



**SYMMETRY MEDICAL INC.
CODE OF BUSINESS CONDUCT AND ETHICS
Effective as Revised as of July 26, 2012**

Dear Symmetry Medical Teammate:

I am honored to work beside you for Symmetry Medical Inc. (“Symmetry”), the leading worldwide provider for the Orthopaedic industry and the direct to hospital general surgical instrument market. As a global healthcare company we have the privilege of serving an industry that makes a difference in people’s lives. In one word, what we do every day “matters.”

The Symmetry Medical name carries with it strong brand equity in the Orthopaedic industry and the Symmetry Surgical name is being established in hospitals around the world. Our over 1,850 customers and their patients know they can trust us to provide them with the highest quality surgical instruments, cases, and orthopedic implants, while we scrupulously 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 protect our reputation and grow the culture we have developed the Symmetry Medical, Inc., Code of Business Conduct & Ethics (the “Code”).

The 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. This includes 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. I promise you that no Symmetry 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, and we are all responsible for preserving and strengthening the core ethical beliefs and values upon which it rests. I am relying on you to join me in helping to fulfill this important responsibility.

Sincerely,

Thomas J. Sullivan,
President and Chief Executive Officer,
Symmetry Medical Inc.



I. Introduction

This Code of Business Conduct and Ethics (the “Code”) for Symmetry Medical Inc. (“Symmetry”) establishes standards of honesty and integrity that all Symmetry employees, officers and directors shall 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, Chief Operating Officer – Symmetry Surgical, and all Senior Vice Presidents.

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 or Director may be granted only by Symmetry’s Board of Directors (the “Board”) and shall be promptly disclosed to shareholders as required by law or the rules and regulations of the New York Stock Exchange.

II. Compliance with Laws, Regulations and Rules

Obeying the law, both in letter and in spirit, is the foundation on which Symmetry’s ethical standards are built. All Symmetry employees, officers, directors, temporary agency personnel and contractor personnel (collectively, “Symmetry Personnel”) must respect and obey all applicable national, state and local laws, rules and regulations. Although not all Symmetry 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. Insider Trading



Symmetry Personnel who are in possession of material, non-public information about any publicly traded corporation, including Symmetry, are not permitted to engage in transactions in the securities of such corporation and may not use or share that information for any other purpose except the conduct of Symmetry business. Material, non-public information includes, but is not limited to: significant new product or service developments, sales and earnings reports or projections, the gain or loss of major contracts, agreements or other arrangements with customers or suppliers, plans for stock splits or buy backs and potential acquisitions or mergers. All material non-public information about Symmetry should be considered confidential information and Symmetry Personnel may not trade in Company stock while they are in possession of it. To use material, non-public information for personal financial benefit or to share such information with others who might make an investment decision on the basis of such information is not only unethical but also illegal and could result in civil and criminal penalties. Symmetry takes this obligation very seriously, and has developed a comprehensive “Insider Trading Policy” that contains a complete list of the obligations all Symmetry Personnel have with regard to their transactions in Company stock. You should review and be familiar with that policy and you should consult the Company’s CFO or General Counsel before buying or selling Company stock if you have any doubt whatsoever about your obligations under the Insider Trading Policy.

B. Medical Device Laws and Regulations

Symmetry 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’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 Chief Compliance Officer any questions involving these or other areas of the law relating to medical devices.

C. Copyright Laws and Computer Software

Symmetry 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 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.

D. Anti Corruption Acts

The U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act of 2010 prohibit giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to influence,



obtain or retain business. The FCPA and the UK Bribery Act both strictly prohibit payments to government officials of any country. In addition, the UK Bribery Act applies to any bribery committed within the UK and to individuals and corporations carrying on business in the UK, regardless of where the bribery occurs. Therefore, the Bribery Act prohibits payments made to not only governmental entities or officials, but also payments to employees or agents of other companies, those between and among non-foreign officials and facilitation payments, as well as any payments made to foreign officials.

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 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, Chief Compliance Officer, Chief Operating Officer – Symmetry Surgical, or General Counsel. If one or more of the foregoing are involved in the issue regarding which you are concerned, please contact the Chairman of the Company’s Audit Committee via any of the reporting means set forth in Section XV on page 10.

III. Government Investigations

Symmetry’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 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 requires that you immediately notify an Executive Officer. You may not provide Symmetry 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 Board. A conflict of interest exists when a person’s personal or private interests interfere, or even appear to interfere, in any way with Symmetry’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 personnel take actions or have interests that may make it difficult for, or raise questions as to whether, such Symmetry personnel can perform his or her work for Symmetry objectively and effectively. Conflicts of interests may also arise when an employee, officer or director, or members of his or her family, receive any personal benefits as a result of his or her position with Symmetry. You may not obtain any financial benefit as a result of your position with Symmetry apart from what is provided to you under Symmetry’s compensation and benefit programs.

