



Corporate Code of Conduct



Table of Contents

Scope	1	Be Respectful, Treat Others Fairly, and Protect	
Purpose	2	Our Resources	6
Comply with the Law	2	Diversity and Inclusion	6
Accurate Financial Reporting	2	Privacy and Confidentiality	7
Internal Controls	2	Data Privacy and Data Protection	7
Retention of Financial Records	2	Patient Privacy	7
Accuracy in Filing Patient Claims	2	Employee Confidentiality	7
Global Compliance	3	Confidential Information	7
Anti-Bribery and Anti-Corruption	3	Protect Company Assets	8
Government Officials	3	Proprietary Information	8
Antitrust and Competition	3	Be Responsible	8
Insider Trading	3	Environmental Protection and Responsibility	8
Trade Restrictions and Export Controls	3	Occupational Safety and Health	8
Anti-Money Laundering	3	Substance Abuse	9
Compliance with Laws and Regulations	3	Product Quality	9
On-label Product Promotion	3	Communications	9
Approval of Promotional Materials	4	Marketing and Advertising Activities	9
Be Honest and Ethical	5	Public Statements	9
Ethical Conduct	5	Be Vigilant and Speak Up	10
Conflicts of Interest	5	Seeking Guidance and Reporting Potential	
Political Contributions	5	Compliance Violations	10
Compliance with Labor Laws and Anti-human Trafficking	5	Compliance Hotline	10
Conflict Minerals	5	Non-retaliation	10
Industry Standards	6		
Gifts and Avoiding the Appearance of Impropriety	6		

Our Vision

The unrivaled partner in Med Tech, delivering exceptional experiences and life-changing solutions

Our Mission

We provide medical technologies that heal musculoskeletal pathologies. We enable our teams through opportunities for growth, ownership of responsibilities, and empowerment to execute. We do this for patients and the healthcare professionals who treat them. We collaborate with world-class surgeons and other partners to bring to market highly innovative, cost-effective, and user-friendly medical technologies through excellent customer service. We do this to improve people's quality of life, and in doing so, create exceptional value for our customers, employees, and stockholders.

Scope

This Code of Business Conduct ("**Code**") defines the standard for corporate conduct for Orthofix Medical, Inc., its subsidiaries and worldwide affiliates ("**Orthofix**" or the "**Company**"), and outlines the expectations for ethical conduct applicable to Orthofix directors, officers, and employees ("**Orthofix Personnel**"), as well as anyone acting on Orthofix's behalf, Orthofix suppliers, and those who provide manufacturing goods and services to Orthofix ("**Associates**").

The Code covers a wide spectrum of topics but cannot cover every issue that may arise. Company policies, procedures, and Employee Handbooks serve as supplements to this Code. Orthofix Personnel and Associates must always use good judgment and common sense when acting on behalf of the Company. Orthofix Personnel should ask their supervisors or the Compliance and Legal Departments when unsure about any aspect of the Code or its application in any situation.

What to Know

- ✓ Read and review the Code as well as policies, procedures, and work instructions related to your role.
- ✓ If you have questions, ask.
- ✓ Use common sense and sound judgment when you perform your job.
- ✓ Promptly report potential violations of the law or the Code to your supervisor, Legal, or Compliance Department personnel.
- ✓ If you are a supervisor, ensure your direct reports know they can come to you for questions or concerns and that you are committed to the values and obligations outlined in this Code.
- ✓ Failure to comply with this Code, Company policies, or applicable laws might result in disciplinary action, up to termination of employment for Orthofix Personnel, and contract termination for Associates.
- ✓ You have a responsibility to speak up when you are in a situation or aware of something you believe may violate this Code, the Company's Compliance Program, Orthofix policies and procedures, or the law (collectively, "**Misconduct**").

Purpose

Integrity and personal accountability are core principles that drive Company interactions with customers, patients, shareholders, employees, regulators, and others with whom Orthofix does business. These principles, along with compliance with this Code, other Company policies and applicable laws and regulations, must be top priority among Orthofix Personnel and Associates to preserve the Company's reputation and ensure our long-term success.

