect pressure to another employee to contribute to, support or oppose any political candidate or party.
- Improper influence. Avoid even the appearance of making political contributions in order to gain favor or in an attempt to exert improper influence.
- Conflicts of interest. Holding, or campaigning for, political office must not create, or appear to create, a conflict of interest with your duties at CeramTec.

Insider Dealing

In the course of business, you may learn confidential information about CeramTec or about publicly traded companies that is not available to the public at large. Trading relevant securities while aware of such material non-public information or disclosing such information to others who then trade ("tipping"), is prohibited by various laws and under this Code.

Material Information

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. An example of information about a company that may be material is essential anything that a company would, or would have to, consider worthy of a press release at some point, such as:

- **A proposed acquisition or sale of a business.**
- **A significant expansion or cutback of operations.**
- **A significant product development or important information about a product.**
- **Extraordinary management or business developments.**
- **Changes in strategic direction such as entering new markets.**

Following the Letter and the Spirit of the Law

Do the Right Thing

- Do not buy or sell securities of any company when you have material non-public information about that company.
- Protect material non-public information from the general public including information in both electronic form and in paper copy.
- Discuss any questions or concerns about insider trading with the Compliance Officer or the Legal Department.

Anti-Money Laundering

Money laundering is a global problem with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds so that funds are made to appear legitimate, and it is not limited to cash transactions. Involvement in such activities undermines our integrity, damages our reputation and can expose our Company and the individuals involved to severe sanctions. Report any suspicious financial transactions and activities to the Compliance Officer and, if required, to appropriate government agencies.

Special Excursus on Meeting Medical Industry Ethics Standards

Ensuring Ethical Interactions with Health Care Professionals.

It is no secret and it applies to all of us: as a manufacturer of products that include ceramic components that are implanted into human beings, the Company must not only comply with a great number of specific laws and regulations, but we are also held to a higher ethical standard in certain of our business interactions. The are some special areas in which we must be even more vigilant and mindful of our ethical obligations, namely, whenever we interact with health care professionals. The reason is that health care professionals make decisions that directly affect a patient's – a human being's – health and happiness. And when they make these decisions, including selecting the products that they wish to implant into patients, their choices must not even have the appearance of being based on anything but facts and quality. We must never influence such decisions, or have others do so for us, other than through all the quality and factual arguments that speak for our products.

You can imagine that therefore any interaction we may have with healthcare professionals must be open, transparent, fair and justified. Some examples are engaging healthcare professionals for research purposes, as speakers, or otherwise as consultants: considering giving courtesies or inviting health care professionals to meals; supporting public research or co-developing a product with a health care professional.

In order that you may have helpful guidance with respect to the interactions listed above – and many more – the Company has issued Regulations which you must follow at all times. The Regulations are based on a set or principles which should help you in all your interactions with health care professionals as a kind of rule of thumb. They are as follows:

1 **Transparency:** Always be transparent about your interactions with healthcare professionals. If you must report such interactions, for example because of sunshine laws, do so!

2 **Separation:** Always separate your sales activities from other interactions with health care professionals such as engaging them for research activities.

3 **Documentation:** If you enter into an agreement with a healthcare professional, such as a consulting agreement, document it in a written agreement.

4 **Fair Market Value:** if you enter into an agreement with a healthcare professional, such as a consulting agreement, never pay more than Fair Market Value.

5 **Reputation:** Never do anything or enter into any arrangement that you know in your heart may one day blemish the reputation of the Company.

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