



SYMMETRY SURGICAL INC.
CODE OF BUSINESS CONDUCT AND ETHICS
Effective November 23, 2020

Symmetry Surgical Inc. is a leading global supplier of surgical instruments and electrosurgery products. Our mission is “Elevating Surgery For Life.” People around the world depend on us every day to deliver excellence both in what we do as well as in how we do it. It is truly our privilege to serve an industry that makes a difference in people’s lives.

The Symmetry Surgical name carries with it strong brand equity in hospitals around the world. Over 4,000 customers and their patients know they can trust us to provide them with the highest quality products while we carefully adhere to the laws and regulations that govern our industry and business. Our reputation is predicated on the strong commitment to compliance we have fostered. In such an environment, our employees are proud to work, our suppliers and customers know they will be treated fairly, and our shareholders know they may invest with confidence. To maintain our commitment to compliance and to protect and build our reputation, we have developed this Code of Business Conduct & Ethics (the “Code”).

This Code provides you with information and resources you need to help you make good business decisions and act with integrity. It covers a number of areas, including legal compliance; protecting the Company’s assets; treating our customers, suppliers and shareholders with trust and respect; and creating a productive work environment free from harassment and discrimination. While our goal is always complete compliance with the Code, it also provides multiple avenues for reporting and redress to ensure that violations of the Code are addressed promptly and appropriately should they occur.

The Code applies to all of us, regardless of position, including temporary employees, interns and independent contractors, as well as our officers and Board of Directors. We also require that those who act as our agents in business adhere to the Code. You are responsible for understanding and complying with the Code, and we are relying on you to raise compliance and ethics concerns through the channels contained in the Code. No Symmetry Surgical employee will ever be disciplined or suffer retaliation for having made a report of a violation of the Code.

We are all privileged to work for Symmetry Surgical, and we are all responsible for preserving and strengthening the core ethical beliefs and values upon which it rests. Please help us all to fulfill this important responsibility.

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I. Introduction

This Code of Business Conduct and Ethics (the “Code”) for Symmetry Surgical Inc. (or the “Company”) establishes standards of honesty and integrity that all Symmetry Surgical employees and officers must follow. This Code does not address every situation that may arise and is not a substitute for our responsibility to exercise good judgment. The standards in this Code may be further explained or implemented through policy memoranda, including those relating specifically to our business. Each supervisor and manager is responsible for ensuring that employees under his or her supervision understand and comply with this Code. This Code should also be provided to and followed by Symmetry’s agents and representatives, including consultants.

If an applicable law conflicts with a policy in this Code, you must comply with the law. However, if a local or foreign custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask an Executive Officer how to handle the situation. The Company’s Executive Officers include the Chief Executive Officer, Chief Financial Officer, General Counsel, and any Senior Vice President(s).

If you become aware of any provision of this Code that may be inconsistent with, or which violates any local, state, federal or foreign law, rule or regulation, you are required to report such compliance issue via any of the means set forth in Section XV. Those who violate the standards of this Code, including, without limitation, failure to report a compliance issue, will be subject to appropriate disciplinary action, which may include termination of employment or service or termination of a consulting or distribution contract.

Any waiver of the policies or procedures set forth in this Code in the case of an Executive Officer may be granted only by Symmetry Surgical’s Board of Directors.

II. Compliance with Laws, Regulations and Rules

Obeying the law, both in letter and in spirit, is the foundation on which Symmetry Surgical’s ethical standards are built. All Symmetry Surgical employees, officers, temporary agency personnel and contractor personnel (collectively, “Symmetry Surgical Personnel”) must respect and obey all applicable national, state and local laws, rules and regulations. Although not all Symmetry Surgical Personnel are expected to know the details of these laws, rules and regulations, you must take an active role in being knowledgeable enough to determine when to seek advice from supervisors, managers or other appropriate personnel. Any suspected or actual violation of any applicable law, rule or regulation or this Code must be reported immediately via any of the means set forth in Section XV. It is a violation of this Code to assist any person, either within the Company or elsewhere, in any violation of any applicable law, rule or regulation or this Code. The following highlights certain of your responsibilities with respect to particular laws, rules and regulations that may be particularly relevant to you and the conduct of our business, but in no way limits your responsibility to comply with all applicable laws, rules and regulations.