The goals of our Code are to prevent and detect wrongdoing by emphasizing the obligation of Orthofix Personnel and Associates to:

- Comply with the law
- Be honest and ethical
- Be respectful, treat others fairly, and protect Company resources
- Be responsible
- Promptly report misconduct
- Be vigilant and speak up

Comply with the Law

Accurate Financial Reporting

Orthofix requires honest and accurate record keeping and reporting of information and data to make responsible business decisions. Orthofix Personnel and Associates must ensure that all documentation, including financial documents, records, quality controls, expense reports, and certifications accurately reflect the true nature of a fact or event and are completed, retained and destroyed in accordance with the Company's document retention and destruction standards.

Internal Controls

It is Orthofix's policy to maintain books, records, and accounts that accurately and fairly reflect all transactions, dispositions of assets and other events that are subject to regulatory record keeping requirements, including generally accepted accounting principles and other applicable rules, regulations, and criteria for preparing financial statements, and for preparing periodic reports filed with the United States Securities Exchange Commission ("**SEC**"). Unrecorded liabilities or funds, regardless of their purpose are not permitted. Likewise, no improper or inaccurate entry may be made on books or records.

Retention of Financial Records

We maintain accurate and complete financial records. These records serve as the basis for managing our business and measuring and fulfilling our obligations to customers, patients, employees, suppliers, and shareholders. These records are also used to demonstrate compliance with tax, regulatory, and financial reporting requirements. No relevant documents may be destroyed during an investigation initiated by authorities or the Company.

Accuracy in Filing Patient Claims

For our Bone Growth Therapies business, accurate billing and submission of claims to third party payers is a top priority. We ensure:

- Accurate billing and submission of claims for only those medically necessary products and services that are provided by eligible Personnel;
- Corrective actions in the event of erroneous claim or bill submissions; and
- Compliance with all applicable laws, regulations, and guidelines.

What to Know

- ✓ Follow all Company accounting, reporting, and control procedures.
- ✓ Never falsify, backdate, intentionally destroy, or otherwise tamper with any records.
- ✓ Accurately and clearly represent the relevant facts and the true nature of a transaction on all documents.
- ✓ Never approve any payments on behalf of Orthofix used for any purpose other than as described by the the documentation supporting the payment.
- ✓ Never misclassify accounts or improperly accelerate or defer expenses or revenues.

Global Compliance

Regardless of where we do business, following applicable local laws, regulations, and Company policies is not only our obligation, but also a precursor to our success. Global laws and regulations can be complex, ever-changing, and vastly different from one country to the next. This is why each of us must be held accountable for knowing the laws, regulations, and Company policies that apply to our individual roles. While it may sound simple to “follow the rules”, it can be difficult in practice – especially in our highly regulated and complex industry. Orthofix Personnel are encouraged to seek guidance from supervisors and other trusted leaders when they encounter situations that seem unclear or difficult to navigate. Likewise, Associates should ask an Orthofix business contact if questions or concerns arise.

Anti-Bribery and Anti-Corruption

We understand that our actions directly impact the communities we serve and the life sciences industry at large. In alignment with this commitment, we strictly adhere to a zero-tolerance policy for bribery and corruption. All Orthofix Personnel and Associates, regardless of position or geographic location, are expected to conduct business in a fair, transparent, and lawful manner. This includes avoiding any direct or indirect actions that could be perceived as offering, promising, giving, accepting, or soliciting anything of value as an attempt to influence a decision or gain an unfair advantage. Our anti-bribery and anti-corruption policies are designed to comply with the laws and regulations of the countries where we operate.

Government Officials

Orthofix interacts with government employees and other officials around the world. You should not do anything that could be viewed as an attempt to improperly influence the decisions of a government, its officials, or its employees, or that could be seen as encouraging government employees or public officials to violate applicable laws, rules, and/or regulations. Never offer or accept gifts or anything of value that could be seen as a bribe or a kickback. If a government employee, or public official requests or demands any such benefit, report this immediately to your supervisor, the Compliance Department, or via the anonymous Compliance Hotline.

