



# UK Modern Slavery Act and California Transparency in Supply Chains Act Statement

## DISCLOSURE REQUIREMENTS UNDER THE UK MODERN SLAVERY ACT 2015 AND CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010 FOR THE YEAR ENDED DECEMBER 31, 2022

### UK MODERN SLAVERY ACT 2015 ("UK ACT")

This statement is made pursuant to Section 54, Part 6 of the UK Act and sets out the steps ZimVie has taken to ensure that slavery and human trafficking is not taking place in its supply chains or any parts of its business. ZimVie Inc. (together with its subsidiaries, "ZimVie" or the "Company") is a global life sciences leader in the dental and spine markets.

### CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010 (SB 657) ("CALIFORNIA ACT")

Under the California Act, companies of a certain size doing business in the State of California are obligated to disclose their efforts to eradicate slavery and human trafficking from their direct product supply chains for the goods that they offer for sale.

### COMPANY DESCRIPTION

ZimVie was founded in March 2022 as an independent, publicly traded spin-off of the dental and spine business units from Zimmer Biomet Holdings, Inc. From its headquarters in Westminster, Colorado, and additional facilities around the globe, ZimVie serves customers in over 70 countries worldwide with a robust offering of dental and spine solutions including differentiated product platforms supported by extensive clinical evidence. The steps described in this statement include steps taken by Zimmer Biomet Holdings, Inc. prior to its completion of the spin-off of ZimVie.

### COMPANY DISCLOSURE

ZimVie strives to achieve and maintain high standards of corporate integrity and ethical behavior. The Company takes the issues of slavery and human trafficking very seriously and will continue doing its part by responsibly managing its supply chain in an effort to eradicate human trafficking and slavery. ZimVie does not endorse any form of modern slavery in its operations or in its supplier networks. ZimVie takes a number of steps with respect to verification of its supply chain and certification of materials to ensure suppliers are operating in an ethical manner, including the following:

- 1. Verification** – ZimVie expects that its suppliers will conduct their businesses in a lawful manner and in compliance with high standards of integrity and ethics. In order to establish guidelines for such standards, ZimVie has established a [Code of Supplier Conduct](#). The Code of Supplier Conduct requires supplier compliance with important legal, ethical, behavioral and other requirements. Specifically, the Code of Supplier Conduct states that suppliers must not support, promote or engage in the practice of slavery or human trafficking, and it requires suppliers to comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

ZimVie suppliers are further expected to take reasonable and necessary steps to help ensure that their sub-contractors and sub-suppliers conduct business in compliance with the Code of Supplier Conduct. Suppliers are expected to promptly take corrective action to address any deficiencies identified with respect to compliance with ZimVie's Code of Supplier Conduct, to maintain necessary records and documentation to demonstrate their compliance with the Code of Supplier Conduct and to report noncompliance or concerns regarding questionable behavior to their ZimVie Sourcing representative or via the ZimVie Compliance Hotline ([compliance.hotline@zimvie.com](mailto:compliance.hotline@zimvie.com)). In the Code of Supplier Conduct, slavery, human trafficking and child labor are specifically prohibited. If a supplier is found to be in violation of the Code of Supplier

Conduct, ZimVie will take all appropriate measures to address the violation. ZimVie reserves the right to terminate its relationship with any supplier for failure to comply with the Code of Supplier Conduct.

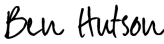
- 2. Audits** – ZimVie has implemented a risk-based approach in conducting periodic (typically triennial) supplier audits, which include an evaluation of compliance with prohibitions against slavery and human trafficking in supply chains. As an output of our periodic monitoring, ZimVie was satisfied that the risk of slavery and/or human trafficking in its direct supplier base was low. ZimVie expects to continue the practice of monitoring its global supply chain and ZimVie’s Code of Supplier Conduct states that ZimVie, or a third party designated by ZimVie, may conduct periodic audits, inspections, and/or reviews of suppliers’ facilities. In addition, to the extent that ZimVie suspects or receives notice that a supplier is involved in slavery and/or human trafficking activities, ZimVie will conduct an inquiry, or third party audit if warranted, and take appropriate action as required by law.
- 3. Certifications** – ZimVie requires its suppliers to represent and certify, by acceptance of the Company’s purchase order terms and conditions, that in providing goods and services under the purchase order, the supplier has complied and will comply with all applicable federal, foreign, state and local laws, rules and regulations, including, without limitation, all anti-slavery and anti-human trafficking laws.
- 4. Accountability** – ZimVie has established a Code of Business Conduct and Ethics ([ZV0002 ZimVie Code of Business Conduct and Ethics Final.pdf](#)), which applies to all ZimVie personnel, including officers, directors and employees (including full-time, part-time temporary and contract employees) (collectively, "Team Members"). ZimVie expects its business partners and contractors to share the general principles stated in the Code of Business Conduct and Ethics. These general principles require ZimVie Team Members to comply with all applicable laws and regulations, including but not limited to those relating to human trafficking and slavery. The ZimVie Supplier Code of Conduct specifically calls out child labor, forced labor (slavery) and human trafficking.

The Code of Business Conduct and Ethics explains that if a Team Member needs guidance on a legal or ethical question or knows of or suspects illegal or unethical activity, he or she should consult with or report the matter to his or her manager, supervisor, a representative of the Legal or Compliance Department, or via the Company’s Speak Up Hotline, which is available 24 hours a day, seven days a week. All reports of alleged violations (which can be made anonymously) will be investigated by ZimVie. Disregard or deliberate ignorance of the law, failure to report known or potential violations and/or failure to cooperate in an investigation will not be tolerated and may lead to disciplinary action, including termination of employment.

- 5. Training** – All Team Members are trained annually on the Code of Business Conduct and Ethics. The Code of Business Conduct and Ethics requires Team Members to comply with all applicable laws and regulations, including but not limited to those relating to human trafficking and slavery. Team Members who have direct responsibility for supplier management are also trained on the ZimVie Code of Supplier Conduct. The Code of Supplier Conduct informs suppliers that ZimVie will take all appropriate measures to address any violations.


ZimVie strives to continuously improve its programs and practices to ensure compliance with applicable laws and regulations and the Company’s high ethical standards, and to meet the expectations of its customers, stockholders, and other stakeholders.

**ZimVie Inc.**

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**Biomet 3i UK Ltd.**

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