

**Declaration of Adoption of Comprehensive Compliance Program
Pursuant to California Health and Safety Code Section 119402**

Wright Medical Technology, Inc. (“Wright”) is located in Arlington, Tennessee and is in the business of designing, manufacturing and selling orthopaedic medical devices. As a medical device manufacturer, Wright has adopted a Comprehensive Compliance Program in accordance with the Compliance Program Guidance for Pharmaceutical manufacturers developed by the United States Department of Health and Human Services Office of Inspector General. This Comprehensive Compliance Program is known as Wright’s Code of Business Conduct. Contained within the Code of Business Conduct is Wright’s Customer Relationship Policy that sets forth policies regarding interactions by Wright with medical or health care professionals.¹ Among other things, Wright’s Customer Relationship Policy establishes explicit limits on gifts, promotional materials or items or activities that Wright or its representatives may give or otherwise provide to an individual medical or health care professional.

Wright’s Code of Business Conduct and related Customer Relationship Policy may be accessed at <http://www.wmt.com/Corporate/CorporateCompliance.asp>. Copies of these documents and this declaration may also be obtained by calling 1-800-238-7117, extension 4349 and leaving a message or by e-mailing ethics@wmt.com.

Wright declares that to the best of its knowledge, Wright is in compliance with the provisions of California Health and Safety Code Section 119402 as of November 1, 2007.

Questions about Wright’s Code of Business Conduct and Customer Relationship Policy or reports of potential violations of these policies should be directed to ethics@wmt.com or 1-800-238-7117, extension 4349.

¹ The policies in the Customer Relationship Policy are derived from the AdvaMed Code of Ethics on Interactions with Healthcare Professionals (“AdvaMed Code”). The AdvaMed Code is a code of ethics established by the medical device industry substantially equivalent to the “Code on Interactions with Health Care Professionals” adopted by the Pharmaceutical Research and Manufacturers of America referenced in the California Health and Safety Code Section 119402.