

Straumann Group Code of Conduct for External Business Partners

1. Introduction

The Straumann Group is committed to sustainability in all business areas and aims to apply high ethical standards. Our External Business partners play a critical role in this respect.

This Code for External Business Partners (ExBPs) reflects the Straumann Group's purpose and mission: "We exist to unlock the potential in people's lives". We strive to become the most customer focused and innovative oral health company in the world. We seek to extend our commitment to ethical behavior/good corporate citizenship to our relationships with our ExBPs in general. We do this because we believe that these values are fundamental to long-term sustainable development and are thus in the interest of all our stakeholders, especially our staff, shareholders, customers, business partners and the communities in which we operate. This Code reflects our company's core beliefs, that bring our purpose to life.

This Code is based on the principles of:

- Legal compliance
- Ethical business behavior
- Fair, safe and respectful treatment of people working in the supply chain
- Protection and respect for the environment
- Safeguarding privacy through proper use of confidential information to ensure that the privacy rights of employees and patients are protected.

It is our expectation that this Code applies to ExBPs of the Straumann Group, including their employees, worldwide.

This Code uses principles of the following as a basis:

- Straumann Group's Code of Conduct
- The United Nations' Universal Declaration of Human Rights
- The United Nations' Convention on the Rights of the Child
- The ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights

- The United Nations Global Compact Principles
- The UK Modern Slavery Act 2015
- Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO), 2022

2. Straumann's commitment

Straumann is committed to comply with the principles of this Code and expects its ExBPs to comply with it also. The Group also commits to cooperate actively and communicate transparently with its ExBPs to promote these principles. Further details on Straumann's commitment to responsible and ethical corporate behavior are specified in the Group's Code of Conduct, available on Straumann's website.

3. External Business Partner's commitment

Straumann expects its ExBPs to observe the following:

Compliance with laws and regulations

In addition to the provisions of this Code, ExBPs must fully comply with all local, national and international laws relevant for their business. They must also ensure that their employees are aware of their obligations in this regard.

ExBPs must also ensure that their respective business partners (e.g. subcontractors), with whom they do business on Straumann's behalf, comply with all applicable laws, regulations and industry codes, as well as Straumann's integrity standards.

Ethical business practices

Straumann expects its ExBPs to conduct their business practices ethically. ExBPs are required to deal fairly and honestly with all business partners, customers, and competitors and not to take unfair advantage through manipulation, bribery, concealment, abuse of privileged, confidential, or trade-secret information, misrepresentation of material facts, or any unfair dealing practice. This includes specifically:

- *Anti-Corruption:* ExBPs must not engage in active or passive corruption, including accepting from or giving to any person or business organization that does business with or seeks business with the ExBP, any material gifts, money, donations, hospitality or vacations etc, with the intent of benefitting the ExBP.
- *Free competition:* ExBPs must respect antitrust laws and refrain from anti-competitive actions – not to enter agreements, understandings or alliances that limit or are intended to limit competition; not to enter into illegal tying or bundling agreements; not to use artificial pricing schemes to stifle competition.
- *Truthful marketing:* ExBPs' advertising and marketing practices should be designed to convey honest, substantiated information; marketing or sales practices that are illicit or dishonest must be excluded.
- *IP and confidential information protection:* ExBPs must respect international intellectual property rights, and refrain from disclosing confidential information about Straumann or other business partners to unauthorized persons.
- *Compliance with government investigations:* ExBPs must cooperate fully with government investigators.

In case of reasonable suspicion of non-compliant behaviour of the ExBP, the ExBP will fully collaborate with any requests of information, documents or assistance arising out of an audit by Straumann or an independent third party. In case Straumann is subject to an investigation of authorities, ExBP will fully collaborate with any requests for information, documents or assistance arising out of the investigation.

Fair and safe working conditions

Straumann is committed to working with ExBPs that respect human rights and provide equal opportunity in all aspects of employment. Straumann does not tolerate illegal discrimination and requires its ExBPs to behave in a responsible and fair manner towards their employees. This includes:

- *Protection from discrimination and sexual harassment:* ExBPs shall ensure that no employee is discriminated against because of gender, race, background, religion, or sexual orientation; and shall ensure that all employees are protected from sexual harassment.
- *Exclusion of child and forced labor, modern slavery and human trafficking:* ExBPs shall have no reasonable suspicion that there is child labor or forced labor in their organization or supply chain. Also ExBPs are expected to uphold administrative processes to exclude activities within their organization or supply chain associated with slavery or human trafficking.
- *Respect for rights of free association:* ExBPs are expected to allow freedom of association, including the right to collective bargaining and trade unions, in compliance with relevant laws and regulations.

- *Adequate remuneration:* ExBPs are expected to provide their employees a “viable wage” and compensation according to the legal requirements. Wages shall be paid in legal tender and on a regular basis.
- *Safe workplaces:* ExBPs must ensure that their employees are offered a safe and healthy working environment. Adequate sanitary conditions, health and safety policies and procedures must be established and followed.
- *‘Whistleblower’ Protection:* Wherever legally permissible, ExBPs should ensure the protection of staff and ‘whistleblower’ confidentiality and to prohibit retaliation against workers who participate in such programs.

Environmental protection

Straumann seeks to protect the environment throughout its supply chain. The Group expects its ExBPs to observe:

- *Environmental compliance:* All applicable laws and regulations related to environmental protection must be observed.
- *Proactive environmental management:* Environmental protection should be considered an integral part of doing business, with every reasonable effort made to minimize the environmental impacts of operations, products, and services as far as this is practical in a spirit of continuous improvement.

4. Implementation and monitoring

Straumann expects ExBPs to comply with the provisions laid out in this ExBP Code of Conduct. This Code is made available to all ExBPs in English. Straumann may ask certain ExBPs to extend this Code to selected sub-suppliers.

ExBP are expected to abide by the provisions of this Code, as a precondition to doing business with Straumann. Straumann may monitor certain ExBPs to evaluate their compliance with this Code.

Straumann’s major ExBPs, are required to sign this ExBP Code periodically as written confirmation of their commitment to abide by its provisions.

5. Non-Compliance

Any non-compliance by an ExBP with the provisions and requirements of this Code is treated as a violation of substantial contractual obligations. If the ExBP fails to correct this non-compliance, Straumann is committed to seeking an alternative ExBP who is willing and able to comply with this Code.

5.1. Reporting violations

Straumann encourages External Business Partners to raise concerns about potential violations of our Code.

The Straumann Group Compliance Hotline for External Business partners can be accessed via this [Link](#).