

**STRAUMANN GROUP  
CODE OF CONDUCT**



## DEAR COLLEAGUES

Our people and our culture are the greatest assets of the Straumann Group. They enable us to fulfill our purpose to unlock the potential of people's lives and to drive results.

Our culture is shaped by our mindset and beliefs which drive behavior and behavior drives culture. Beliefs form the foundation of how we conduct business, guide our decisions and shape our processes throughout the company.

### BELIEFS DRIVE BEHAVIOR, BEHAVIOR DRIVES CULTURE AND CULTURE DRIVES RESULTS

We are bold and big in our thinking. Our entrepreneurial mindsets give us the courage to seize opportunities.

We strive for true impact through progress, not perfection, as speed matters in our business.

We empower and inspire everyone around us to achieve collective success.

We are accountable, keep our promises and deliver on expectations.

We create environments where everyone has a voice and a contribution to make.

We are hungry to grow and develop with the humility and curiosity to learn from each other.



Building on our legacy, we do this in a sustainable manner by acting with responsibility – one of our commitments of the sustainability framework.

This is where the Code of Conduct comes into play which describes our position and requirements for ethical behavior and good corporate citizenship, including respect for human rights and the environment which are fundamental to sustainable development and acting with integrity. For details about our purpose and core beliefs please visit our [Intranet](#).

This Code of Conduct is designed to ensure that the companies and individual employees of the Straumann Group conduct business in a legal, ethical, and responsible manner, in compliance with these local and international laws, regulations, and requirements as a minimum.

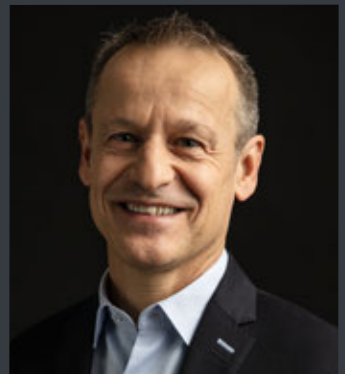
We all have the responsibility to protect the reputation of our company and live it by integrating in our daily business activities. We strive for highest standard of integrity and a zero tolerance policy.

The Code has been approved by Straumann's Board of Directors. It is essential that all our employees are familiar with it and conduct business in accordance with it. To ensure that the Code of Conduct is known throughout the Group, it has been translated into 18 languages and is integral part of the employment agreement of each employee.

Thank you for your commitment and engagement.  
Basel, June 2022



**Gilbert Achermann**  
Chairman of the Board



**Guillaume Daniellot**  
CEO



# CONTENTS

<b>GUIDING PRINCIPLES</b>	<b>6</b>
A code for every employee	6
Common sense	7
Building trust	7
<b>ETHICAL AND LEGAL REQUIREMENTS</b>	<b>8</b>
Fair and honest business practices	8
Fair competition	9
Regulatory and marketing practices	9
Anti-bribery and corruption	10
Conflict of interest	11
Proprietary information	12
Government or regulatory investigations	13
Accurate Books and Records	13
<b>CARE FOR PEOPLE</b>	<b>14</b>
Health and safety	14
Equal opportunity and harassment	14
Appropriate language	15
Privacy and data protection	15
<b>CARE FOR PROPERTY, THE COMMUNITY AND THE ENVIRONMENT</b>	<b>16</b>
Respect for the community and the environment	16
Protection of property and assets	17
Confidentiality, intellectual property, and insider trading	19
Reputation	20
External communication	20
<b>WHEN AND HOW TO REPORT A COMPLIANCE ISSUE</b>	<b>21</b>
Getting advice	21
Reporting misconduct	21
<b>CONSEQUENCES OF MISCONDUCT</b>	<b>22</b>
Disciplinary measures	22
<b>COMPLIANCE</b>	<b>22</b>
<b>APPENDIX</b>	<b>23</b>
Internal guidelines and regulations	23

