

Declaration Regarding California Law SB 1765

July 1, 2005

Zimmer Holdings, Inc. has a comprehensive compliance program for its United States operations that is consistent with voluntary guidelines published by the Office of Inspector General of the United States Department of Health and Human Services. The program is embodied in the principles of our Code of Business Conduct. As a medical device manufacturer, Zimmer's United States compliance policies and procedures address the provisions of the voluntary AdvaMed Code of Ethics for Interactions with Health Care Professionals, published by the Advanced Medical Technology Association ("AdvaMed"). The AdvaMed Code was developed to provide guidance specifically to the medical device industry. The AdvaMed Code is the equivalent to the voluntary Pharmaceutical Research and Manufacturers of America Code on Interactions with Healthcare Professionals, which was designed to provide guidance to the pharmaceutical industry.

As of the date of this declaration, Zimmer believes that its United States operations were in material compliance with its comprehensive compliance program and the provisions of Section 119402 of the California Health and Safety Code.

This declaration is made solely for the purpose of complying with the California law cited above and should not be read in isolation from the Company's other discussions of its compliance related activities and information disclosed currently or in the future in its periodic reports, press releases and elsewhere.

To see a copy of Zimmer's [Code of Business Conduct](#) please [click here](#). To obtain a copy of Zimmer's Code of Business Conduct and this declaration contact 1-866-688-7656.