



Code of Ethics & Business Conduct Policy
Revised 2021

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Nothing in this Code of Ethics & Business Conduct Policy (“Code”) prevents or restricts the Company from taking disciplinary action on matters relating to employee conduct, whether or not that disciplinary action is discussed in this document. Violation of these principles is discussed in your Employee Handbook. If required, disciplinary actions may include termination of employment. If any part of this Code becomes unenforceable under the law of a particular jurisdiction, that section may be revised or deleted without affecting the remaining sections.

Message from the President & CEO

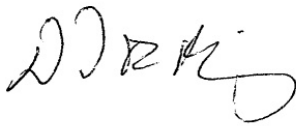
Integrity has always been an important characteristic at OrthoPediatrics. It is one of the reasons we are an extraordinary company. Operating with integrity imposes important legal and ethical responsibilities that extend to customers, to our fellow employees, to the healthcare providers and public agencies with whom we do business, and to the public at large. Accordingly, it is OrthoPediatrics' policy that its directors, officers, employees, consultants, distributors, representatives and agents behave ethically and follow the laws, regulations, policies and procedures that affect their jobs.

Our Code of Ethics & Business Conduct Policy ("Code") is designed to provide important guidance in good business practices wherever we operate worldwide. It is essential that you take time to read and understand it. Every OrthoPediatrics director, officer, employee, consultant, distributor, representative and agent is responsible for observing this Code and the policies, procedures and programs that support it. Any questions should be directed to your immediate supervisor, the Company's Human Resources Department, or the Company's Legal Department.

You can report suspected violations by filing a report using [OrthoPediatrics' Compliance Hotline web reporting tool](#), available 24 hours a day, seven days a week, or by calling +1-844-421-4762.

By dedicating ourselves to the principles outlined in this Code and always to *Do the Right Things "Right"*, we will maintain our reputation as the pediatric orthopedics leader in innovation, quality, and integrity. It all starts with you.

Best regards,

A handwritten signature in black ink, appearing to read 'David Bailey', with a stylized flourish at the end.

David Bailey
President & CEO

What OrthoPediatrics Expects from You

One of the behaviors we expect from all of the Company's directors, officers, employees, consultants, distributors, representatives and agents (collectively, "Representatives") is to *Do the Right Things "Right"* by focusing on high standards of quality and execution, to operate with integrity, and to hold ourselves accountable for individual performance.

Do the Right Things "Right" Examples

- Patient safety always comes first.
- Follow the policies and procedures that apply to your job.
- Avoid even the appearance of impropriety.
- Don't buy business.
- Practice transparency.
- Respect our customers and follow their policies.
- Admit mistakes and take the steps necessary to correct them.
- Cooperate with internal and legitimate external audits and investigations.
- Be a leader. Recognize and act on teaching moments.
- Keep your promises to our customers, to OrthoPediatrics, and to each other.
- Report any suspicious or known misconduct within the company to the Compliance Hotline.
- Respect our fellow Representatives and maintain awareness to harassment and unlawful discrimination.

What is Your Role?

Your Role in Owning OrthoPediatics' Global Ethics & Compliance Program

The written OrthoPediatics programs must be considered first, unless a customer's policy or local law or regulation is stricter.

1. *Read, understand and take ownership of this Code of Ethics & Business Conduct Policy ("Code of Conduct" or "Code" hereafter).*

OrthoPediatics expects its Representatives to do what is right, treat people fairly, perform their jobs with diligence and honesty, and otherwise conduct OrthoPediatics' business in a manner that is above reproach. OrthoPediatics' principles of honesty and integrity are outlined in this Code of Conduct. By reading, understanding and taking ownership of this Code, we each take responsibility for sharing these values and for our own success, as well as the continued success of OrthoPediatics.

This Code of Conduct is the cornerstone of OrthoPediatics' Global Ethics & Compliance Program ("Program"). This Code provides general principles to guide all of us in making ethical and sound business decisions. It is not meant to address every specific situation. Each of us must use common sense and good judgment and ask for advice when necessary. The Program is also supported by a series of policies, procedures, programs and trainings to provide relevant information for specific responsibilities. The applicable policies, procedures and programs referenced throughout this Code, indicated in bold, are available from the Company's Legal Department. It is your responsibility to know them. Additional Program documents will be developed as needed.