Antitrust and Competition

We are committed to fostering healthy competition and complying with all applicable antitrust and competition laws globally. It is fundamental to our mission to innovate and serve our communities ethically and responsibly. We recognize that compliance with these laws is critical to maintain trust and integrity in our highly competitive industry. Therefore, Orthofix Personnel and Associates, regardless of position or location, are required to conduct business in a manner that supports free and fair competition. This includes avoiding any activities that could be viewed as monopolistic, engaging in price fixing, bid rigging, or any other practices that unfairly distort market dynamics. We provide education and resources to our Personnel and Associates to promote understanding and implementation of these requirements in all of our business dealings.

Insider Trading

It is against the law to engage in insider trading. Non-public, material information gained through employment or association with Orthofix cannot be used to buy or sell Orthofix stock or other securities. Likewise, you cannot provide an insider “tip” to others who might use it to make a trade in Orthofix securities or otherwise. Information is considered “material” if a reasonable investor would consider it important in making an investment decision.

Trade Restrictions and Export Controls

Certain countries have laws that regulate the import and export of medical devices, as well as personal information. All Company activities must be conducted in strict compliance with the applicable trade laws of the countries in which we operate. This includes adherence to laws related to sanctions, embargoes, and other trade restrictions. Make sure you are aware of and understand all Orthofix import and export policies and procedures that apply to your job and contact a member of the Legal Department should any questions arise.

Anti-Money Laundering

All financial transactions must be transparent, legal, and comply with both local and international anti-money laundering (“AML”) laws and regulations. Orthofix Personnel and Associates must exercise due diligence in verifying the legitimacy of their dealings, preventing any engagement in or facilitation of money laundering activities.

Compliance with Laws and Regulations

We conduct our business, medical, scientific, and patient activities in compliance with applicable federal, state, local and international laws, rules and regulations that govern the Company, including Orthofix’s participation in federal healthcare programs, United States Food and Drug Administration (“FDA”) requirements, and transparency tracking and reporting requirements. We have established a Compliance program to ensure compliance with such laws and to prevent, detect, and correct violations. If a specific area or topic is not addressed in this Code, Orthofix Personnel or Associates should review Orthofix policies and procedures for additional requirements and guidance, or contact their supervisor or the Compliance Department. If you have any questions or would like to discuss anything relating to the Compliance program, please contact the Compliance Department at compliance@orthofix.com.

On-label Product Promotion

The promotion of medical devices is highly regulated by the FDA and various other regulatory bodies in the countries where we do business. The applicable laws and regulations governing product promotion are designed to make certain that the information that manufacturers provide to health care professionals and patients about the uses, benefits, and risks of medical devices is truthful, not misleading, and based on comprehensive scientific evidence and clinical medicine. Among other things, these laws and regulations generally limit the promotion of medical devices to the cleared or approved uses of the device by the governing regulatory bodies. Accordingly, Orthofix Personnel and Associates must only promote our products for on-label uses. All Orthofix sales and marketing Personnel must be familiar with and understand the on-label uses of products for which they are responsible. They must also ensure that Associates engaged to promote Orthofix products are familiar with and understand the on-label uses of our products.

Approval of Promotional Materials

Only materials that have been approved in accordance with Company policy may be used in connection with the promotion of our products. Both the alteration of approved materials and the use of home-made materials are strictly prohibited.

What to Know

- ✓ Be familiar with and understand the on-label uses of the products you sell or market.
- ✓ Only promote products for on-label uses.
- ✓ Respond to questions from HCPs concerning unapproved or uncleared uses of our products only in accordance with Orthofix policies and procedures.
- ✓ Refer all off-label use requests for information to Regulatory Personnel.
- ✓ Only use Company-approved materials in connection with the promotion of our products.
- ✓ Do not make your own materials or alter any Orthofix-approved promotional materials.

