

ARTHREX CHARITABLE DONATION POLICY

The Arthrex Compliance and Code of Ethics Policy govern charitable donations. Any donation shall be motivated by *bona fide* charitable purposes, such as supporting indigent care, patient education, public education, or the sponsorship of events where the proceeds are intended for charitable purposes. The provision of a charitable donation shall not be related directly or indirectly to the volume or value of purchases made by, or anticipated from, the recipient or any member of the recipient's organization. Sales personnel shall not participate in, or in any way influence, the decision to make a particular donation, but may offer limited input about the suitability of a proposed donation if so requested by the Compliance Department.

Arthrex may make monetary and product donations for purposes that benefit society and promote better health care or demonstrate good corporate citizenship. Donations are limited to tax-exempt organizations or, in rare instances, individuals engaged in a charitable mission.

Arthrex funds scientific research and education and provides support for educational, scientific and policymaking conferences and meetings. Educational grants are provided to conference sponsors or training institutions, not to individual Health Care Professionals.

Arthrex may fund general research grants appropriately reviewed and approved to study new therapeutic uses of approved devices. We will not use such research for promoting the unapproved use of our products and therapies.

Sales personnel may provide input about the suitability of a proposed grant or donation recipient or program, but may not control or unduly influence the decision to approve donations or grants. Where a research grant is used to support publication of clinical study results, financial support will be disclosed in the associated publication.