2. *Understand the intent and spirit behind the laws and the efforts of OrthoPediatics, government regulators, voluntary trade organizations and healthcare professional organizations to keep our industry viable and respected.*

3. *Report violations of this Code of Conduct without fear of retaliation.*

OrthoPediatics investigates and addresses reported and suspected violations of this Code. Where allowable by law, you are encouraged to report violations of this Code to management without fear of retaliation. OrthoPediatics will conduct a prompt and, wherever possible, confidential investigation of all reports. Retaliation in any form will not be tolerated against an individual who reports a violation of this Code, applicable law or regulation.

Your Role in Serving Patients

1. Provide quality products in a timely manner.

Ensuring a patient's health and well-being is our first and foremost objective. It is a big responsibility and one that OrthoPediatics takes very seriously. It is OrthoPediatics' purpose to design, manufacture and deliver products of the finest quality. OrthoPediatics' quality systems are described in its Quality Manual. The Quality Manual outlines authorities and responsibilities, quality system procedures and instructions, management review, and system effectiveness audits. Management is responsible for training employees on the parts of the quality system that apply to their jobs. It is your responsibility to understand if and how the quality system applies to your responsibilities.

2. Understand your responsibilities and be accountable for results.

OrthoPediatics strives to provide safe and effective medical products to patients around the world. Patient safety and well-being are our highest priorities. Each of us must take responsibility for understanding and performing our own jobs to the best of our ability, every day. We must also be accountable for our actions. If at any time you have questions, OrthoPediatics encourages you to consult with your supervisor, manager, department head or the Company's Human Resources department.

3. Safeguarding Patient Information.

OrthoPediatics generally does not need a healthcare provider to disclose confidential patient information in connection with its sales activities and requests that a healthcare provider so inform its personnel. Regardless, we recognize the need to safeguard any patient information to which our Representatives may have incidental access in the course of OrthoPediatics' relationship with a healthcare provider and OrthoPediatics is committed to cooperating with them in that regard. As an OrthoPediatics Representative, part of your necessary responsibilities may include the lawful collection of protected personal information for purposes such as fulfilling an order for a custom medical device, device tracking, clinical research, quality assurance, marketing, research and development, human resources, information technology, customer relations or sales. Accordingly, you agree to safeguard and keep strictly confidential any patient information that you may have opportunity to access or observe incidentally in your relationship with a healthcare provider, using the degree of care that it uses to maintain the confidentiality of OrthoPediatics' own confidential information.

Your Role in Fostering Best Business Practices & Conflict of Interest Prevention

1. Deal honestly and fairly in business.

OrthoPediatrics is fully committed to our tradition of developing strong customer relationships based on trust, knowledge, integrity and the highest quality medical devices in the world. It is a guiding principle at OrthoPediatrics to deal with our customers honestly and fairly.

To maintain our ethical business practices worldwide, OrthoPediatrics will continue to seek the guidance of industry-related organizations and may adopt those guidelines into our Program.

2. Follow a customer's internal policies and requirements, and those of individual political jurisdictions such as states, provinces, countries or medical societies first with respect to doing business in their facilities, with their employees or with their members if more stringent than OrthoPediatrics policies.

3. Follow OrthoPediatrics Policy & Procedures for Complying with AdvaMed's Code of Ethics on Interactions with Healthcare Professionals, which has been designed based on applicable laws and medical device industry standards with respect to meals, consulting arrangements, grants, educational meetings and business meetings as well as bans on providing gifts, entertainment and recreation.

OrthoPediatrics defines a Healthcare Professional(s) as an individual or entity: a) That is involved in the provision of healthcare services and or items to patients; and b) That purchases, leases, recommends, uses, arranges for purchase or lease of, or prescribes the Company's products. The phrase Healthcare Professional includes both persons providing services (such as licensed physicians) and persons who do not provide services directly but who are involved in the decision to purchase, lease, or recommend the Company's products. Examples of Healthcare Professionals include, but are not limited to, physicians, physician assistants, nurses and purchasing personnel.

4. Practice transparency.

At OrthoPediatrics we have policies, procedures and training materials designed to help our Representatives appropriately interact with Healthcare Professionals in consulting arrangements for such things as product development and physician education. We have also established a tracking system and training to comply with disclosure laws covering payments to Healthcare Professionals.

5. All corporate donations must comply with OrthoPediatrics policies and any applicable laws or guidance, such as those outlining appropriate interaction with Healthcare Professionals.

6. Adhere to OrthoPediatrics' Anti-Corruption Policy including the prohibitions and or restrictions on giving or receiving gifts, meals or entertainment.