Be Honest and Ethical

Ethical Conduct

All business dealings must be conducted with a high level of integrity, honestly, and free of fraud and deception.

Conflicts of Interest

Orthofix Personnel and Associates must avoid situations where personal interests could conflict with the interests of the Company. In dealing with current or potential customers, suppliers, contractors, and competitors, each employee and contracted Orthofix Associate must act in the best interests of Orthofix to the exclusion of personal advantage. **Any potential conflicts of interest must be immediately disclosed to your supervisor, who will contact the Compliance Department.** In addition, the Audit Committee of the Board of Directors will review and approve all related party transactions, as required by the SEC, the Nasdaq Stock Market, and other regulatory bodies to which Orthofix is subject.

It is the obligation of all Orthofix Personnel and Associates to ensure that they remain free of conflicts of interest in the performance of their responsibilities for the Company. A conflict of interest may occur if your personal interests or activities influence (or appear to influence) your ability to remain objective when performing your job. A conflict of interest may also exist if the demands of any outside activities interfere with your job, or you divert Orthofix resources for your own personal gain.

Orthofix Personnel must not accept or permit any member of their immediate family to accept, any gifts, gratuities, or other favors from any customer, third party, or other person doing or seeking to do business with Orthofix, other than items of nominal value and received for a legitimate business purpose. Any gifts that are not of nominal value should be returned immediately and reported to their supervisor or Human Resources.

Political Contributions

Orthofix encourages employees to participate in the political process. However, in doing so, you may not create the impression that you are speaking or acting on Orthofix's behalf. You may not contribute or donate Orthofix funds, products, services, or other resources to any political cause, party, or candidate. You may make voluntary personal contributions to lawful political causes, parties, or candidates, but it is your responsibility to obey all laws relating to political contributions. If you have questions about making a political contribution, you should contact Orthofix's Compliance Department for further guidance.

Compliance with Labor Laws and Anti-Human Trafficking

We support and protect human rights in all operations. Orthofix complies with applicable labor and employment laws prohibiting any form of child labor or other exploitation of children in the manufacturing and delivery of medical devices, consistent with provisions of the International Labor Organization's Minimum Age Convention of 1973. We promote a safe and healthy working environment free from any form of abuse. Likewise, our contracted Associates must not engage in any forced, indentured, slave, or child labor, nor should they treat employees harshly or inhumanely.

Conflict Minerals

Orthofix understands the importance of ethically sourcing the materials used in manufacturing our medical devices. We acknowledge the significant environmental and human hardships associated with the mining of certain minerals, often called "conflict minerals" which are mined in conditions of armed conflict and human rights abuses. As part of our dedication to corporate

What to Know

- ✓ Promptly report any financial, business, romantic, or family relationship with an Orthofix competitor, customer, or supplier to your supervisor or Compliance personnel.
- ✓ Obtain prior approval from Compliance personnel for any actual or potential conflict of interest with any Orthofix competitor, customer, or supplier.
- ✓ Do not accept gifts that are not of nominal value from third parties seeking to do business with Orthofix.

responsibility, Orthofix is committed to ensuring that our products do not directly or indirectly finance groups engaged in armed conflict and human rights abuses. To that end, we have implemented standards that align with the Dodd-Frank Wall Street Reform and Consumer Protection Act and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Through these standards, we aim to contribute to the global efforts to eradicate the exploitation associated with conflict minerals.

Industry Standards

In addition to adhering to applicable laws and regulations, this Code and Orthofix's policies and procedures include guidance provided by the Advanced Medical Technology Association ("**AdvaMed**"), MedTech Europe ("**MTE**"), and the Medical Device Manufacturers Association ("**MDMA**"). The AdvaMed Code of Ethics on Interactions with Health Care Professionals, the MTE Code of Ethical Business Practice, and the MDMA Code of Conduct outline appropriate and inappropriate interactions with Health Care Professionals, referred to as Health Care Professionals ("**HCPs**").