A. Medical Device Laws and Regulations

Symmetry Surgical Personnel should be aware of and obey applicable laws and regulations that apply to the manufacture, sale and distribution of medical devices, including, but not limited to, those under the jurisdiction of the United States Food and Drug Administration and any other similar national laws and regulations relating to Symmetry Surgical’s business worldwide. Strict attention, for example, must be given to quality control and adherence to good manufacturing practices and quality system regulations. Employees must address with the General Counsel any questions involving these or other areas of the law relating to medical devices.

B. Copyright Laws and Computer Software

Symmetry Surgical Personnel must comply with laws governing the reproduction of copyrighted materials. These laws dictate under what circumstances a reproduction of a copyrighted work may be legally made. Generally, a single copy of a copyrighted article may be made for one's own use. The reproduction of whole works, or substantial portions of works, such as newsletter issues, is not allowed without the author's permission. The law does not require one to include a copyright notice on his or her work for it to be protected by copyright laws. Symmetry Surgical may duplicate copyrighted software only according to specific licensing agreements and you must use any licensed software only in accordance with the Company's agreement with its manufacturer. If you learn of any misuse or unauthorized reproduction of copyrighted material, you must immediately notify an Executive Officer.

C. Anti-Corruption Acts

The laws of most countries make the payment or offer of payment or even receipt of a bribe, kickback or other corrupt payment a crime, subjecting both Symmetry Surgical and individual employees to criminal and civil penalties, including fines and prison sentences. These anti-corruption laws include, but are not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA"). The FCPA's anti-bribery provisions make it illegal to bribe foreign officials in order to obtain or retain business or to secure any improper advantage.

Specifically, the FCPA prohibits payments, offers or gifts of money or anything of value, with corrupt intent, to a "foreign official." A "foreign official" includes:

- Any officer or employee of a foreign government (i.e., other than the United States) or any department, agency, or instrumentality thereof (which includes a government-owned or government-controlled state enterprise, such as a state-owned hospital system), including health care professionals at state-owned hospitals;
- Any person acting in an official capacity for or on behalf of a foreign government or government entity or of a public international organization;
- Any foreign political party or party official, or any candidate for foreign political office.

Thus, foreign officials include not only elected officials, but also consultants who hold government positions, employees of companies owned by foreign governments, political party officials and others.

The FCPA prohibits both direct and indirect payments to foreign officials. Thus, Symmetry Surgical can face FCPA liability based on improper payments made by its agents or other business partners. Accordingly, neither the Company nor any of its employees, agents, distributors or business partners shall make, promise or authorize any gift, payment or offer anything of value on behalf of the Company to a foreign official or to any third person who, in turn, is likely to make a gift, payment or offer anything of value to a foreign official.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules violates Symmetry Surgical policy and could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. If you have any questions regarding a relationship with a government official bring your concerns to the attention of the CEO, CFO or General Counsel. If one or more of the foregoing are involved in the issue regarding which you are concerned, please use other reporting means as set forth in Section XV.



III. Government Investigations

Symmetry Surgical's policy is to cooperate fully with all governmental investigations. Prior to or during any government inspection or investigation, you must never destroy or alter any Symmetry Surgical documents, lie or make misleading statements to a government investigator, attempt to obstruct, mislead or delay the communication of information or records to any governmental authority or attempt to cause another employee to do any of the foregoing. If you receive any inquiry from a government investigator, Symmetry Surgical requires that you immediately notify an Executive Officer so that the Company may cooperate fully and ensure a timely and complete response to any requests by that authority. Unless required by Court order or other valid governmental requirement, you may not provide confidential Symmetry Surgical documents to any government entity in response to such a request without the prior approval of an Executive Officer. You may have the right to be represented by legal counsel during any investigation or inquiry by any governmental agency.

IV. Conflicts of Interest

Conflicts of interest are strictly prohibited under this Code, unless approved by the Chief Executive Officer/Executive Leadership Team. A conflict of interest exists when a person's personal or private interests interfere, or even appear to interfere, in any way with Symmetry Surgical's interests. The existence of a conflict depends upon the circumstances, including the nature and relative importance of the interest involved. A conflict situation can arise when Symmetry Surgical personnel take actions or have interests that may make it difficult for, or raise questions as to whether, such Symmetry Surgical personnel can perform his or her work for Symmetry Surgical objectively and effectively. Conflicts of interests may also arise when an employee or officer, or members of his or her family, receive any personal benefits as a result of his or her position with Symmetry Surgical. You may not obtain any financial benefit as a result of your position with Symmetry Surgical apart from what is provided to you under Symmetry Surgical's compensation and benefit programs.

