

Dentsply Sirona

Business Partner Ethical Action Policy

Vision



“Delivering innovative dental solutions
to improve oral health worldwide”

Our Core Values



We are **one
global team**



We live and breathe **high
performance and
personal accountability**



We demonstrate **passion
for innovation** and shape
the dental industry



We bring out the
best in our people



We act with
**uncompromising
integrity**



We improve the practice of
dentistry with an **unrelenting
commitment to customers**

We Believe Our Business Partners Should Share Our Commitment to Ethically Responsible Conduct

As we continue to move forward and grow globally, we recognize the need for strong, mutually rewarding relationships with our Business Partners who can enhance the quality of our products, services, and processes. Our Business Partners include suppliers of goods and services, distributors of our products, as well as key opinion leaders and consultants assisting us globally in developing new products and speaking on our behalf. We look for business partners who can not only have a successful relationship with us, but those who demonstrate the same strong values and ethical principles that we live by, and who support our commitment to providing quality products and value for our customers. Our shareholders, customers, employees, and even the communities where we work and live, expect honest and ethical conduct from us every day. We believe that it is vital that we and our business partners conduct ourselves in a manner that is ethical, consistent with all applicable laws, and that abides by the sound business practices that we promote.

Dentsply Sirona's Business Partner Ethical Action Policy reaffirms our commitment to the development of relationships based on integrity by outlining what we expect from our business partners, and what our business partners can expect from us. It identifies our core values, and the socially responsible ethical principles that guide our work and how we conduct business, and further serves as a complement to the Dentsply Sirona Code of Business Conduct and Ethics.

Dentsply Sirona, through our board of directors, senior management, and all of our employees, is committed to our core values, and to the highest standards of integrity and full compliance with the regulations, laws, and policies that impact and apply to our business and how we do it. We expect that our business partners will conduct business in the same manner, always demonstrating the highest ethical standards. We have no tolerance for ethical violations. We expect the same from each and every business partner, and will accept nothing less.

Please join us in assuring that Dentsply Sirona remains a strong, successful company with unquestionable ethics. We appreciate your commitment to our mutual success in this.



Don Casey

Don Casey
Chief Executive Officer



Brian O'Reilly

Brian O'Reilly
Chief Compliance Officer

Our Principles for Ethically Responsible Conduct

The Dentsply Sirona Code of Business Conduct and Ethics, together with our specific business policies, provides our employees, suppliers and other business partners with a framework for understanding what we expect of them in terms of conduct and decision-making. It outlines key principles and behaviors that are supportive of and derived from our core values. Our principles for ethically responsible business partner conduct flow from our Code of Business Conduct and Ethics and contain principles and behaviors that serve to define our relationship with our business partners, regardless of whether you supply us or another of our business partners with a product, business service or serve as a speaker, opinion leader or consultant. We expect you to share these principles and behaviors, and to promote them with all of those with whom you do business.

Our basic goals at Dentsply Sirona are to:

- Be consistently compliant - around the globe – with all applicable laws as well as all policies of Dentsply Sirona
- Provide a safe workplace
- Be good corporate citizens and good neighbors in the communities where we work, operate, and live
- Promote basic human rights and dignity and assure that those with whom we conduct business also respect and support this principle
- Be forward looking as we develop new products and services and enhance or improve our existing products and services
- Always strive for continuous improvement

We expect our business partners to share in our values and goals and to abide by this entire policy, and to make it available and known throughout their organization, and to train their employees on this policy or their own policy embracing these same policies and values, to ensure that all employees comply with this policy in its entirety. Lastly, if anyone becomes aware of any violation (or even a potential violation) of this policy, it will be reported to Dentsply Sirona as promptly as possible.