Gifts and Avoiding the Appearance of Impropriety

The receipt and provision of gifts, meals, or entertainment can be considered normal practice in other industries. However, because the healthcare industry is highly regulated, interactions with HCPs and patients are heavily scrutinized. Accordingly, Orthofix does not use improper business courtesies, relationships, or gifts to conduct or obtain business. All business relationships will be entered into on the basis of a fair market exchange, including factors such as price, quality, performance, service, delivery, and reputation.

We do not provide entertainment or gifts to HCPs. Provision of items could be viewed as an exchange for favorable treatment or advantage. Orthofix Personnel and Associates may provide occasional and modest meals or refreshments in connection with education programs or business meetings in accordance with Orthofix policies and procedures. More detailed information on appropriate interactions with HCPs is included in our policies and procedures. Associates should reference the Orthofix Compliance Manual for more information. Similarly, it is against Orthofix policy to give payments, gifts, or gratuities to patients, whether existing or prospective.

Be Respectful, Treat Others Fairly, and Protect Our Resources

Diversity and Inclusion

Orthofix is committed to creating a workplace where diversity is celebrated, recognizing that our strength lies in our differences. All Orthofix Personnel and Associates must be treated with respect and dignity, regardless of gender identity or expression, sex, color, race, religion, age, sexual orientation, disability, ancestry, marital status, national origin, veteran status, pregnancy, or other characteristic. We strive to create a workplace that reflects the diverse communities we serve, where every employee has the opportunity to thrive, contribute, and grow. Our policies and practices are designed to ensure equity in hiring, promotion, training, and compensation, eliminating barriers to full participation. We actively seek diverse perspectives, believing that innovation flourishes in an inclusive culture

What to Know

- ✓ Do not give any business courtesy that could be viewed as an attempt to gain favorable treatment or advantage.
- ✓ We provide HCP travel and lodging for certain educational and business meetings and in accordance with Orthofix policies.
- ✓ Do not waive a patient's financial obligation unless the patient has a financial hardship that complies with Company policy.

What to Know

- ✓ Do not treat Orthofix Personnel or Associates differently because of their gender identity or expression, sex, color, race, religion, age, sexual orientation, disability, ancestry, marital status, national origin, veteran status, pregnancy, or any other protected characteristic.
- ✓ Ensure your actions and words toward Orthofix Personnel and Associates are respectful and not harassing or discriminatory in violation of policy or law.

where varied viewpoints are welcomed and embraced. Discrimination or harassment of any kind will not be tolerated. This dedication to diversity and inclusion is not just a moral imperative but a strategic advantage that drives our success and innovation in the global marketplace. Orthofix Personnel and Associates must follow all applicable laws related to the prevention of discrimination or harassment at work. If you see, suspect, or experience any form of discrimination or harassment, speak up right away by contacting the Human Resources, Legal, or Compliance Departments, or the Compliance Hotline.

Privacy and Confidentiality

Data Privacy and Data Protection

At Orthofix, we recognize the significance of data belonging to our patients, customers, employees, and others. We understand that data protection plays an integral role in fostering trust and integrity in all of our business endeavors. We are steadfast in our commitment to safeguarding the privacy and security of our stakeholders' data, ensuring it is collected, used, and stored with the utmost respect and confidentiality. To uphold these principles, we adhere to stringent data protection policies, aligned with international best practices and regulatory compliance requirements. Our employees receive continuous training on data privacy laws and ethical handling procedures, emphasizing the importance of individual accountability and proactive data security measures. We work to maintain transparent communication with our patients and customers regarding data usage, obtaining clear authorization, and providing mechanisms for data access and correction, as necessary.

Patient Privacy

All Orthofix Personnel and contracted Orthofix Associates must protect and secure information concerning the treatment, payment, care, and condition of all patients and may not disclose patient information to any unauthorized person. Employees and contracted Orthofix Associates must adhere to all Orthofix policies and procedures regarding compliance with the regulations promulgated under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") including the Privacy, Security, and Breach Notification Rules, as applicable, and the General Data Protection Regulation ("GDPR"), and similar laws in countries and jurisdictions where Orthofix operates. Orthofix Personnel and Associates are expected to avoid patient care conversations and discussions in areas where visitors and the public may overhear them. Written and electronic-protected health information of patients must never be removed from Orthofix property without proper approval, and must be destroyed in accordance with applicable Orthofix policies and procedures.