It is a conflict of interest for a Symmetry Surgical employee to work simultaneously for a competitor, customer or supplier unless preapproved by the Company's Chief Executive Officer. You are also not allowed to work for a competitor as a consultant or Board member. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except when acting on Symmetry Surgical's behalf. Conflicts of interest may not always be clear, so if you have a question, you should consult with the Chief Financial Officer or General Counsel.

V. Corporate Opportunities

Symmetry Surgical Personnel are prohibited from taking for their personal use opportunities (e.g., potential business ventures) that are discovered through the fulfillment of their Symmetry Surgical responsibilities or through the use of Symmetry Surgical property or information without the Chief Executive Officer's consent/Executive Leadership Team. Symmetry Surgical Personnel may not use Symmetry Surgical property, information, or position for improper personal gain and must never compete with Symmetry Surgical directly or indirectly. Employees and officers owe a duty to Symmetry Surgical to advance its legitimate interests when the opportunity to do so arises.

With prior approval, Symmetry Surgical employees acting in their capacity as an agent of Symmetry Surgical, may give lectures, conduct seminars, publish articles in books or engage in any other similar activity for which he or she may be paid a fee or honorarium. Symmetry Surgical encourages this involvement in the community by its employees. However, any fees, honorariums or reimbursements must be transferred to Symmetry Surgical unless written approval is given to retain them.

VI. Confidentiality

Symmetry Surgical Personnel are prohibited from using any proprietary or confidential information of Symmetry Surgical or its customers for their personal benefit. You may also not disclose or permit the disclosure of proprietary or confidential information of Symmetry Surgical or its customers to non-Symmetry Surgical personnel, except when authorized by the General Counsel, or when such disclosure is legally mandated or allowed by applicable laws or regulations. You must use appropriate judgment when disclosing any proprietary or confidential information to other Symmetry Surgical Personnel and such disclosure should be made only on a “need to know” basis. Confidential information includes all non-public information that might be of use to competitors in their efforts to compete with the Company’s business, or harmful to Symmetry Surgical or its customers such as pricing, financial and similar information, intellectual property, trade secrets or similar business information. It also includes information that suppliers and customers have entrusted to us. Your obligation to preserve confidential information continues even after your employment with Symmetry Surgical ends.

VII. Fair Dealing

Symmetry Surgical seeks to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Improperly obtaining proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies is prohibited. You should endeavor to respect the rights of, and deal fairly with, Symmetry Surgical’s customers, suppliers, competitors and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Symmetry Surgical’s products must be sold on the basis of price, quality and service. To comply with the law and maintain our valuable reputation, our advertisements and other communications must be truthful and fairly describe our products and services. Symmetry Surgical personnel should not disparage competitors’ products, their services or employees. Comparisons of Symmetry Surgical’s products to a competitor’s products should be fair and substantiated.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain an unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Symmetry Surgical Personnel or a family member¹ of any Symmetry Surgical Personnel unless it (i) is not a cash gift, (ii) is consistent with customary business practices, (iii) is not excessive in value, (iv) cannot be construed as a bribe or payoff and (v) does not violate any laws or regulations. You must discuss with an Executive Officer any gifts or proposed gifts which you believe may be inappropriate. Symmetry Surgical maintains a policy regarding interactions with healthcare professionals which is posted on its web site and provides, in part, that no Symmetry Surgical Personnel may offer or give anything of value to any health care professional (doctors, surgeons, buyers for hospitals, or related individuals) with an explicit or implicit requirement to use or purchase Symmetry Surgical products or as a reward for prior use or purchase of Symmetry Surgical products. If you have questions regarding this policy, please consult the Chief Financial Officer or General Counsel. Failing to report a violation of which you are aware could lead to disciplinary action up to and including termination of employment or any contract with the Company.

¹ As used in this Code, “Family Members” include a person’s spouse, parents, siblings, stepparents, children, stepchildren, brothers and sisters, mothers- and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law, whether by blood, marriage or adoption and any person (other than the tenant or employee) sharing the household.



VIII. Discrimination, Harassment and Fair Treatment of Employees

Symmetry Surgical is firmly committed to providing equal opportunities for all of its employees in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind.

Discrimination.

