



BUSINESS
PRINCIPLES
FOR
BUSINESS
VENDORS

A GUIDE TO ETHICAL STANDARDS



TABLE OF CONTENTS



- 02** Act With Integrity / Anti-Corruption
- 03** Respecting Others & Human Rights
- 04** Confidentiality & Privacy
- 05** The Environment & Conflict Minerals
- 06** Speaking Up & Reporting Concerns

ACT WITH INTEGRITY / ANTI-CORRUPTION



RTI Surgical, Inc. (including its subsidiaries) (“RTI”) expects our Business Partners to understand and comply with public sector contracting and procurement laws, such as the Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act and other international laws adopted pursuant to the Organization for Economic Cooperation and Development Convention on Combating Bribery.

RTI Business Partners are prohibited from making direct or indirect payment of any funds, or providing any gift or financial benefit, to any foreign government official, public international organization official, candidate for foreign political office, political party official, representative of a government official, candidate or political party, or to any other person with the knowledge that the payment, gift or financial benefit will be offered, given or promised to any such person.

As an RTI Business Partner, you must not offer or make any bribe or improper payment, either directly or indirectly, in cash or in kind, nor allow or encourage others to offer or make improper payments.

You must honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy.

Please take a moment to contemplate how your actions may appear to others. In addition, our compliance with anti-corruption along with other supporting materials can provide further guidance or context in regards to our expectations. This policy and other supporting documents can be requested directly from the Compliance Office or found online at www.rti.com.

While Business Partners are expected to self-monitor and demonstrate their compliance with this guide, RTI may audit or inspect Business Partners' facilities or records to assure compliance. Compliance with this guide, and attaining training on this guide as may be offered by RTI, is required in addition to any other obligations in any agreement such Business Partner may have with RTI.

RESPECTING OTHERS & HUMAN RIGHTS



RTI is vehemently opposed to human trafficking and slavery and supports all efforts to eradicate such practices. RTI would never knowingly conduct business with Business Partners engaged in such practices.

We expect our Business Partners, as applicable, to respect others by:

- Providing a work place free of harassment and discrimination
- Providing a safe and healthy work environment
- Being attentive to safety
- Observing applicable laws and regulations governing equal employment, discrimination, wages and work hours

Labor Standards and Human Rights

RTI forbids the use of child and compulsory labor, human trafficking and slavery, unsafe and hazardous working conditions and environments, and any behavior that does not maintain human dignity and respect.

Visit **End Human Trafficking Now** at <http://endhtnow.com> for more information about human trafficking and the global fight to end it.

CONFIDENTIALITY & PRIVACY



Confidentiality

RTI Business Partners with access to RTI's confidential information must not disclose such information to third parties without written consent from RTI. In addition, Business Partners must respect RTI's intellectual property rights and the transfer of confidential information must be conducted in a manner that protects RTI's intellectual property rights. Confidential information may include, but is not limited to, product pricing, costs of materials, employee information, designs, and product technology.

Privacy

When RTI Business Partners handle any individual's personal confidential information in the performance of services on our behalf, RTI requires that such information is properly safeguarded and protected against unauthorized disclosure. Any actual or potential unauthorized disclosures of an individual's personal confidential information must be reported to the RTI Compliance Office at 386.418.8888 x4480 or by email at rticompliance@rtix.com.





The Environment

RTI conducts its operations in a sustainable manner and in compliance with all environmental laws and standards. We expect our Business Partners to also act in an environmentally responsible and efficient manner and to minimize adverse impacts on the environment. Business Partners, as applicable, are encouraged to conserve natural resources, to avoid the use of hazardous materials when possible and to engage in activities that reuse and recycle.

Conflict Minerals

RTI fully supports the Dodd-Frank Wall Street Reform and Consumer Protection Act and the U.S. Securities & Exchange Commission's regulations regarding the use of conflict minerals. RTI is committed to sourcing conflict-free minerals for use in the manufacturing of our metal implants and other products.

In addition to our own compliance with the Act and regulations, we also expect our Business Partners to operate in compliance, sourcing materials solely from conflict-free areas around the globe.

SPEAKING UP & REPORTING CONCERNS

It is the obligation of the Business Partner, and their employees, to report situations that may involve violations of this guide, RTI policies and procedures, industry codes or applicable laws. Please report an issue directly to the Compliance Office at **386.418.8888 x4480** or by using the Confidential Ethics Hotline at **1.855.231.0619**. In addition, RTI has also made available a confidential, multi-lingual website that can be found at www.rtisurgical.ethicspoint.com.

RTI does not tolerate retaliation against any person who reports violations of law or policy. No one who reports any suspected legal or policy violation in good faith will be subject to retaliation for making such a report. Good faith means that the individual coming forward with all of the information believes he or she is giving a sincere, truthful, and complete report.





If you have questions about the content contained in this guide or require assistance with a particular issue, please contact the RTI Compliance Office at **386.418.8888 x4480** or by email at rticompliance@rtix.com.



11621 Research Circle
Alachua, FL 32615
877.343.6832
www.rtisurgical.com

