

# Code of Business Conduct



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# Introduction

Through the continuous improvement of its services, the Ivoclar Group strives to sustainably increase its value for its patients, customers, partners, employees, shareholders and the society. We know that we can only achieve this goal if success is based on ethical, righteous and impeccable business conduct. Therefore, a commendable management as well as employees working on highest level of integrity and correct conduct, who consistently align their actions with basic ethical values and legal framework, are essential.

The Ivoclar Group's Code of Business Conduct sets the standard for the way in which we deal with stakeholders inside and outside of the Group. The managers and the employees are equally responsible for abiding by the provisions of this Code.

In addition to the respective legal provisions, this Code of Business Conduct applies as a binding action framework to all employees of the Ivoclar Group. Details of the Code are defined in guidelines that take into account the particularities of the different countries.

Our corporate values as well as the way in which we achieve our corporate objectives are just as important as the achievement of the objectives themselves.



A handwritten signature of Markus Heinz in blue ink. The signature is written in a cursive, flowing style.

**Markus Heinz**  
Chief Executive Officer

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## 1. Relations among each other

We create a favourable working environment by treating each other with respect, dignity and professionalism. At Ivoclar Group, people are hired and promoted on the basis of their skills and achievements.

We do not tolerate any kind of bullying, harassment or discrimination based on race or ethnic origin, skin colour, language, gender, age, sexual orientation, religion or protected beliefs.

## 2. Interaction with business partners

We place great importance to the development of our business relations. However, these relationships can never be more important than our ethical principles, which commit us to honesty, integrity and adherence to the legal requirements.

We select our business partners solely on the basis of objective and business-related criteria. We make sure that our business partners share our rules of conduct regarding business behaviour and ethics.

We do not give or accept any business courtesies that could influence business decisions. We do not tolerate bribery and have established clear rules against corruption. Donations and other benefits must also be transparent. Under no circumstances may they be made dependent on the purchase of our products or used to achieve a direct business advantage.

## 3. Dealing with public officials, politically exposed persons/parties

It should be noted that the law is extremely strict regarding possible criminal liability when dealing with public officials, and that a higher standard must regularly be applied to benefits granted to such persons. We therefore do not make any payments or provide any monetary benefits to public officials, politically exposed persons or political parties. Payments to officials or representatives of public authorities to expedite official procedures are strictly prohibited.

## 4. Behavior towards competitors

We act fairly in our conduct with our competitors. We do not participate in unfair competitive behaviour such as unlawful agreements on prices and product characteristics or in the abuse of a dominant market position.

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## 5. General business conduct

### 5.1. Adherence to legal requirements

We are committed to abiding by the laws, regulations and guidelines. We expect our employees to be aware of and comply with the legal requirements in connection with their work.

### 5.2. Quality

Our business success in the market depends on high-quality products which meet the expectations of our customers. Our employees contribute to our success by taking responsibility for the quality of their work and for continuously improving it. The managers are responsible for demanding and implementing quality.

### 5.3. Financial integrity

Through careful, complete and punctual documentation of business transactions, we ensure that the accounts are kept in accordance with reporting standards and truthfully reflect the results of business activities. The Ivoclar Group supports the fight against money laundering, corruption and fiscal offences. If there is any doubt about the legitimacy of certain financial transactions, in particular cash transfers, the financial department in charge must be notified.

### 5.4. Protection of business secrets and intellectual property

Company and business secrets must be treated confidentially and protected. This also applies to other information that the Ivoclar Group, contract partners and customers have an interest in keeping confidential.

### 5.5. Protection of personal data

The protection of privacy when processing personal data is a serious concern for us and is taken into account in our business processes.

### 5.6. Handling of company assets

We protect company assets by carefully handling company property, intellectual property rights and company information in order to avoid loss, theft or damage. The equipment and information systems of Ivoclar Group are intended for business use. Moderate private use is only permissible if it does not violate the company's interests.