Symmetry Surgical offers equal employment opportunity and treatment to all employees and qualified applicants. Qualified applicants and employees will receive consideration for employment and promotion without regard to race, color, religion, national origin, sex, sexual orientation, age (except where each is a bona-fide occupational qualification, as defined by law,) physical or mental disability (except where the disability prevents the individual from being able to perform the essential functions of the job and cannot be reasonably accommodated in full compliance with the law), veteran status, or any other legally protected status. This policy affirms Symmetry Surgical's deep commitment to providing equal employment opportunities for all employees and job applicants in compliance with all federal, state and local laws and regulations.

In view of the above, Symmetry Surgical commits to:

- Employ and advance in employment qualified individuals regardless of race, color, religion, sex, sexual orientation, or any other legally protected status. Such action applies to all employment practices, including, but not limited to: hiring, promoting, layoff or termination, rates of pay or other forms of compensation, selection for training, tuition assistance, social and recreational programs.
- Base decisions of employment on criteria that ensures employees of both sexes shall have an equal opportunity to any available job that he or she is qualified to perform unless sex is a bona fide occupational qualification.
- Ensure all employment decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities.

Harassment.

Symmetry Surgical is committed to maintaining a work environment where employees at all levels are able to devote their full attention and best efforts to their work without the fear or distraction resulting from harassment of any kind. Harassment, either intentional or unintentional, has no place in the workplace and is not allowed under Symmetry Surgical's policies. It is against the law and Symmetry Surgical's policies for any employee, whether a manager or co-worker, to sexually harass another employee. Sexual harassment or sex-based harassment occurs when:

- Unwelcome physical conduct of a sexual nature becomes a condition of an employee's continued employment;
- Conduct of a sexual nature affects other employment decisions regarding the employee;
- Conduct of a sexual nature creates an intimidating, hostile or offensive working environment.

Sexual and sex-based harassment may include, but is not limited to:

- Requests for sexual favors;
- Unwanted physical contact, including touching, pinching or brushing the body;
- Verbal or non-verbal harassment (sexual innuendoes, suggestive objects or pictures, suggestive jokes, leering, whistling or obscene gestures); and



- Acts of physical aggression, intimidation, hostility, threats or unequal treatment based on sex (even if not sexual in nature).

Other forms of harassment are prohibited as well, and all employees are prohibited from making statements, displaying or using words, objects, or pictures that others could interpret as being insulting, derogatory or as slurs based on race, color, national origin, religion, sex, age, orientation, disability or any other legally protected status. Such conduct may make a reasonable person uncomfortable in the workplace or could interfere with an employee's ability to perform a job. Comments or actions of this type, even if intended as a joke among friends, are inappropriate in the workplace and will not be tolerated. All of the foregoing is prohibited regardless of whether it occurs in person, via electronic communication, in social media or otherwise is conveyed to any other persons even off work hours.

Reporting Discrimination or Harassment.

Any employee who believes he or she has been harassed or who has witnessed or learned of harassment violating this policy should report the conduct immediately to his or her manager or supervisor. If the employee is uncomfortable for any reason reporting the matter to his/her manager or supervisor, or if the manager or supervisor is involved in the behavior, then the employee should report it to the VP of Human Resources via dennis.tapp@symmetrysurgical.com or (615) 964-5396, directly to the General Counsel at (317) 446-5267, or via email at david.milne@symmetrysurgical.com or through the anonymous hotline at (844) 286-0913 or via email at ethicsreporting@symmetrysurgical.com.

Any employee who knows of an incident of sexual harassment or any other type of harassment is required to report the incident via the various means described above. The company cannot resolve matters that are not brought to its attention.

Symmetry will conduct a thorough, timely and impartial investigation of all complaints of harassment. Reports of harassment will be treated as confidentially as possible, and no action will be taken against any employee because he or she has reported an incident of harassment in good faith. Any employee who has been found to have harassed another employee will be subject to disciplinary action up to and including discharge.

IX. Nepotism and Relationships in the Workplace

Symmetry may consider members of the same family for employment in positions for which they are qualified. To avoid situations that may constitute a conflict of interest, normally a person may not be hired, assigned, or retained in a position where their work is supervised by a close relative, member of their immediate family², or member of the same household. There may be circumstances where this would occur, but they must first be approved by the VP of Human Resources and the CEO.