It is a conflict of interest for a Symmetry employee to work simultaneously for a competitor, customer or supplier unless preapproved by the Company’s Board of Directors. 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's behalf. Conflicts of interest may not always be clear, so if you have a question, you should consult with an Executive Officer.

V. Corporate Opportunities

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

With prior approval, Symmetry employees acting in their capacity as an agent of Symmetry, 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 encourages this involvement in the community by its employees. However, any fees, honorariums or reimbursements must be transferred to Symmetry unless written approval is given to retain them.

VI. Confidentiality

Symmetry Personnel are prohibited from using any proprietary or confidential information of Symmetry or its customers for their personal benefit. You may also not disclose or permit the disclosure of proprietary or confidential information of Symmetry or its customers to non-Symmetry personnel, except when authorized by the General Counsel, or when such disclosure is legally mandated by applicable laws or regulations. You must use appropriate judgment when disclosing any proprietary or confidential information to other Symmetry 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, or harmful to Symmetry or its customers, if disclosed. 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 ends.

VII. Fair Dealing

Symmetry 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'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'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 personnel should not disparage competitors' products, their services or employees. Comparisons of Symmetry'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 Personnel or family member¹ of any Symmetry 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 maintains a policy regarding interactions with healthcare professionals which provides that no Symmetry 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 products or as a reward for prior use or purchase of Symmetry products. If you have questions regarding this policy please consult an Executive Officer or the Policy, which is in the Corporate Control intranet site. 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.

VIII. Discrimination, Harassment and Fair Treatment of Employees

Symmetry 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.

A. Discrimination. Symmetry 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'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 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.

¹ As used in this Code, "Family Members" include a spouse, children, stepchildren, grandchildren, parents, stepparents, siblings, grandparents, in-laws, and any person living in the same household as the director, officer or employee.



- 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.

B. Harassment. Symmetry 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's policies. It is against the law and Symmetry'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.

C. Reporting Discrimination or Harassment.

Any employee who has seen, heard or otherwise known of an incident of harassment or discrimination under this policy is required to report the incident to the Human Resources Department via the SVP of Human Resources at the Company's headquarters at (574) 268-2252 or through the harassment/discrimination reporting



hotline at empcomment@symmetrymedical.com. Symmetry will conduct a thorough, timely and impartial investigation of all complaints of harassment or discrimination. Such reports 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 or discrimination. Any employee who has been found to have harassed or discriminated against another employee in violation of this policy will be subject to disciplinary action up to and including discharge.

IX. Nepotism

The potential for conflict of interest clearly exists if a family member also works at Symmetry and is in a direct reporting relationship with you. Employees should not directly supervise, report to, or be in a position to influence the hiring, work assignments or evaluations of someone who is a family member or with whom they have a romantic relationship. If such a relationship arises you must raise it immediately with your Human Resources manager.

X. Health and Safety

Symmetry 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'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 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 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.

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 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'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's transactions and conform both to applicable legal requirements and to Symmetry'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'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's records should always be retained or destroyed according to Symmetry'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 Assets

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

The obligation of Symmetry Personnel to protect Symmetry'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

It is Symmetry's policy to provide full, fair, accurate, timely and understandable disclosures in all reports and documents Symmetry files with or submits to the Securities and Exchange Commission, as well as in all of its other public communications. 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. Requests from customers, investors, analysts and other third parties for information about Symmetry or its business should always be directed to the CEO or CFO.

The CEO and each senior financial officer shall promptly bring to the attention of the Audit Committee any 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 and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal control over financial reporting.

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.

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 Audit Committee in any of the following ways:

- Send a written report (signed or anonymous) to the attention of the Audit Committee, Symmetry Medical Inc., 3724 North State Road 15, Warsaw, IN 46582;
- Email the Audit Committee at Ombudsman@Symmetrymedical.com (this email address is also available in your company's Global Address Book);
- Report the matter by calling toll-free at 1-877-856-2091 and leaving information about the matter in a confidential voice mailbox.

Reports may also be submitted to the following individuals:

- The Chief Executive Officer;
- The Chief Financial Officer;
- The Internal Audit Director;
- 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 Audit Committee.

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 Audit Committee will oversee the receipt and handling of allegations of Code violations, including directing an appropriate investigation and response. The Audit Committee may, at its discretion, direct the Internal Audit Director to conduct any or all portions of the investigation. Regardless of which group conducts an investigation, all Symmetry personnel are expected to cooperate with investigations of Code violations. Based on the conclusions drawn after its investigation, the Audit Committee 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 Audit Committee 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.

XV. 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 XIV above.

XVI. 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 Chief Compliance Officer, as outlined in Symmetry's Standard Operating Procedure #HQ06 or pursuant to Section XIV hereof.