



GLOBAL ANTI-CORRUPTION POLICY

VERSION 2

AMENDED AS OF: FEBRUARY 25, 2010

APPROVED BY:

A handwritten signature in black ink, appearing to read "Bradley J. Tandy", written over a horizontal line.

Bradley J. Tandy
Senior Vice President, General Counsel & Secretary
Biomet, Inc.

A handwritten signature in black ink, appearing to read "Sujata T. Dayal", written over a horizontal line.

Sujata Dayal
Corporate Vice President & Chief Compliance Officer
Biomet, Inc.

BIOMET'S COMMITMENT TO GLOBAL COMPLIANCE

Biomet, Inc. and its worldwide subsidiaries (collectively, "Biomet") are committed to complying with the anti-corruption laws in all countries in which Biomet operates. This includes, but is not limited to, laws in the United States such as the Medicare and Medicaid Patient Protection Act of 1987 (the "Anti-Kickback Statute"), Stark Laws, Federal False Claims Law, the United States Foreign Corrupt Practices Act (the "FCPA"), and international laws such as anti-corruption laws enacted in each country where Biomet conducts business, including the Canadian Corruption of Foreign Officials Act and the United Kingdom Bribery Bill 2009 and anti-bribery legislation enacted by each signing country in accordance with the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (the "OECD Convention").

In addition to all our previous compliance efforts, Biomet has adopted this enhanced Global Anti-Corruption Policy with additional focus on interactions with health care professionals ("HCPs") in our markets. Through this enhanced Anti-Corruption Policy, Biomet will actively and closely monitor the adherence of all of its employees, distributors, sales representatives, suppliers and consultants worldwide to the FCPA, as well as other anti-corruption laws including the Anti-Kickback Statute. While the FCPA is a United States statute, it does apply to Biomet's business activities outside the United States. Biomet will also continue to address ethical and legal obligations in countries outside the United States which are subject to anti-corruption laws such as the OECD Convention.

As new procedures are being implemented to help provide guidance for Biomet activities, it is important that you keep in close contact with the Biomet Compliance and Legal Departments and seek guidance and review before providing anything of value to a health care provider that is not within Biomet's policies and procedures. As Biomet continues its effort to institute its best practices to achieve the highest possible standards in its ongoing compliance programs, the support not only of every employee, but also of every distributor, sales representative, supplier, and consultant is critical to achieving our goal. As Jeffrey R. Binder, Biomet's President and CEO stated, "our Board of Directors and senior management team are committed to setting the highest possible company-wide standards for ethical business conduct." With the support of all employees, Biomet will continue its corporate success while achieving the highest standard of ethical and legal conduct worldwide.

This Policy is applicable to all Biomet employees and agents, including all directors, officers, board members and any other individual or entity acting for or on behalf of Biomet, anywhere in the world. All third parties, including distributors, sales representatives, agents, intermediaries, consultants, and joint-venture partners must be informed about this Policy and must agree to comply with this Policy and all applicable anti-corruption laws as a pre-requisite to act on behalf of or jointly with Biomet. **Biomet prohibits all improper payments of any nature including payments to third parties, Government Officials, Health Care Professionals and/or customers anywhere in the world.**

GLOBAL ANTI-CORRUPTION POLICY

- A. All Biomet employees, as well as any party working on Biomet's behalf, must not make, offer to make, or promise to make payments (regardless of whether the payment is actually made) or give anything of value *directly or indirectly* to any third party, including any Government Official and/or HCP, to assist Biomet in obtaining or retaining an improper business advantage, whether or not any benefit is received. Prohibited payments include:
- Payments securing an improper advantage, including a decision to select Biomet to provide any products or services, or to provide Biomet with more preferential terms, including, but not limited to, providing any confidential, proprietary or competitor information that may provide Biomet an improper advantage;
 - Any fees, commissions, profit sharing agreements or other improper payments to HCPs to encourage the use of Biomet products;
 - Improper gifts, hospitality or other non-monetary items provided to an HCP that do not comply with the Global Compliance Operating Procedures;
 - Payments to influence any act or decision of a Government Official in his or her official capacity;
 - Payments to influence the Government Official to abuse his or her power for private gain;