Dating relationships between Team Members are strongly discouraged because of the potential for perceptions of favoritism, ramifications from breakups, and such a relationship's impact on the impartial conduct of Symmetry's business. Symmetry will not hire someone who is in a romantic relationship with any current Team member who supervises any other Team members. If two current Team members begin such a relationship and one or both supervise other Team members, then the more senior of the two will

² For the purposes of this policy, a "family" member includes a person's spouse, parents, siblings, stepparents, children, stepchildren, brothers and sisters, mothers- and fathers-in-law, sons- and daughters-in-law, brothers- and sisters-in-law, whether by blood, marriage or adoption and any person (other than the tenant or employee) sharing the household.



tender their resignation (or both will submit their resignations if they are of the same level). Symmetry's CEO will determine whether to accept the resignation(s) based on all applicable circumstances, including reporting relationship and potential for business disruption the relationship could create.

X. Health and Safety

Symmetry Surgical strives to provide each employee with a safe and healthy work environment. Each employee is responsible for maintaining such a workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are not permitted in Symmetry Surgical's workplace. Employees should report to work in condition to perform their duties, free from the influence of controlled, illegal or impairing substances. The distribution, use, possession or being under the influence of alcoholic beverages on Symmetry Surgical property, including office parties and other celebrations, is strictly prohibited. The use or possession of all other controlled or illegal substances is prohibited at all times on Symmetry Surgical property, unless you have professional medical authorization for such possession or use. Controlled or illegal substances are those that are restricted or prohibited by law with respect to their distribution, use or possession. The Handbook contains additional information regarding these issues and should be consulted in conjunction with this Code.

XI. Record Retention and Content

Symmetry requires honest and accurate recording and reporting of information in order to make responsible business decisions. You must ensure that all records for which you are responsible accurately reflect transactions and do not include any false or misleading information. For example, Symmetry Surgical Personnel must properly document their true and actual number of hours worked and document and record accurately the use of business expense accounts.

All of Symmetry Surgical's books, records, accounts and financial statements must adhere to U.S. Generally Accepted Accounting Procedures (GAAP), be maintained in reasonable detail, appropriately reflect Symmetry Surgical's transactions and conform both to applicable legal requirements and to Symmetry Surgical's internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation and brought to the attention of Symmetry Surgical's Chief Financial Officer.

Business records and communications often become public. You should therefore avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of business results, information, people and companies that could be misunderstood or misconstrued. This policy applies to all forms of written communication, including but not limited to e-mail, internal memos, and formal reports and all other forms of electronic communications. Symmetry Surgical's records should always be retained or destroyed according to Symmetry Surgical's record retention policies. In accordance with those policies, you should consult with the Company's General Counsel prior to destroying any paper or electronic document that is related in any way to a pending or anticipated investigation, lawsuit or related inquiry.

XII. Protection and Proper Use of Symmetry Surgical Assets

All Symmetry Surgical property should be used for Symmetry Surgical's benefit in the conduct of its business. Symmetry Surgical personnel should endeavor to protect Symmetry Surgical's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on Symmetry Surgical's profitability. Any suspected incident of fraud or theft of Symmetry Surgical's property should be immediately reported to an Executive Officer for investigation. Symmetry Surgical's assets should not be used for non-Symmetry Surgical business.



The obligation of Symmetry Surgical Personnel to protect Symmetry Surgical's assets includes its proprietary information. Proprietary information includes intellectual property including but not limited to trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate this policy, may be illegal and could result in civil or criminal penalties.

XIII. Disclosure and Public Communications; Communications With Third Parties

- A. Public Disclosure and Communications. It is Symmetry Surgical's policy to provide periodic public news and other releases to the extent consistent with the Company's business goals and needs. Symmetry takes this policy seriously and has created a "Disclosure Policy" that governs the manner in which Symmetry Personnel may disclose information regarding the Company. As a general proposition, only the CEO or CFO may make such disclosures so you should never make such a communication without first obtaining clearance in writing from the CEO, CFO and/or General Counsel so that the Company can ensure a truthful and accurate communication that aligns with its goals. Requests from other third parties for information about Symmetry Surgical's financial or business information should always be directed to the CEO or CFO.
- B. Internal Disclosures. The CEO and each officer must promptly bring to the attention of the Board of Directors information he or she may have concerning: (a) significant deficiencies in the design or operation of internal control over financial reporting which could adversely affect the Company's ability to record, process, summarize financial data; or (b) any fraud, whether or not material, that involves management or other employees who have a role in the Company's financial or accounting work.
- C. Communications With Third Parties. Symmetry Surgical strives to ensure that all of its products provide patients and caregivers with the highest possible quality and safety, and employees should not be placed in a position where they are offering opinions on the safety or efficacy of these products. Accordingly, employees should adhere to the following rules when communicating with third parties, customers, news organizations, insurers, patients and any other individual or entity regarding Symmetry Surgical's products:
- Always focus on facts, ensuring that your statements are completely true and accurate. If you are not positive about the facts, do not make a statement;
 - Never offer an opinion or subjective view of a product, procedure, claim or other issue;
 - Never admit or state that Symmetry Surgical's product caused an injury or malfunctioned. While initial views might lead one to believe that is the case, determining whether a product malfunctioned or was not used correctly can be a difficult determination that must be left for experts.
 - Never promise or agree to make any payments to a third party. Symmetry Surgical stands behind its products and obligations, although whether such obligations exist must be left to experts.
 - **If you are asked a question with which you are not completely comfortable, or if you simply do not wish to answer a question or address an issue that has been raised by a third party, you should refer the inquiry and the third party to the Company's Chief Marketing Officer or General Counsel to handle.**