7. Take care when interacting with government officials so that the interactions are not considered bribery, which is unlawful. See section "Interacting Honestly with Governments and Regulators," for more information.

8. Follow applicable OrthoPediatrics Accounting Policies and Procedures.

It is OrthoPediatics' policy to comply with all financial and accounting regulations that apply to our Company worldwide. The OrthoPediatics Finance and Accounting policies guide our activities in this area. Employees must follow the **Travel & Business Expense Policy** for all expenses incurred on behalf of OrthoPediatics.

- 9. *It is OrthoPediatics' policy to protect our intellectual property and to respect the intellectual property of others.***

- 10. *OrthoPediatics' Representatives have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Since not every situation is clear, whenever there is any question about a possible conflict of interest, consult your manager, a Human Resources representative, or the Company's Legal Department. In the event a conflict or potential conflict is found to exist, the matter will be resolved in a manner which considers the interests of the employee and OrthoPediatics.***

Your Role in Interacting Honestly with Governments and Regulators

1. *Assure regulatory compliance and comply with applicable laws and regulations.*

The provision of medical care and associated equipment and devices are regulated and monitored by a variety of government agencies around the world. It is OrthoPediatics' policy that all OrthoPediatics Representatives understand and comply with laws, regulations and government directives that apply to our business activities. OrthoPediatics is committed to cooperating in an open, helpful and effective manner with regulatory agencies on matters of regulatory policy, compliance, product submissions and product performance. If you have any questions about how your responsibilities comply with a law or regulation, please ask your manager or the Company's Legal Department. It is OrthoPediatics' expectation that all OrthoPediatics Representatives provide accurate, relevant information and records regarding the Company as requested by government regulatory bodies that are legally authorized to ask for such information.

2. *Appropriately handle third-party inquiries (e.g., government and media).*

OrthoPediatics will respond to legitimate third-party inquiries in a cooperative and responsible manner. OrthoPediatics management must be informed immediately about any government, regulatory or media inquiry in order to properly and completely respond. If you are contacted by an outside individual or agency regarding OrthoPediatics, please report immediately to OrthoPediatics management or directly to the Company's Legal Department. Media inquiries should be forwarded to the OrthoPediatics President & CEO, Legal Department, or the Human Resources Department.

3. *Cooperate with any internal or legitimate external investigation.*

It is OrthoPediatics' policy that each Representative is responsible for maintaining accurate records and documentation concerning OrthoPediatics and cooperating fully with any internal or legitimate external auditors, investigators and governmental authorities concerning the Company.

4. *Political Interactions.*

OrthoPediatics Representatives should not attempt to represent OrthoPediatics' position or stance on issues in the political arena without the approval of the Company's President & CEO. Moreover, OrthoPediatics Representatives shall adhere to the prohibitions concerning political contributions, and or prohibitions of providing gifts, entertainment and or recreational activity to government officials contained in OrthoPediatics' *Anti-Corruption Policy*.

5. *Engage ethical business partners and associates.* OrthoPediatics shall verify its business partners and associates are qualified, legitimate, and reputable.

6. *Follow OrthoPediatics' Anti-Corruption Policy, which, in part, promotes compliance with this Code and a commitment to conducting worldwide operations in accordance with the highest ethical standards and in compliance with all applicable U.S. and non-U.S. laws and regulations, including the U.S. Foreign Corrupt Practices Act ("FCPA"), U.K. Bribery Act 2010, and other anti-corruption laws.*

Your Role in Reporting of Illegal or Unethical Behavior & Fostering a Productive Work Environment

- 1. It is OrthoPediatrics' policy to encourage the reporting of any Illegal or Unethical Behavior. You can report suspected violations by filing a report using [OrthoPediatrics' Compliance Hotline web reporting tool](#), available 24 hours a day, seven days a week, or by calling +1-844-421-4762.**
- 2. Treat your fellow OrthoPediatrics Representatives, customers, vendors and all other third parties with respect in order to foster a productive work environment. Moreover, OrthoPediatrics is committed to providing its Representatives with a work environment that is free from discrimination and harassment of any kind, including harassment based on an individual's race, color, religion, sex, sexual orientation, national origin, age, disability, or other protected basis. OrthoPediatrics strictly prohibits and will not tolerate in any fashion, harassment of any Representative by another Representative (regardless of position or authority). Similarly, OrthoPediatrics will not tolerate harassment of its Representatives by any customer, vendor or other third party.**