

Code of Conduct of Osteosynthesis and Trauma Care Foundation (OTC Code of Conduct)

1 Scope of this document

This Code of Conduct functions as a guide for all individuals with respect to their roles and responsibilities related to our various programs and activities. The primary purpose of this Code of Conduct is to ensure compliance with ethical standards and all applicable laws and regulations. OTC encourages ethical business practices and is socially responsible. OTC tolerates no unlawful inducement (no toleration of kickbacks).

The OTC Code of Conduct is used as a guide for planning and implementing OTC activities. It is used to define appropriate relationships with private sector donors and to determine appropriate financial planning and expenditures.

The OTC Code of Conduct is applicable for all HCPs, each employee and member of the Board of Trustees, member of an OTC organizational body (hereafter named, "OTC representative"); all are required to sign the Code of Conduct, thereby committing to compliance in both letter and spirit.

2 General principles

2.1 Mission

The Mission of the OTC is to advance osteosynthesis and trauma care through education, training, research, scientific study, symposia, publications, best clinical practices and related humanitarian activities. OTC is a non-profit Foundation registered in Switzerland.

2.2 Commitments

2.2.1 Financial commitments

All activities, programs, projects and related financial costs and expenditures directly relate to the Mission of the OTC and are "appropriate, necessary, modest and reasonable" for the specific purpose of the OTC activity to which it relates.

No improper payments will be made to government or non-government officials, employees or any other OTC representative.

The OTC Reimbursement Policy complies with this Code of Conduct.

2.2.2 Ethical guidelines

OTC representatives will not act against any law, rules, guidelines of the Swiss Academy of Medical and Natural Sciences (www.samw.ch), the Advamed code of ethics or the Eucomed code of business.

OTC staff and Board of Trustees do not have to abide by the Advamed code of ethics or the Eucomed code of business as long as they do not interact with HCPs.

No OTC representative will ever use bribery or granting of improper favors to achieve the mission of OTC Foundation.

2.2.3 Conflict of interests

As a non-profit entity, OTC is dependent upon financial aid and technical support from external sources for many programs and activities. These sources may include business organizations. While some of these business organizations may maintain an economic interest in the programs and activities of the OTC, it is imperative that the OTC maintains an independent, transparent and rational relationship with all external donors.

Understanding the relationship between the OTC and private sources of donations, all OTC activities should be designed in a manner that prevents even the appearance of impropriety. It is essential to the credibility of the OTC that all activities be free from both real and apparent influence of individuals or business organizations.

2.2.4 Employment practices

It is OTC's policy to comply fully with all applicable labor laws and other statutes regulating the employer-employee relationship and the workplace environment. OTC grants equal opportunities irrespective of race, national origin, gender, sexual orientation, religion or age.

2.2.5 Acceptance of gifts

OTC representatives may not offer or accept gifts or favours worth over CHF 100.-, financial or otherwise, in return for preferential treatment or action.

2.2.6 Participation in OTC Foundation events

- a) Education Courses and other events of the OTC are open to the public and any attendee. All individuals must formally register.
- b) OTC Committee Meetings shall only be attended by members of the respective OTC Committee and OTC support staff. Experts can be invited on case to case basis.

3 Implementation Principles

Compliance with OTC regulations and ethical guideline (see article 2.2.2) is the responsibility of each person acting for and on behalf of the Foundation. Only compliant behaviour ensures the value of our foundation permanently.

3.1 Reporting of violations

OTC's representatives report violations of laws, rules, regulations or the Code of Conduct internally, so that such matters can be properly addressed. The reporting can be done to the Chief Compliance Officer. Violations by the Chief Compliance Officer should be reported to the cantonal authority¹.

No reprimands are done against the person who reported such violations in good faith.

3.2 Violations against this Code of Conduct

Should violations against this Code of Conduct occur, appropriate measures will be taken against the violator. These measures may include counseling, oral or written reprimands, warnings, or suspension without remuneration, termination of contract, and legal action.

3.3 Abiding by this Code of Conduct

Accordingly, all individuals agree to abide by this Code of Conduct when participating in any OTC activity, as well as for all related financial costs, expenditures and reimbursements.

4 Final provisions and Applicable legislation

4.1 This code of conduct is governed by Swiss law.

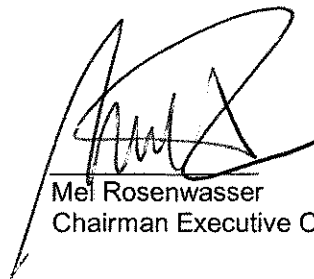
4.2 It enters into force on February 1st 2010.

4.3 The exclusive place of jurisdiction shall be Bern.

February 5th 2010



Emanuel Zloczower
Chairman of Board of Trustees



Mel Rosenwasser
Chairman Executive Committee

¹ www.so.ch/departemente/volkswirtschaft/berufliche-vorsorge-und-stiftungsaufsicht.html