

California Transparency in Supply Chains Act Disclosure

(Cal. Civ. Code § 1714.43)

RTI Surgical, Inc. and its subsidiaries (“RTI”) strive to achieve and maintain a high standard of corporate integrity. RTI respects and supports U.S. and international principles aimed at protecting and promoting human rights and is committed to conducting business in an ethical, legal, and socially responsible manner. RTI expects that its direct suppliers share in its commitment to responsible supply chain management.

Internal Accountability Code

RTI maintains internal accountability procedures for employees and direct suppliers who fail to meet RTI’s Code of Conduct and policies relating to slavery and human trafficking (the “RTI Code”). The RTI Code of Conduct is set out in RTI’s Supply Chain Policy Relating to Slavery and Human Trafficking, which are documented and available to RTI employees and direct suppliers.

RTI employees are responsible for complying with the RTI Code as part of their employment. Failure to act in accordance with the RTI Code may result in disciplinary action, including termination of employment. Additionally, RTI expects that its direct suppliers will comply with the RTI Code when working on RTI’s behalf. If a direct supplier is found to be in violation of the RTI Code, then RTI may review and evaluate its relationship with the direct supplier. Upon review, direct suppliers are expected to take corrective action to address any deficiencies identified with respect to compliance with the RTI Code. If the deficiencies are not resolved within a timely manner, RTI may terminate its relationship with the direct supplier.

RTI’s Compliance and Ethics Hotline is available both in the U.S. and internationally to the employees of RTI and its direct suppliers. The Compliance and Ethics Hotline may be used to report any illegal, unethical, or questionable behavior relating to the RTI Code. Such reports will be investigated under the guidance and direction of RTI’s legal and compliance departments, as appropriate. RTI prohibits retaliation against any individual who raises a concern, question, or complaint in good faith.

Certification

RTI’s terms and conditions of purchase (the “Terms and Conditions”) require its direct suppliers to certify that they will comply with all applicable federal, state/provincial, and local rules, laws, and regulations in performing their obligations to RTI, which include those rules, laws, and regulations relating to slavery and human trafficking.

Additionally, RTI has incorporated its Supply Chain Policy into the Terms and Conditions. The Supply Chain Policy specifically requires that direct suppliers comply with all applicable laws relating to slavery and human trafficking and forbids a direct supplier from manufacturing its products using materials that violate the laws regarding slavery and human trafficking in the country or countries in which the direct supplier is doing business.

Education and Training

As of February 2016, RTI provides training to RTI employees who have direct responsibility for supply chain management. Such training provides guidance on laws and regulations relating to slavery and human trafficking, summarizes the RTI Code, and suggests factors to consider to mitigate risks in RTI's direct supply chains.

Audits

The Terms and Conditions reserve the right for RTI to perform onsite inspections of direct supplier facilities, as deemed necessary by RTI in order to assess compliance with applicable federal, state/provincial, and local laws, rules, and regulations. However, RTI does not currently conduct a direct supplier audit program.

Verification

In addition to the procedures and practices described above, RTI has engaged a vendor to conduct a verification process with respect to slavery and human trafficking for some of its first tier suppliers.