- Payments to induce a Government Official to perform or fail to perform any act;
 - Payments inducing a Government Official to use his or her influence with a government or government instrumentality to affect or influence any act or decision of a government or instrumentality;
 - Any facilitation payments made without the approval of the Legal or Compliance Department;
 - Any gifts or entertainment provided to any regulatory, customs, or otherwise similarly situated Government Official;
 - Any travel expenses of any regulatory, customs, or otherwise similarly situated Government Official; unless expressly preapproved by the Legal Department for legitimate business needs, such as regulatory inspections of Biomet's facilities; and
 - Any political contribution by Biomet.
- B. As a United States issuer of securities, Biomet must make and keep books, records, and accounts that in reasonable detail, accurately and fairly reflect Biomet's transactions and assets, and it must maintain an adequate system of internal accounting controls. No accounts may be kept "off-book" in order to facilitate or conceal improper payments. All expenditures, gifts, educational items, hospitality, charitable donations, educational grants and any other payments must be accurately and reliably reported and recorded. All accounting records, expense reports, invoices, vouchers, and other business records must be accurately and fully completed, properly retained, and reliably reported and recorded. Undisclosed or unrecorded funds, accounts, assets or payments must not be established or retained for any purpose. Circumventing or evading or attempting to circumvent or evade Biomet's internal accounting controls is prohibited.
- C. If local laws, codes of conduct, or other regulations in a particular country or region are more restrictive on this subject, or require government approval of the transaction, then any Biomet Affiliate or representative, including any distributors, sales representatives, agents, intermediaries, or consultants, operating in that country or region must fully comply with the more restrictive requirements.

EXAMPLES OF COMPLIANCE ISSUES

The following is a non-exhaustive list of sample situations that raise concerns under various anti-bribery and anti-corruption laws. It is your responsibility to be aware of such situations, and you should report them promptly to the Compliance Department for review:

1. Any person or firm who represents, is being considered to represent, distribute, or supply for Biomet (or its customers/clients through Biomet) who:
 - engages in, or has been accused of engaging in, improper business practices;
 - has a familial or other relationship that could improperly influence the decision of a customer or Government Official;
 - approaches Biomet employees at or near the time of a contract or procurement decision, including tenders, and explains that he or she has a special arrangement with a Government Official, client, or potential client;
 - insists upon receiving a commission payment before the announcement of a contract or procurement decision;
 - demands an extraordinarily high commission or fee for services;
 - requests cash payment or payment "off-books";
 - emphasizes his/her/its "connections";
 - requests additional commission or fees in order to "facilitate" services;
 - demands lavish entertainment, gifts or travel before commencing contract negotiations or other services;
 - requests a consultancy agreement separate from or tied to a distributorship agreement;

- requests a donation from a customer or a party in a position to influence any potential business advantage obtained or retained by Biomet;
 - requests a payment to "overlook" potential violations of law; or
 - requests for employment of a friend or relative.
2. Lack of transparency, supporting documentation or inconsistent documentation for vendors expenses, particularly law firms, consultants and travel agents.
 3. Comments suggesting that a particular manner of conducting business is "the way business is done here."
 4. Large amount of petty cash transactions.
 5. Use of side letters.
 6. Use of consultant which does not appear to possess capability to perform stated services.
 7. Use of consultant whose office location does not make sense in light of service offerings.
 8. Recommendation by a customer, Government Official, or HCP to use a particular consultant or distributor.
 9. Any request that a commission or other payment be made in a third country or to another name or company different from the one earning the commission.
 10. Any commission, payment, or distributor sale price/discount, that appears large in relation to the services provided.
 11. Any request to use a specific sales representative, agent, intermediary, consultant, distributor, or supplier that is not typically used by or known to Biomet.

This is not an exhaustive list of compliance issues. Whenever you are in doubt, you should first consult with the Compliance Department pursuant to the reporting guidelines below.

REPORTING RESPONSIBILITY

If you are aware of any conduct that you believe may violate this Policy, you have a responsibility to report it. You may report such conduct through your normal reporting relationships to your supervisor or Biomet's Compliance or Legal Departments. In addition, Biomet has set up a toll-free helpline and website as described below to allow Biomet employees to report any violation of this Policy. If local law so provides, Biomet employees may choose to remain anonymous when reporting a potential violation on the helpline. Please go to the following website www.ethicspoints.com; select "File a New Report" and enter in the organization name "Biomet". You may submit a report through the telephone or website. If you decide to submit a report through the telephone, please follow the instructions provided by the website.