IMPORT – EXPORT AND ETHICAL SOURCING

Dentsply Sirona seeks to comply with all applicable laws and regulations governing importing and exporting products and technology and making them available for sale. This includes production materials, finished goods, capital equipment, molds and tooling, samples and prototypes, repaired and returned products, and technical information, among other things. As our supplier, we expect you to exercise due diligence to ensure that you adopt proper import/export related policies, procedures, and controls within your organization, including proper identification of the third parties with whom you work, where they are located, and where and how they do business, as well as the source locations and countries of origin of the products you supply to us, including their components. As a supplier of products or materials to Dentsply Sirona, this includes responsible participation in Dentsply Sirona's Conflict Minerals program which seeks to verify and eliminate the sourcing of gold, tantalum, tin and tungsten from the Democratic Republic of the Congo and neighboring states for which the profits aid in the continued aggressions and human rights violations in these regions. We also expect you to follow all laws, as well as these policies, when registering our products (where necessary) to make them available for sale. Your failure to do this could expose Dentsply Sirona, along with our customers and other business partners, to significant financial exposure, increased scrutiny from government agencies, harm to individuals, and generally negative publicity. Our position as a good global corporate citizen and our ability to conduct business on a global basis are privileges that we guard carefully and we simply will not allow anyone to jeopardize them.

SERVICES – CONSULTANTS, SPEAKERS, KEY OPINION LEADERS, AGENTS, AND OTHER SERVICE PARTNERS

All Dentsply Sirona Business Partners providing a service to, or on behalf of Dentsply Sirona must comply with all applicable laws and regulations and Dentsply Sirona policies regarding anti- corruption, anti-bribery, and ethical interactions with healthcare professionals as well as with government officials. The Dentsply Sirona Marketing to Professionals Code of Conduct defines how Dentsply Sirona and our business partners will interact with healthcare professionals and ensure compliance with all laws pertaining to these interactions including transfers of value and all transparency and reporting requirements.

HUMAN RIGHTS

We expect our employees and our business partners to treat everyone with dignity and respect. Through our core values, we demonstrate our commitment to being a good global citizen and acting in a socially responsible way wherever we live and work, and we expect our business partners to do the same. We require our businesses and our business partners to provide clean and safe work environments and conditions for all workers, forbid child labor, and require that all workers receive all rights and benefits required by law. Equal opportunity and fair treatment should be extended to all. Dentsply Sirona will not tolerate discrimination on the basis of age, color, disability, ethnicity, marital or family status, national origin, race, religion, sex, sexual orientation, veteran status, or any other characteristic protected by law.

Dentsply Sirona supports global efforts to address the issues of slavery and human trafficking through our internal policies as well as through direct actions with our business partners in our supply chain. We expect all of our employees and business partners to fully comply with the California Transparency in Supply Chain Act of 2010 and the UK Modern Slavery Act of 2015. To this end, every Dentsply Sirona entity engaged in procurement of goods and services from third parties (external to Dentsply Sirona) must establish and maintain a program to assure compliance to these laws. This program will have the following elements:

- A method for identifying those suppliers which represent the greatest risk in terms of potential violations to the provisions of these laws and a structured action plan for those deemed as “high risk”.
- A risk-based audit plan whereby those suppliers identified as high-risk are audited at appropriate intervals for compliance to these laws.
- Purchasing Agreements, Supply Agreements, and/or Purchase Orders will contain language detailing Dentsply Sirona’s expectations of our Supply Chain Partners related to Human Rights and all other ethical concerns outlined in this document. Further detail is provided in the Purchasing Agreements section of this document.
- A written policy or procedure documenting the steps which will be taken for any supplier or employee found to be in non-compliance with our purchasing agreements/ purchase orders related to slavery and human trafficking.

- Documented training of all employees engaged with our supply chain wherein they acknowledge reading, understanding, and commit to complying with the provisions of this policy.

CONFLICTS OF INTEREST

We expect our employees and business partners to identify and prevent situations where there is a conflict of interest, or even the appearance of one. All Dentsply Sirona employees must disclose to their local Human Resource management if they are employed by any company other than Dentsply Sirona. If a conflict of interest is identified, the employee will be advised that continued employment at Dentsply Sirona requires the termination of the relationship with the other employer.