Employee Confidentiality

All Orthofix Personnel have an obligation to respect and protect the confidentiality of records regarding the personal information of other employees. Information such as employee name, address, benefits, performance evaluations, credit information, medical information, and employment history is considered confidential and must not be discussed with anyone, including any Orthofix employees (except as required to perform one's job and then only in accordance with applicable Orthofix policies).

Confidential Information

We provide Orthofix Personnel, and at times our Associates, with confidential information with the understanding that such information is to be held in confidence and not communicated to anyone who is not authorized to know it, except as may be required by law. Confidential information includes all non-public information that might be of use to competitors, or harmful to Orthofix or its customers, if disclosed, such as Orthofix's business plans and business strategy documents, product pricing information, merger and acquisition targets and strategy, unannounced product information, contracts, sales data, significant

What to Know

- ✓ Do not discuss or provide Orthofix's confidential business information to anyone outside the Company without approval from the Legal Department.
- ✓ Never remove Orthofix property without prior approval from the Legal or IT Departments, as applicable.
- ✓ Safeguard access to employee and confidential business information.
- ✓ Only share information with fellow employees who have a legitimate need to know the information.

projects, customer and supplier lists, patents, patent applications, trade secrets, manufacturing techniques, marketing plans and strategies, clinical data, non-public financial or other sensitive information. All of these types of information are valuable resources, developed for Orthofix's exclusive benefit. No employee may disclose Orthofix's confidential information to any unauthorized third party or use Orthofix's confidential information for their own personal benefit. Contact the Legal Department if you have any questions about the proper use of confidential information, including licensed property, trademarks, copyright, or other similar topics.

Protect Company Assets

Orthofix property and services must be used for Company business and not for personal benefit. Theft, carelessness, and waste of corporate assets and resources, including paid employment time, have a direct impact on Orthofix's success. Orthofix Personnel and Associates must ensure the Company's assets are utilized efficiently and appropriately for legitimate business purposes.

Proprietary Information

Information, ideas, and intellectual property rights are valuable assets. Information obtained, developed, or produced by Orthofix and Orthofix Personnel and information supplied by others for the benefit of Orthofix are confidential. Information pertaining to Orthofix's competitive position or business strategies, and payment and reimbursement information is confidential. This information should not be shared with anyone outside of Orthofix and should be shared only with employees who have a legitimate need to know such information to perform their job responsibilities and who have agreed to maintain the confidentiality of the information.

Be Responsible

Environmental Protection and Responsibility

Orthofix cares about our planet and our communities, and we are committed to embedding sustainability throughout our business. We strive to maintain a clean and healthy environment, and to this end, we comply with all federal, state, local, and international environmental protection laws.

Orthofix Personnel are expected to support the Company's efforts to reduce our global environmental impact.

Occupational Safety and Health

Orthofix seeks to maintain a safe and healthy workplace. This includes compliance with applicable environmental, health, and safety requirements. To protect safety, Orthofix Personnel must safely manage hazardous materials and waste from point of entry to the point of final disposal. All hazardous material and other waste products must be identified, handled, labeled, and disposed of according to Orthofix policies and procedures.

What to Know

- ✓ Dispose of regulated medical waste or other waste according to Orthofix policies and procedures.
- ✓ Comply with Orthofix policies and procedures on waste and disposal recycling.
- ✓ Report any spills, leaks, or unsafe storage of hazardous materials or waste.
- ✓ Wear the proper personal protective equipment and clothing designed to safely handle materials.
- ✓ Caution anyone else handling hazardous materials improperly and report violations of policies and procedures accordingly.