All such reports will be treated as confidential and be used only for the purpose of addressing the specific problem reported. Such reports will be shared by Biomet management and other authorized individuals only on a need-to-know basis. Unless acting in bad faith, Biomet employees will not be subject to reprisals for reporting information about potential violations.

AUDITING AND MONITORING

Biomet will periodically audit and monitor compliance with this Policy through scheduled, as well as random, anti-corruption compliance assessments and other monitoring initiatives employed by the Compliance Department or other third parties engaged by Biomet. All Biomet employees will be required to execute periodic certifications of Policy compliance, as well as attend, and successfully complete, training related to anti-corruption legislation.

PENALTIES AND CONSEQUENCES

Each Biomet employee is responsible and accountable for adhering to this Policy. Violations of this Policy can result in criminal and civil exposure for Biomet and each Biomet employee involved, including imprisonment and other severe penalties. For example, by law, fines imposed on individuals for violations of the FCPA cannot be paid by Biomet

and must be paid by the individual committing the violation. Many countries also have local laws which impose various fines and/or criminal sanctions. In addition to penalties that may be imposed by the laws of the countries where we operate, violations of this Policy may be punished with discipline, up to and including termination, of the Biomet employee and referral for prosecution.

WHERE TO GO FOR MORE INFORMATION

Questions about this Policy should be directed to the Compliance Department. Further, Biomet's additional policies and other compliance information can be found on the internet at http://www.biomet.com/corporate/corp_compliance.cfm, the Biomet intranet, www.teambiomet.com, or in Europe, www.T2biomet.com. For additional information on: (i) the OECD Convention visit www.OECD.org, (ii) the FCPA visit <http://www.usdoj.gov/criminal/fraud/fcpa>, (iii) AdvaMed Code of Ethics on Interactions with Health Care Professions visit www.advamed.org, and (iv) EUCOMED Guidelines on Interactions with Health Care Professionals visit www.eucomed.org.

POLICY DEFINITIONS

1. **Anything of value:** Includes cash, gifts, travel expenses, offers of employment, and business meals. Anything of value may also include event sponsorships, consultant contracts, fellowship support, research grants, and charitable contributions made at the request of, or for the benefit of, a Government Official or HCP, his or her family, or other relations, even if made to a legitimate charity.
2. **Affiliate:** Each company in which Biomet Inc. has a direct or indirect ownership interest.
3. **Facilitation Payment:** A payment made outside of the ordinary course of business to secure performance of an action by a Government Official.
4. **Government Entities:** For the purposes of this Policy, Government Entities refers to government-owned or controlled commercial enterprises, institutions, agencies, departments, instrumentalities and other public entities (regardless if it is whole or partial ownership or control), **including health care facilities, research institutions, universities and hospitals.**
5. **Government Official:** For the purposes of this Policy, the term Government Official should be interpreted broadly. It includes (1) officers and employees of Government Entities, (2) officers and employees of non-governmental international organizations (e.g., World Health Organization, Doctors Without Borders, Red Cross), and (3) any person with the responsibility to allocate or influence expenditures of government funds, including persons serving in unpaid, honorary or advisory positions and private doctors whose patients are insured by government programs. **The term Government Official also includes any HCP working in, on behalf of, or otherwise affiliated with a government health care facility, institution, university or hospital.**
6. **Government Sponsored System:** A healthcare program, system or facility which is in whole or part, owned, administered, funded or controlled by the government or a government instrumentality.
7. **Health Care Professional ("HCP"):** Any individual or entity that is in a position to purchase, lease, recommend, use, arrange for, or influence the purchase or lease of, or prescribe Biomet's medical technology products including, but not limited to, a licensed physician, medical resident or fellow; non-physician health care practitioner; medical student; and/or an institutional educational or health care facility, entity or organization, including an academic medical center, as well as agents and employees for each of the above individuals and entities. An HCP is considered to be affiliated with an entity if the HCP is employed by, has staff privileges at, or otherwise has a position of influence with the entity.
8. **Payments:** Any and all compensation or remuneration, including but not limited to payments and reimbursements for personal or professional services, meals, travel, grants, sponsorships, research grants, clinical studies, professional meetings, product training, medical education, research funding, product development services, in-kind services (e.g., use of aircraft), advertising, promotion, and marketing expenses or support, and royalties or other payments for transfer of documented intellectual property.