

Declaration of Adoption of Comprehensive Compliance Program  
Pursuant to California Health and Safety Code Section 119402

MicroPort Orthopedics, Inc. ("MPO") is in the business of designing, manufacturing and selling orthopaedic medical devices. As a medical device manufacturer, MPO has developed a Comprehensive Compliance Program that is specific to the nature of the business as a medical device manufacturer and consistent with the United States Department of Health and Human Services Office of Inspector General Compliance Program Guidance for Pharmaceutical Manufacturers.

The purpose of our Compliance program is to prevent and detect violations of law or company policy. Our Compliance program is based upon the principles set forth in the Advanced Medical Technology Association Code of Ethics on Interactions with Health Care Professionals ("AdvaMed Code") and the Company's Code of Business Conduct. The AdvaMed Code is substantially equivalent to the Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals (PhRMA Code), but reflects the unique interactions between medical technology companies and health care professionals. MPO's Code of Business Conduct is our statement of ethical and compliance principles that guide our daily operations and articulates our fundamental principles, values and framework for action within our organization.

Additional compliance guidance is communicated through our Compliance Manual for U.S. and Canadian Operations, which applies to interactions with health care professionals to the extent that they provide services or medical technologies in the United States or Canada. This guidance establishes explicit limits on gifts, promotional materials or items, or activities that MPO or its representatives may provide to an individual health care professional. MPO updates its policies on an ongoing basis.

MPO declares that to the best of its knowledge, MPO is in compliance with the provisions of California Health and Safety Code Section 119402 as of October 9, 2015.

To access a copy of MPO's Code of Business Conduct or a copy of this Declaration of Adoption of Comprehensive Compliance Program, please visit our website at <http://www.ortho.microport.com/compliance#policies>. Copies of these documents may also be obtained by contacting MPO headquarters at 1-866-830-0890 or by e-mailing [ethics@ortho.microport.com](mailto:ethics@ortho.microport.com).