

IVOCLAR VIVADENT

Code of Business Conduct

INTRODUCTION

Ivoclar Vivadent AG strives to increase the company value for its customers, partners, employees and shareholders by continuously building its capacity to compete. We understand that we can only achieve this objective if our success is based on fair and honest business conduct. Therefore, managers and employees have to be people of integrity whose actions are guided by fundamental ethical values.

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

This Code establishes the binding framework of action for all the employees of the Ivoclar Vivadent group of companies. Details of the Code are defined in guidelines that take into account the particularities of the different countries.

Robert A Ganley
CEO



1 RELATIONS AMONG OTHERS

We create a favourable working environment by treating each other with respect, dignity and professionalism. At Ivoclar Vivadent, we employ people because of their skills and performance, which they are encouraged to develop accordingly. We do not tolerate bullying, harassment or discrimination.

2 INTERACTION WITH BUSINESS PARTNERS

We attach great importance to the development of our business relations. Nevertheless, the cultivation of these contacts is never more important than the upholding of our ethical principles, which commit us to honesty, integrity and the adherence to legal provisions. We choose our business partners exclusively on the basis of objective business-related criteria. We make sure that our business partners share our views on business conduct and ethics.

We do not give or accept any gifts or favours that could influence business decisions. We do not tolerate bribery. Donations must be transparent. They must not depend on the purchase of our products. Furthermore, donations must not be used to achieve a direct business advantage.

3 DEALING WITH OFFICIALS AND POLITICALLY EXPOSED PERSONS/PARTIES

It is important to note that the laws governing the bribery of officials are extremely strict. We do not make payments or give gratuities to officials, politically exposed persons or political parties. Facilitation payments to officials or representatives of public authorities to expedite routine administrative procedures are strictly prohibited.

4 BEHAVIOUR TOWARDS COMPETITORS

We are fair in our conduct towards our competitors. We do not participate in unfair competitive behaviour, for example, illegal price fixing and abuse of dominant position in the market.

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5 GENERAL BUSINESS CONDUCT

5.1 Adherence to legal provisions

We are committed to abiding by the law and adhering to regulations and guidelines. We expect our co-workers to be aware of and comply with the legal requirements governing their duties.

5.2 Quality

Our business success depends on high-quality products that fulfil the expectations of our customers. Our employees contribute to this 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

By carefully, thoroughly and punctually recording business processes, we ensure that our accounting is conducted in accordance with reporting standards and that the results truthfully reflect the business activities. Ivoclar Vivadent supports the fight against money laundering, corruption and financial crime. If there is some 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

Business and trade secrets must be protected and handled confidentially. This also applies to other information that Ivoclar Vivadent and contracting partners and customers may not wish to disclose.

5.5 Protection of personal information

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

5.6 Conflict of interest

The employees are expected to act in the best interests of Ivoclar Vivadent. If potential or actual conflicts of interests arise as a result of personal interests or interests related to familial or other ties, which could be in conflict with those of the company, the affected employees are expected to inform their supervisor accordingly. Ivoclar Vivadent AG will take the appropriate measures to resolve or prevent the (potential) conflict of interest.

5.7 Handling of corporate assets

We are responsible for protecting corporate assets. Therefore, we are expected to handle company property, intellectual property and company information with care to prevent loss, theft or damage. The equipment and information systems at Ivoclar Vivadent are intended for business use. Judicious private use is only permissible if it does not violate company interests.

5.8 Communication and media

We undertake to provide factual and prompt information. We communicate with the public and media representatives exclusively through and in agreement with the company department responsible for corporate communications.

5.9 Health, safety and the environment

We are committed to protecting our health and safety by observing the guidelines governing the prevention of accidents. In addition, we are responsible for complying with environmentally responsible principles at each work station.

6 COMPLIANCE PROGRAM

6.1 Implementation

Our Compliance Program is headed by the Compliance Board, which is responsible for developing, implementing and driving the program throughout the company. Regional Compliance Representatives in the subsidiaries are responsible for the implementation of the program according to the specifications of the Compliance Board.

Every employee receives a copy of the Code. Training on the topic of compliance is offered at regular intervals. The adherence to the Code is also addressed in the annual performance appraisal. All employees are committed to implementing this Code. Illegal or unethical activities cannot be justified by the fact that they were carried out by order of a third party, including a superior. The members of the Corporate Management and the managers of Ivoclar Vivadent assume a particular responsibility in implementing the Code. They are expected to lead by example and adhere to the fundamental values and basic principles of conduct set down in the Code. Furthermore, they are responsible for demanding the corresponding conduct from their subordinates.

6.2 Violations and sanctions

Employees who violate or tolerate violations of the Code can expect disciplinary measures and legal consequences, including the dissolution of their work contract.

6.3 Guidance and reporting of violations

If you have any questions regarding the Code, any of the guidelines or a compliance-related topic, please contact your superior, your local Compliance Representative or the General Counsel Europe. In addition, you can report any suspected violation of the Code to these people.

Ivoclar Vivadent does not tolerate any retaliation against employees who report actual or suspected violations against the Code of Business Conduct.