XIV. Compliance

All employees, agents, consultants or other representatives are expected to be familiar with and to observe the Code and violations may be grounds for discipline up to and including immediate termination of



employment or termination of service-related contracts. In addition, all supervisors are responsible for ensuring that employees under their supervision are aware of the Code and of the Company's commitment to conducting business ethically and legally. No supervisor or manager may require or imply that an employee should act illegally or in contradiction to the Code. Each supervisor and manager is responsible for ensuring employee understanding and compliance with the Code and such management will be required each year to confirm that they are not aware of unreported violations of the Code and to ensure that appropriate training on Code responsibilities has been properly communicated to each employee under their direction.

XIV. Social Media Participation

We encourage communication among our employees, customers, partners, and others. Blogs, social networks, discussion forums, wikis, video, and other social media can be a great way to stimulate conversation and discussion. That said, we have a responsibility to use Social Media in a responsible manner that does not violate any laws or regulations or unfairly or inaccurately damage the Company's business prospects. Nothing in this policy is intended to impair any legally protected rights as created or enforced under, among other things, the National Labor Relations Act.

This Social Media Participation Policy applies to:

- All blogs, wikis, forums, and social networks hosted or sponsored by Symmetry Surgical;
- Your personal blogs that contain postings about Symmetry Surgical's business, products, employees, customers, partners, or competitors;
- Your postings about Symmetry Surgical's business, products, employees, customers, partners, or competitors on external blogs, wikis, discussion forums, or social networking sites such as Twitter;

While your social media activities take place completely outside of work, as your personal activities should, what you say can have an influence on your ability to conduct your job responsibilities, your teammates' abilities to do their jobs, and Symmetry Surgical's legitimate and legally-protected business interests. They may also violate certain laws or regulations, as well as terms in this Code, which apply equally to your online conduct. Below are additional requirements that pertain to your use of Social Media:

Protect Confidential Information

The confidential information policies in this Code apply equally to use of social media, so do not disclose any of Symmetry Surgical's confidential information on any social media. This includes, but is not limited to, financial information such as revenue, earnings, and other financial forecasts, and anything related to Symmetry Surgical's strategy, products, management, customers, and potential acquisitions, that has not been made public. Protecting the confidential information of our employees, customers, partners, and suppliers is also important. Accordingly, you should not mention them, including Symmetry Surgical executives, in social media without their permission. In addition, you may not publish (nor should you possess) our competitors' proprietary or confidential information. You may make observations about competitors' products and activities if your observations are accurate and based on publicly available information. Take care not to disparage or denigrate competitors. Nothing in this policy is intended to impair any legally protected rights as created or enforced under, among other things, the National Labor Relations Act.

Prohibition on Comments Regarding M&A Activity

You must not comment publicly on Symmetry Surgical's M&A activity, including potential and pending acquisitions. This applies to potential acquisitions regardless of their status - in diligence, announced but



not closed, etc. Any commentary on what a transaction or potential transaction may mean to Symmetry Surgical, positive, negative or neutral can be problematic and must be avoided.

Refrain from Objectionable or Inflammatory Posts

You should not post anything that is false, misleading, obscene, defamatory, profane, discriminatory, libelous, or physically threatening regarding the Company, its customers or others with whom it does business. Third party Web sites and blogs that you link to must meet our standards of propriety, as set forth in the Code. Please remember that if you make any false or defamatory statements or publish an individual's private details you could create legal liability for Symmetry Surgical and you. Nothing in this policy is intended to impair any legally protected rights as created or enforced under, among other things, the National Labor Relations Act.

