

ZIMMER BIOMET LOCAL INTERNAL REPORTING SYSTEM SUMMARY

1. Through which channels can I report?

In accordance with the Zimmer Biomet Group (the "Group") Code of Conduct, the Group has long had a globally managed reporting channel (the "Speak Up Hotline") through which you can report any evidence or suspicion of non-compliance with applicable regulations, protocols, procedures and internal controls, acts that are not in accordance with the Group's ethical principles and good business practices, as well as the commission of criminal offenses. More information here: <https://www.zimmerbiomet.eu/en/compliance.html#compliance-hotline>.

In conjunction with this Speak Up Hotline, Zimmer Biomet Spain, S.L.U. and Biomet Spain Orthopaedics SL (collectively "Zimmer Biomet") have implemented an Internal Local Reporting System (including a Local Reporting Channel) in line with current Spanish legal requirements under Law 2/2023.

Therefore, Recipients, Business Partners and Third Parties (see definition below) are free to (i) report through the Speak Up Hotline, in which case the information will be managed and investigated globally, or (ii) report through the Local Reporting Channel, in which case the information will be managed and investigated locally by Zimmer Biomet in Spain.

The Zimmer Biomet Local Internal Reporting System may be unique for both companies because they form a group as defined in Article 42 of the Commercial Code.

2. From where is the Local Reporting Channel managed?

The Zimmer Biomet Local Internal Reporting System is managed from Spain by Zimmer Biomet's Compliance Officer (the "System Manager").

Currently, the System Manager is Ms. Cristiane Barbosa.

3. How can I report through the Local Reporting Channel?

To report through the Zimmer Biomet Local Internal Reporting System, you must send an email to linea.cumplimiento@zimmerbiomet.com, available at any time, 24 hours a day, 7 days a week. This e-mail is managed directly by the System Manager.

You can also report locally through a face-to-face meeting with the System Manager that must be held within seven (7) calendar days. This face-to-face meeting will be documented or recorded in minutes that you will be able to verify before approval.

If the facts you wish to report involve, in any way, the System Manager or you believe that the System Manager has knowledge of such facts, you must report them through the Speak Up Hotline (<https://www.zimmerbiomet.eu/en/compliance.html#compliance-hotline>) globally managed.

4. Who can access the information presented through the Zimmer Biomet Local Internal Reporting System?

The information in the Zimmer Biomet Local Internal Reporting System can only be accessed by the System Manager. During the investigation phase, only those persons who are required to do so will have access to such information.

5. Who can report through the Local Reporting Channel?

Any person who has an employment relationship with Zimmer Biomet, whether under an open-ended employment contract or otherwise, as well as all shareholders and members of Zimmer Biomet's administrative, management or supervisory bodies, including non-executive members, as well as volunteers and paid or unpaid interns ("Recipients"), may report through the Local Reporting Channel.

Distributors, sales agents and other agents and representatives acting on behalf of Zimmer Biomet ("Business Partners") may also do so.

Similarly, self-employed persons employed by Zimmer Biomet, as well as anyone working for subcontractors, suppliers or intermediaries, former employees of Zimmer Biomet and applicants during recruitment or other pre-employment negotiations, where the information was obtained in the course of such solicitation ("Third Parties"), may also report through the Local Reporting Channel.

6. What can I report on the Local Reporting Channel?

You can report violations in the following areas: (i) public procurement, (ii) financial services, products and markets and prevention of money laundering and terrorist financing, (iii) product safety and compliance, (iv) transportation safety, (v) environmental protection, (vi) radiation protection and nuclear safety, (vii) food and feed safety, (viii) public health, (ix) consumer protection, protection of privacy and personal data, and security of networks and information systems, (x) competition, (xi) taxation, and (xii) any other non-compliance that may be considered a criminal offense or a serious or very serious administrative offense.

7. Can I report anonymously?

Yes, you can report through the Local Reporting Channel anonymously, i.e. you are not obliged to reveal your identity if you do not consider it appropriate.

In any case, to ensure anonymity you must follow some very simple rules:

- Do not report using your corporate email address or an email address that includes your first or last name or other identifying information; and
- Read the information you provide carefully before submitting it so that it does not contain your first or last name or other identifying information or details.

8. What kind of guarantees will I have if I report in good faith?

By reporting in good faith, you will be protected against retaliation. Retaliation is strictly prohibited. In addition, your identity will be kept confidential. Only strictly necessary persons will be able to access and investigate the information provided, including your personal data.

9. What will be the applicable procedure if I report through the Local Reporting Channel?

- You will receive an acknowledgement of receipt within seven (7) calendar days, unless this jeopardizes the confidentiality of the information.
- If the information you have provided does not relate to any of the above-mentioned infringements (section 6) it will be disregarded, and you will be informed of the reasons for such disregard.
- If the information you have provided relates to any of these breaches, the System Manager will make a preliminary assessment and determine the course of action to be taken. This will depend on the nature and seriousness of the facts you have reported but will always be handled in accordance with the above safeguards (section 8) and by the most appropriate person or team (internal or external).
- The time limit for responding to the investigation proceedings may not exceed three (3) months from the date you received the acknowledgement of receipt or, if it was not sent to you, three (3) months from the expiration of the seven (7) calendar day period from the date you reported, except in cases of special complexity in which the time limit may be extended up to three (3) additional months.
- Upon completion of the investigation, if the violation you reported is proven to be justified, appropriate action will be taken in accordance with the Group's procedures and applicable local law.

10. What rights does the person about whom I am reporting have?

The reporting person shall have the right to be informed of the acts or omissions imputed to him/her and to be heard at any time. Such communication shall take place at such time and in such manner as is deemed appropriate to ensure the proper conduct of the investigation. In addition, all information will be processed and investigated respecting the presumption of innocence and your right to honor. The confidentiality of your identity will also be guaranteed.

11. Will the person I am reporting know who has reported?

The person you report will not know your identity. If you report in good faith your identity will be kept confidential.

12. Can I use external reporting channels?

Yes, while Zimmer Biomet expects you to feel comfortable using the Local Reporting Channel or, if applicable, the Speak Up Hotline, you can also report through the external channels of the relevant European or national authorities. For example, the European Anti-Fraud Office (OLAF), the Independent Whistleblower Protection Authority, the National Anti-Fraud Coordination Service (SNCA), the Anti-Fraud Office of Catalonia (OAC), the Andalusian Anti-Fraud Office (OAAF), the Office for the Prevention and Fight against Corruption in the Balearic Islands (OAIB).

13. How is my personal data protected when I report on the Local Reporting Channel?

All information regarding the management and protection of your personal data is contained in the data protection notice ([Home \(zimmerbiomet.com\)](#)).