Substance Abuse

The possession, consumption, sale or purchase of recreational drugs or alcohol on Orthofix property or during Company events is prohibited. Orthofix prohibits the use of recreational drugs or alcohol before or during the workday. The use of prescription or over-the-counter medications that may impair abilities to perform job functions must be taken in accordance with medical and prescription instructions and with precaution. The Company may occasionally approve limited alcohol availability for specific Company-sponsored functions, such as business dinners and events.

What to Know

- ✓ Never drink alcohol before or during work hours or have possession of or use illegal drugs.
- ✓ Help to maintain a safe and healthy working environment.

Product Quality

Above all, we are dedicated to improving patients' lives through high-quality products, procedures, and services. This includes making products that are safe and effective, and raising concerns related to product quality or safety. We also must report certain adverse events, product complaints, or medical device reports to applicable regulatory authorities, such as the FDA. It is every employee's responsibility to implement our quality management system and to comply with all Company quality system policies and procedures.

Communications

Marketing and Advertising Activities

Orthofix is committed to ensuring that communications and interactions on our products are truthful, accurate, non-misleading, balanced, substantiated by legitimate evidence, advance patient care, and otherwise comply with applicable federal healthcare program and FDA requirements, and the rules and regulations of the countries where we sell our products. In jurisdictions where marketing medical devices is permissible, in conducting marketing and advertising activities, Orthofix Personnel and Associates may offer factual information and documented evidence to the general public about our products. Marketing and advertising should not distort the truth or make false claims intended to attack or disparage our competitors. Orthofix Personnel and Associates must also abide by our policies and procedures when using social media, especially when referring to our Company and our products.

Public Statements

Because we are a publicly-traded company, we are subject to securities laws. This means that any public statements that could possibly be attributed to Orthofix should be carefully considered. Orthofix Personnel may not speak publicly for Orthofix unless specifically authorized to do so by appropriate members of management. Orthofix Personnel may not associate Orthofix with, or imply a Company endorsement of, any personal or social political activity, unless authorized by Orthofix to do so. Orthofix Personnel may not use Company letterhead or titles in personal communications or communications involving non-Orthofix business.

Be Vigilant and Speak Up

Seeking Guidance and Reporting Potential Compliance Violations

If you have questions about or need help with any legal, compliance, or ethics-related issue, you should contact your supervisor or a member of leadership with whom you feel comfortable. Discussions will be kept confidential, as appropriate. If you are not comfortable speaking with your direct supervisor, you may also reach out to the Legal or Compliance Departments for guidance.

Orthofix maintains a confidential Hotline for Orthofix Personnel and Associates who have legal or compliance questions, concerns, or problems. The Hotline may also be used for reporting suspected violations of this Code, the Compliance Program, Orthofix policies and procedures, and applicable laws and regulations.

Orthofix Personnel and Associates have an obligation to immediately report any suspected violations of the Code or other irregularities to their supervisor, the confidential Hotline, or the Compliance Department.

Compliance Hotline

In the United States, you may contact the Compliance Hotline at **1-855-603-6985** or via the internet at www.orthofix.ethicspoint.com and follow the on-screen instructions. International toll-free numbers are also listed on the Hotline website. The Hotline is available in several languages, including in all the languages where we have operations. You may ask your questions or report suspected violations anonymously as long as doing so is permissible under local laws.

The Compliance Hotline is managed by an unrelated third party – meaning other Orthofix Employees do not intake reports. You can be assured the Hotline is independent, secure, and confidential.

Non-retaliation

Orthofix Personnel will not be disciplined or terminated for merely reporting a suspected violation in good faith. However, please note that if you self-report misconduct, you may be subject to disciplinary action depending on the outcome of any follow up investigation into your misconduct. In such instances, voluntary disclosure of misconduct may result in a lesser penalty.

What to Know

- ✓ Contact your supervisor or the Compliance Department about any questions you have regarding the Code.
- ✓ Promptly report violations of any law, regulations, this Code, the Compliance Program, or Orthofix's policies and procedures to your supervisor or the Compliance Department, or call the Compliance Hotline.
- ✓ Include in your report all information necessary to ensure that the Compliance Department can complete an accurate and thorough review.

