

OrthoPediatrics' Policy and Procedures (“Policy”) for Complying with AdvaMed’s Code of Ethics on Interactions with Healthcare Professionals

Purpose & Scope:

To establish a Policy to ensure OrthoPediatrics Corp.’s (“Company”) interactions with healthcare practitioners are conducted with transparency and in compliance with AdvaMed’s Code of Ethics on Interactions with Healthcare Professionals (“Guidelines”).

Training:

The Company’s employees, distributors and agents thereof who conduct business on the Company’s behalf shall undergo annual training (either in person or via electronic communication such as a webinar) to familiarize themselves with the AdvaMed Guidelines and this Policy. Such training shall be conducted by the Company’s Healthcare Compliance Officer and or General Counsel or by a designee of either officer.

Investigating Non-Compliance:

A Company employee, distributor or agent thereof who becomes aware of an alleged violation of the AdvaMed Guidelines shall promptly communicate the alleged violation to the Company’s Healthcare Compliance Officer and or General Counsel.

Upon receiving notice of the alleged violation, the Company’s Healthcare Compliance Officer or General Counsel or someone designated by either officer shall determine if the facts and circumstances surrounding the alleged violation constitute an AdvaMed violation.

Corrective Action in Response to Employee Non-Compliance:

If the Healthcare Compliance Officer or General Counsel determines an AdvaMed Guidelines violation has occurred by a Company employee, the Healthcare Compliance Officer or General Counsel shall report the findings to the Company’s Human Resources Department.

Company employees who violate AdvaMed Guidelines and this Policy will be subject to disciplinary action by the Human Resources Department, up to and including termination, pursuant to the Company’s Employee Handbook. If the Company employee’s AdvaMed violation is not sufficient to warrant termination, the subject employee, in addition to being subject to other disciplinary action, will be required to undergo additional AdvaMed Guidelines training.

Failure to report a known violation of the AdvaMed Guidelines by a Company employee is a violation of this Policy and can result in disciplinary action by the Human Resources Department, up to and including termination of the subject employee, pursuant to the Company’s Employee Handbook. Additionally, if the subject employee’s manager(s) or supervisor(s) lack of diligence or lack of supervision contributes to a subordinate’s violation of the AdvaMed Guidelines, it shall constitute a violation of this Policy and can result in disciplinary action, up to and including termination of the subject employee by the Human Resources Department, pursuant to the Company’s Employee’s Handbook.

Corrective Action in Response to Distributor or Agent’s Non-Compliance:

If the Healthcare Compliance Officer or General Counsel determines an AdvaMed Guidelines violation has occurred by a distributor or agent thereof, the subject officer(s) shall weigh the severity of the violation to determine if it warrants termination of the distributor’s Distribution Agreement or other contractual or business relationship with the Company, or if the subject distributor will be required to undergo additional AdvaMed Guidelines training.