Our employees must not accept anything of value if it would constitute either an inducement to make, or a reward for making, any decision that is favorable to the interests of them or a third party, and not Dentsply Sirona. We expect our business partners to support this policy, to not put our employees in a situation where they may be compromised in their independence or judgment and therefore may be placing their own interests or those of any third party (including any business partner) above Dentsply Sirona's.

PROHIBITION ON IMPROPER PAYMENTS AND GIFTS

To comply with laws of the United States and the United Kingdom prohibiting bribery, as well as the laws of all other countries where it does business, Dentsply Sirona strictly prohibits improper payments, gifts, or any other transfer of value to any person, or promise or offer to do so, regardless of whether the person is a government official or private individual, for the purpose of obtaining or retaining business, or securing any other improper advantage. These actions are prohibited regardless of whether our employees, agents, representatives or business partners do them. Additionally, our business partners must not make any payment in cash or in-kind to any government official on Dentsply Sirona's behalf without approval from Dentsply Sirona's Legal Department. We expect all employees and all of our business partners to fully comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, as well as all local laws governing improper payments and bribes.

ANTITRUST AND COMPETITION LAWS

Competition is part of business, and Dentsply Sirona competes by making superior products, selling them at fair prices, and providing value to our customers. While doing so, we expect our employees, agents, representatives, and supply chain partners to comply fully with all antitrust and competition laws that apply to our and their respective businesses, and to thereby compete fairly. This means not entering into an agreement with or among any competitor(s) that restrains trade or reduces competition – such as agreements to: fix, stabilize or control price; limit output levels or the sale of products; allocate customers or geographic territories; or boycott certain suppliers or customers.

PURCHASING AGREEMENTS

All Supply Agreements, Purchasing Agreements and/or Purchase Orders will contain Compliance and Ethics terms and conditions which mandates all parties' support of all laws and regulations, the Dentsply Sirona Code of Business Conduct and Ethics and the Dentsply Sirona Business Partner Ethical Action Policy. The following statement may be inserted verbatim into all aforementioned agreements:

The Third Party Supplier (Supplier) understands Dentsply Sirona's commitment and policies related to Anti-corruption, Human Rights, Conflict of Interest, Prohibition on Improper Payments and Gifts, as well as Antitrust and Competition Laws. The Supplier agrees to comply with all provision of the Dentsply Sirona Business Code of Conduct and Ethics as well as the Dentsply Sirona Business Partner Ethical Action Policy and will cooperate with Dentsply Sirona's requests related to compliance to Conflict Minerals laws and Human Trafficking and Modern Slavery laws including on-site audits if requested by Dentsply Sirona.

YOUR RESPONSIBILITY

As a business partner, your role does not end with simply understanding Dentsply Sirona's values and principles. If any ethical or legal compliance issues arise that raise questions in your mind, we expect you to bring them to our attention. If you raise a concern, you may choose to remain anonymous (though identifying yourself may aid in our investigation of the matter). Regardless, we will treat your concern as confidential to the full extent permitted by law.

To raise a concern you can call Dentsply Sirona's confidential, toll-free Business Ethics Reporting Hotline at 800-461-9330 or a toll free number specific to your location which can be found on ONE Dentsply or by contacting a Dentsply Sirona Compliance professional. The Helpline is available 7 days a week, 24 hours a day.

You may also report a concern via the internet at: www.dentsplysirona.com/ethics-hotline

In addition, you may reach out to your primary business contact at Dentsply Sirona, or the Chief Compliance Officer, the General Counsel, or a member of the General Counsel's staff to report your concern, and you may do so either by telephone or email. You can find the telephone numbers and email addresses of the Chief Compliance Officer as well as the General Counsel and staff on Dentsply Sirona's corporate website.