



Standard Operating Procedure For Code of Business Conduct Policy

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1 Purpose

This Code of Business Conduct Policy pertains to SIGN Fracture Care International (SIGN or Company) and intends to address common business practices that involve interactions with third parties including Health Care Professionals. The intent of the Code of Business Conduct is to be consistent with the SCM-001, Compliance Manual, as well as all applicable state and local laws.

2 Scope

SIGN shall adopt this Code of Business Conduct & Ethics to use as guidance in business transactions with third parties including Health Care Professionals. SOP-037, Health Care Professional Travel Policy and SOP-038, Customer Relationship Policy provide specific guidance for particular situations.

3 Definitions

N/A

4 Responsibilities

SIGN prohibits employees from paying or accepting bribes. Violations of this rule are subject to discipline, up to and including termination of employment.

Each SIGN employee who believes that a prohibited act under this Code has occurred shall promptly report such belief to the Chief Compliance Officer (CCO) or the Chief Executive Officer (CEO). If the belief is that the occurrence involves the CCO or the CEO, the employee should report the event to the Risk Management Committee of the SIGN Board of Directors (RMC).

The SIGN Compliance Committee (SCC) shall review and investigate any such reported prohibited act, without the participation of any employee who may be the subject of such report. If the SCC determines that any such act represents a violation under this Code, then SIGN will take appropriate remedial or disciplinary action. The SCC will provide a report of activities to the RMC.

SIGN will disclose any such violation and the remedial or disciplinary action taken, to the extent required by federal or other applicable laws. If the SCC determines that any such act represents a violation under this Code, but does not believe that any remedial or disciplinary action is necessary or desirable, then the CCO shall promptly disclose the violation or waiver to the RMC and the SCC's rationale for its decision. If the SCC determines that any such act represents a violation under this Code, but the SCC agrees to waive compliance with a provision of the Code on behalf of the employee, then the CCO shall promptly disclose the violation or waiver to the RMC and the SCC's rationale for its decision. Furthermore, the CCO shall also disclose to the RMC if the SCC fails to investigate or take action within a reasonable period-of-time after learning of any such alleged prohibited act under this Code.

We expect all SIGN employees to provide full assistance and disclosure to the SCC, the Company, the RMC, and its internal and external auditors in connection with any review of compliance with this Code.

5 Procedure

5.1 Conflicts of Interest

Every employee has a duty to avoid business, financial, or other direct or indirect interests or relationships that conflict with the interests of SIGN or which divide his or her loyalty to SIGN. A conflict or the appearance of a conflict of interest may arise in many ways.

Each person must deal at arm's length with the Company and should report to the CCO or the CEO any perceived or actual failure to operate in such a manner. If it is the belief that the occurrence involves the CCO or the CEO, the person should report the event to the SIGN Board of Directors any conflict or any appearance of a conflict of interest on his or her part. SIGN employees must avoid or terminate any activity, which even appears to present such a conflict, unless, after such disclosure to Company, it is determined that the activity is not harmful to the Company or otherwise improper.

The end-result of the process of disclosure, discussion, and consultation may well be approval of certain relationships or transactions on the ground that, despite appearances, they are not harmful to the Company. However, SIGN prohibits all conflicts and appearances of conflicts of interest, even if they do not harm the Company, unless they have gone through this process.

5.2 Conduct of Business and Fair Dealing

No SIGN employee shall compete with the Company by providing service to a competitor as an employee, officer, or senior manager or in a similar capacity.

No SIGN employee shall profit or assist others to profit from confidential information or business opportunities that are available because of service to the Company

No SIGN employee shall improperly influence or attempt to influence any business transaction between the Company and another entity in which a SIGN employee has a direct or indirect financial interest or acts as an employee, officer, or director or in a similar capacity.

No SIGN employee shall take unfair advantage of any customer, supplier, competitor, or other person through manipulation, concealment, misrepresentation of material facts, or other unfair-dealing practice.

5.3 Gifts

No SIGN employee shall solicit or accept gifts, payments, loans, services, or any form of compensation from suppliers, customers, competitors, or others seeking to do business with the Company. Social amenities customarily associated with legitimate business relationships are permissible. These include the usual forms of entertainment such as lunches or dinners as well as occasional gifts of modest value. While it is difficult to define "customary," "modest", or "usual" by stating a specific dollar amount, common sense should dictate what qualifies as extravagant or excessive. If a disinterested third party would be likely to infer that it affected the judgment of an employee, then it is too much. All business dealings must be arm's length and free of any favorable treatment resulting from the personal interest of our employees.

5.4 Compliance with Laws and Regulations

Consistent with SIGN business philosophy, it is the policy of SIGN to comply with the laws of each country in which our companies do business. As appropriate and applicable, each SIGN employee shall comply with all applicable laws, rules, and regulations, and shall use all

reasonable efforts to oversee compliance by other SIGN employees with all applicable laws, rules, and regulations.

5.5 Use of Non-Public Information and Disclosure

A SIGN employee who knows important information about the Company that is not disclosed to the public must keep such information confidential. It is a violation of United States law to purchase, sell, or give away SIGN confidential information.

SIGN employees shall maintain the confidentiality of any non-public information learned in the performance of their duties on behalf of the Company, except when there is an authorization of legal mandate for disclosure.

5.6 Use of Company Funds, Assets and Information

Each SIGN employee shall protect the Company’s funds, assets, and information and shall not use the Company funds, assets, or information to pursue personal opportunities or gain.

SIGN employees will not use Company funds, assets, or information for any unlawful purpose.

SIGN employees will not make false or artificial entries in the books and records of the Company for any reason, and no employee shall engage in any arrangement that results in such prohibited act.

5.7 Training

As applicable, each SIGN employee shall complete training on the SCM-001, Compliance Manual; SOP-036, Code of Business Conduct Policy; SOP-037, Health Care Professional Travel Policy; SOP-038, Customer Relationship Policy; and all federal, state, and local laws. Any formal training records shall be stored in the employee’s training file.

7 References

- SCM-001, Compliance Manual
- SOP-037, Health Care Professional Travel Policy
- SOP-038, Customer Relationship Policy

8 Document History

Rev.	Effective Date	Description	Approved	DCO #
00	12/16/2013	New Document – As part of the implementation of the Compliance Program and Plan, certain SOPs were identified as necessary to provide compliance guidance in various aspects of business operations.	SB	DCO-128-13
00	4/21/2015	Updated to correct name of Risk Assessment Committee to Risk Management Committee; General editorial fixes.	SB	DCO-067-15 Level 1
00	4/12/2016	Section 2 Scope, added references to SOP-037, Health Care Professional Travel Policy and SOP-038, Customer Relationship Policy. References were shifted to the correct location in conformance with the SOP template; nomenclature for referencing other SIGN documents was modified to concur with the template.	SB	DCO-067-16 Level 1

SOP-036-02

Rev.	Effective Date	Description	Approved	DCO #
00	7/12/2016	Update to new SOP format and cover page design.	CRS	DCO-085-16 Level 1
01	4/11/2018	Include references to SOP-037, Health Care Professional Travel Policy, and SOP-038, Customer Relationship Policy, to Section 5.7 as included in required training.	SB	DCO-077-18 Level 2
02	8/23/2018	Added "SIGN prohibits employees from paying or accepting bribes. Violations of this rule are subject to discipline, up to and including termination of employment." Also made grammatical corrections throughout document.	SB	DCO-132-18 Level 2