Prohibition on Speaking for Symmetry Surgical or Anonymous Posts

Remember that you are not an official spokesperson for Symmetry Surgical. Make it clear that your opinions are your own, and do not necessarily reflect Symmetry Surgical's views or positions. You should also identify yourself as an employee if failing to do so could be misleading to readers or viewers and do not engage in covert advocacy for Symmetry Surgical.

Misuse of Symmetry Surgical Resources

Personal social media activities must not interfere with your work or productivity at Symmetry Surgical. Don't use company resources to establish your own blogging environment. Symmetry Surgical resources, including servers, may be used solely in connection with company work and business.

XV. Reporting Complaints or Concerns Regarding the Code or Accounting, Internal Accounting Controls or Audit Matters

Any employee who has complaints or concerns about violations of the Code or the Company's accounting, internal accounting controls or auditing matters, or who becomes aware of questionable accounting or audit matters, must report such matters to the Executive Leadership Team in any of the following ways:

- Send a written report (signed or anonymous) to the attention of the Executive Leadership Team, Symmetry Surgical Inc., 3034 Owen Drive, Antioch, TN 37013;
- Email the Executive Leadership Team at ethicsreporting@symmetrysurgical.com;
- Report the matter by calling toll-free at (844) 286-0913 and leaving information about the matter in a confidential voice mailbox.
- Send a written report (signed or anonymous) to the attention of the Company's Board of Directors at 272 E. Deerpath Rd. Suite 350, Lake Forest, IL 60045.

Reports may also be submitted to the following individuals:

- The Chief Executive Officer;
- The Chief Financial Officer;
- The Chief Accounting Officer;
- The General Counsel;
- Any of the Company's Senior Vice Presidents.



Any complaints or issues raised to members of the Company's management shall be promptly communicated to the Executive Leadership Team or, if a member of the Executive Leadership Team is involved in the issue, to any of the uninvolved individuals noted above or the Company's Board of Directors.

XVI. Investigation and Response

The Company is committed to ensuring prompt investigations and remedial actions in the event of violations of the Code and will consider and appropriately investigate all concerns raised regarding it. In order to facilitate a complete investigation of any potential violation, employees who raise any concerns regarding violations of the Code should be prepared to provide as many details as possible, including a description of the questionable practice or behavior, the names of any persons involved, the names of possible witnesses, dates, times, places, and any other available details. The Company encourages all employees with complaints or concerns to raise concerns and come forward with information. The confidentiality of all reports of Code violations will be maintained to the extent consistent with law.

The Executive Leadership Team will oversee the receipt and handling of allegations of Code violations, including directing an appropriate investigation and response. The Executive Leadership Team may, at its discretion, utilize internal or external resources to conduct any or all portions of the investigation. Regardless of which group conducts an investigation, all Symmetry Surgical Personnel are expected to cooperate with investigations of Code violations. Based on the conclusions drawn after its investigation, the Executive Leadership Team will direct the Company to take prompt and appropriate action in response to the complaint or concern if necessary to ensure compliance with the Code and any other applicable legal and ethical requirements. If the Executive Leadership Team determines that a particular complaint or concern is not covered by this policy, but presents a potential concern for the Company, it will refer the complaint or concern to the Company's outside legal Counsel for appropriate handling and response.

XVII. Whistleblowers and Non-retaliation

Employees are sometimes concerned that they will be the victim of retaliation or reprisals if they "blow the whistle" by reporting violations of the law or the Company's policies, including the Code. The Company will not tolerate any form of reprisal against any person who, in good faith, makes a report pursuant to the Code or who participates in an investigation regarding a violation of the Code, applicable securities laws, rules or regulations, or any other laws or regulations. Any such retaliation or reprisal by a Company employee is forbidden and will subject the perpetrator to discipline up to and including termination. Any employee who becomes aware of retaliation against an employee or witness resulting from a complaint or investigation should report such behavior in the same manner as described in Section XV.

XVIII. Reporting Complaints or Concerns Regarding Violations of Federal, State, Local or International Laws and Regulations Relating to the Company's Manufacturing Processes

Any employee who has complaints or concerns about the Company's manufacturing processes as addressed under federal, state, local or international laws and regulations is strongly encouraged to report such matters to the General Counsel or via any of the means described in Section XV hereof.