

Corporate Policy 3

Harassment Free Workplace

Purpose

Stryker is committed to maintaining a workplace that is free of discrimination, intimidation, and unlawful harassment. This Policy outlines Stryker's policy prohibiting sexual and other unlawful harassment.

Scope

This Policy applies to all Stryker employees at all locations to the extent permitted by law. If any provision of this Policy does not comply with local law applicable to a particular Stryker business unit, that business unit may implement a separate policy to comply with local law, provided that the revised policy will conform with the principles contained within this Policy, as determined by appropriate personnel of the Stryker Human Resources and Legal departments. Where a local policy has not been implemented, all provisions of this Policy that comply with local law will remain in effect.

Basic policies

1. Harassment policy

- 1.1. Stryker is committed to providing a work environment that is free of discrimination, intimidation, and unlawful harassment. Harassment is a form of discrimination that is offensive, impairs employee engagement, undermines the integrity of Stryker's relationship with its employees and harms the productivity and stability of the organization.
- 1.2. Harassment on the basis of an employee's sex, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or any other legally protected characteristic will not be tolerated and is prohibited under this Policy.

2. Definitions and examples

- 2.1. Harassment means persistent and unwelcome conduct or actions on any of the bases in 1.2, above.
- 2.2. Sexual harassment is one type of harassment and includes unwelcome sexual advances, unwelcome physical contact of a sexual nature, unwelcome verbal or physical conduct of a sexual nature, unwelcome requests for sexual favors, and other unwelcome physical, verbal, or visual conduct of a sexual nature and/or directed at someone because of his or her sex.
- 2.3. Unwelcome physical, verbal or visual conduct of a sexual nature can include any of the following types of behavior:
 - explicit sexual propositions
 - sexual innuendo
 - sexually suggestive comments, epithets, or slurs
 - sexually oriented teasing or kidding
 - sexually oriented jokes
 - obscene gestures or language
 - obscene or sexually suggestive pictures or drawings
 - display of offensive sexually graphic materials not necessary for work
 - physical contact, such as patting, pinching or touching
- 2.4. Harassment on any basis exists whenever the following occur:
 - submission to harassing conduct is an explicit or implicit term or condition of employment
 - submission to or rejection of the conduct is used as the basis for an actual or implied employment decision, including job loss, demotion, or change in responsibility or benefits
 - conduct has the purpose or effect of unreasonably interfering with an individual's work performance or of creating an intimidating, hostile or offensive work environment

2.5. Other unlawful harassment includes any type of conduct that creates a hostile work environment characterized by offensive, obscene, or derogatory comments based on any of protected characteristics identified in section 1.2 above. This type of harassment would include, among other things, the following:

- making racial or ethnic slurs
- downloading, posting, viewing, publishing, photographing, printing, distributing of pornographic, obscene, offensive or inappropriate materials or materials that are sexual, ethnic, religious or racial in nature
- using offensive humor, including racial, religious, sexist or ethnic jokes
- making derogatory comments or remarks concerning another employee's sex, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression or any other legally protected characteristic
- making any communications or taking any other actions that are harassing or discriminatory

3. Responsibilities

- 3.1. The president or executive in charge of each division, subsidiary, or operating unit is responsible for ensuring that the Policy is followed. Responsibility for the coordination and implementation of the Policy for each division, subsidiary, or operating unit rests with the Human Resources leader for that location.
- 3.2. All managers, supervisors, team leaders, vendors, suppliers, and business partners are responsible for supporting and enforcing this Harassment Policy.
- 3.3. It is the responsibility of every employee to ensure that Stryker is in full compliance with this Policy. Any actions by employees which could cause Stryker to be in violation of the Policy may be subject to disciplinary action up to and including termination.
- 3.4. It is the responsibility of each employee who believes that he or she has been the object of sexual or other unlawful harassment to advise the alleged harasser to stop the unwanted activity and promptly report his/her concerns as outlined below.

4. Complaints

- 4.1. Complaints of acts of harassment or retaliation that are in violation of the Policy will be accepted in writing or orally, and anonymous complaints will be taken seriously and investigated. Anyone who has observed sexual or other unlawful harassment should report it immediately.
- 4.2. Any employee who wants to report an incident of harassment should promptly report the matter to his/her immediate supervisor, any Stryker manager, any member of Human Resources, any member of Stryker's compliance organization and/or through the Ethics Hotline. While employees are encouraged to first seek assistance from their immediate supervisor, the employee may, at any time, report his/her concern through any available reporting channel.
- 4.3. Any supervisor or manager who becomes aware of possible sexual or other unlawful harassment should promptly advise any member of Human Resources supporting the location.

5. Investigations

- 5.1. All complaints will be promptly and thoroughly investigated by the Human Resources leader for the applicable location or other designee charged with investigating such complaints.
- 5.2. Anyone registering a complaint is assured of:
 - protection against retaliation for reporting sexual and other unlawful harassment
 - the company's commitment to investigate the allegations and to take appropriate action
 - the company's intention to maintain confidentiality regarding the allegations, insofar as it is practical to do so
 - the company's intention to inform the complainant of the results of the investigation and whether action was taken

6. Resolutions

- 6.1. After reviewing the information gathered during the investigation and drawing appropriate conclusions, the company will take appropriate action and will communicate the resolution to the complainant and the alleged harasser, as appropriate.
- 6.2. A determination that misconduct occurred will result in appropriate disciplinary action, up to and including termination of employment.