### 5.7. Communication and media

We provide factual and timely information. Communications to the public, in particular to media representatives, are made exclusively by or in consultation with the Corporate Communications Department or by local Country Management, members of Corporate Management or employees commissioned by them.

### 5.8. Health, safety and environment

We protect our health and safety by complying with the guidelines governing the prevention of accidents and by being committed to responsible protections of the environment at every workstation.

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## 6. Conflicts of interest

Employees are expected to act in the best interest of the Ivoclar Group. Should potential, actual or perceptible conflicts of interest emerge, transparency is required from employees.

Conflicts of interest may arise, for example, in connection with

- ✓ personal relationships within the Ivoclar Group,
- ✓ external mandates in politics or other companies,
- ✓ secondary employments in other companies,
- ✓ private investments or other financial interests (e.g. shareholdings in business partners or competitors and similar),
- ✓ gifts, payments, invitations or other benefits from business partners, etc.

Should such situations arise, the employee is expected to:

- 1) assess the situation correctly, and
- 2) ideally, avoid conflicts of interest as soon as they are identified,
- 3) if unavoidable, report the situation to his or her superior (in the interests of transparency),
- 4) the supervisor assesses the situation objectively together with the People & Culture department and, if necessary, the local Compliance Agent,
- 5) and the supervisor makes a corresponding decision in the interest of the Ivoclar Group, taking the utmost care possible to protect the interests of all parties involved; this decision is to be duly documented.

## 7. Obligation to report suspected misconduct

Any form of misconduct may harm the Ivoclar Group, its employees, business partners and, consequently, patients. A case of misconduct can have serious and unforeseeable consequences for the entire Group.

Employees are therefore obliged to report any suspected misconduct. For this purpose, the Ivoclar Group has installed the "Tell Me" reporting channel, under which such a report can be submitted worldwide and at any time.

The submission of a report is possible at any time for both employees and external persons via the global website of the Ivoclar Group or directly at <https://www.bkms-system.ch/ivoclar>.

Omitting the submission of important reports can also be considered an individual misconduct on the part of the employee who is aware of a serious incident.

Any employee who reports suspected misconduct to the best of his or her knowledge and belief will be protected by the Ivoclar Group against any retaliatory measures or reprisals. The Ivoclar Group will not tolerate any sanctions against employees who report actual or suspected violations.

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## 8. Compliance program

### 8.1. Implementation

The Compliance Program of the Ivoclar Group is headed by the Corporate Compliance Officer, who is responsible for the development, implementation and control of the program throughout the company. The Corporate Compliance Officer is supported by the Compliance Board of the Ivoclar Group.

Local Compliance Agents are responsible for the implementation of the program in the subsidiaries of the respective countries in accordance with the instructions provided by the Corporate Compliance Officer.

Each employee receives a copy of this Code of Business Conduct. Training courses on Integrity & Compliance are held regularly. In addition, compliance with the Code of Business Conduct is also integrated into the annual dialogue.

All employees are committed to the implementation of this Code of Conduct. Illegal or unethical actions cannot be justified by the fact that they are carried out by order of third parties, including superiors.

The members of the Corporate Management and the executives of the Ivoclar Group have a particular responsibility for the implementation of the Code. They are expected to act exemplary in observing the basic values and principles of conduct contained in the Code of Business Conduct and, coherently, demand the corresponding conduct from their employees.

### 8.2. Violations and sanctions

Employees who violate or tolerate violations of the Code of Business Conduct, besides disciplinary measures, may also be subject to other consequences under employment law – up to and including termination of employment agreement.

### 8.3. Advice and reporting of infringements

If you have any questions regarding the Code of Business Conduct, individual compliance guidelines or any other compliance topic, please contact your superior, your responsible Compliance Agent, the Corporate Compliance Officer or use the reporting channel mentioned under item 7.

You can also report a suspected violation of the Code of Business Conduct or of other rules to these persons or to the People & Culture department.