## GUIDING PRINCIPLES

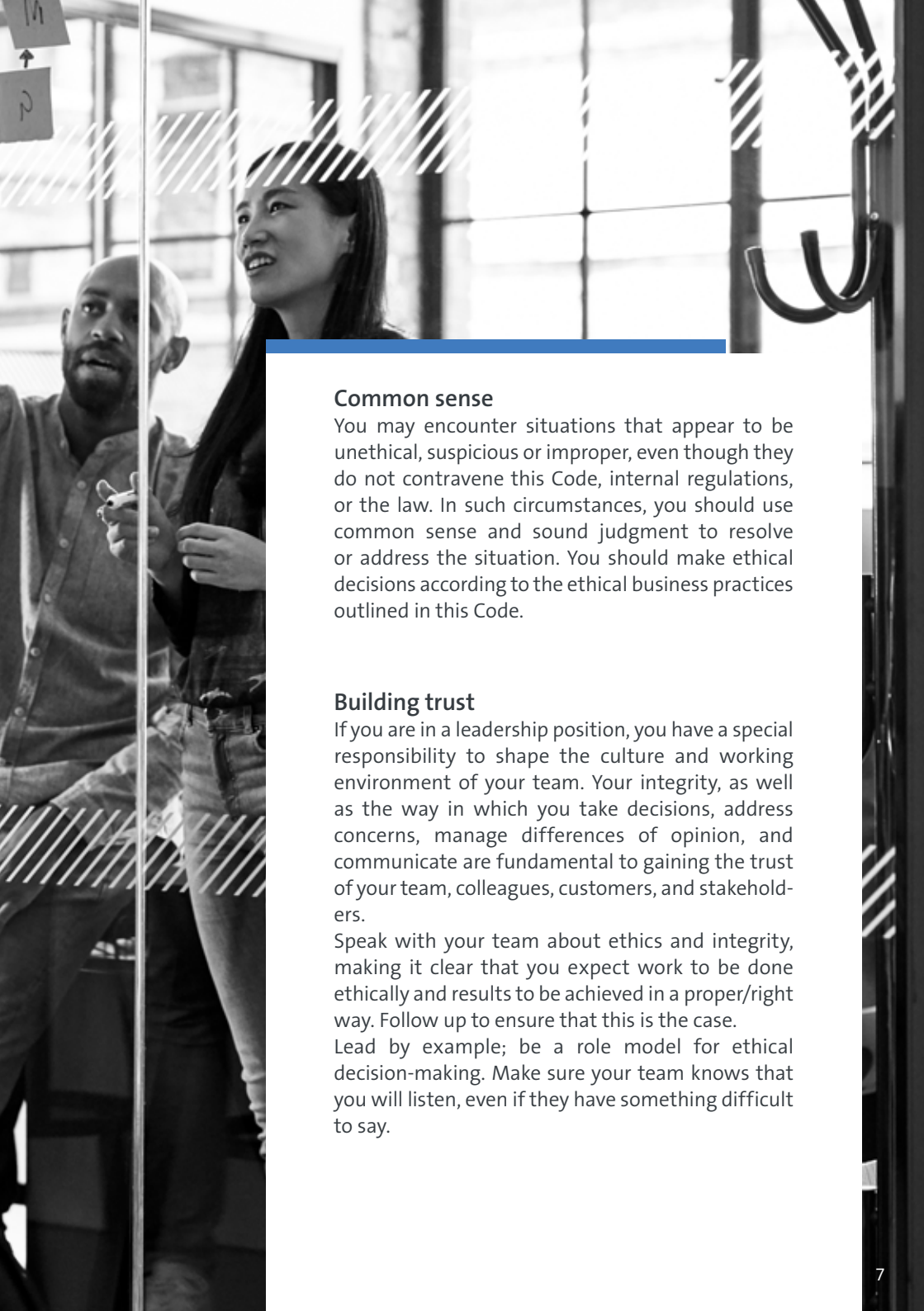
This Code is based on the principles of:

- ethical and legal business behavior,
- fair and respectful treatment of customers / commercial partners, society in general, the authorities, and the environment,
- fair and respectful treatment of all employees of the Straumann Group ('the Group'), and
- commitment to the Group, its reputation and corporate goals.

It complements other Corporate Policies and internal regulations, which may vary from country to country to reflect local business practices. This Code takes precedent over internal regulations and is the basis for their interpretation and application.

### **A code for every employee**

As an employee of the Straumann Group you must follow this Code and should make every effort to ensure that your colleagues also follow it. You are required to familiarize yourself with it and other internal regulations, policies, standard operating procedures and directives. You must also be familiar with the laws that apply to your own field of responsibility and those of people under your supervision. If there is any conflict between national, state or local laws or regulations and this Code, you must comply with the applicable law or regulations.



### **Common sense**

You may encounter situations that appear to be unethical, suspicious or improper, even though they do not contravene this Code, internal regulations, or the law. In such circumstances, you should use common sense and sound judgment to resolve or address the situation. You should make ethical decisions according to the ethical business practices outlined in this Code.

### **Building trust**

If you are in a leadership position, you have a special responsibility to shape the culture and working environment of your team. Your integrity, as well as the way in which you take decisions, address concerns, manage differences of opinion, and communicate are fundamental to gaining the trust of your team, colleagues, customers, and stakeholders.

Speak with your team about ethics and integrity, making it clear that you expect work to be done ethically and results to be achieved in a proper/right way. Follow up to ensure that this is the case.

Lead by example; be a role model for ethical decision-making. Make sure your team knows that you will listen, even if they have something difficult to say.



# ETHICAL AND LEGAL REQUIREMENTS

## Fair and honest business practices

The Group prohibits unethical or illegal business practices. You must deal fairly and honestly with our business partners, customers, and competitors. You must not take unfair advantage of anyone through manipulation, bribery, concealment, abuse of privileged, confidential, or trade-secret information, misrepresentation of facts, or any unfair dealing.

The Group has country-specific policies and procedures that govern the interaction of employees with customers and clients, including individuals, companies, organizations, and anyone who uses, orders, purchases, or recommends our products and services. You are expected to understand and adhere to those policies and procedures.







## Fair competition

Antitrust laws are designed to ensure free and open competition. In this respect, employees are prohibited from collaborating with competitors or from taking any action that could have an improper anti-competitive effect.

To avoid even the appearance of antitrust violation, you should never become involved in discussions with competitors about pricing, the terms and conditions under which products are sold, or other competitively-sensitive information.

### Examples of unfair competition:

- Entering agreements, understandings or alliances that limit or are intended to limit competition
- Entering illegal tying or bundling agreements

## Regulatory and marketing practices

Our products are regulated by governmental agencies, ministries of health, and other regulatory bodies/authorities around the world. Regulatory requirements also affect the way in which we are able to market our products. Each employee is responsible for complying with such product and marketing regulations and requirements.

The Group only allows legitimate and honest marketing and sales practices. Our advertising and marketing practices should convey honest information concerning our products, solutions and services and should include substantiating evidence where appropriate.




### **Anti-bribery and corruption**

In addition to monetary payments, bribes can include valuable favors, free services, donations and other advantages. It is never good business to offer or pay bribes. International anticorruption laws apply to our operations around the world. It is never acceptable to offer, authorize or receive any form of bribe, 'kickback' or 'facilitation payment' to or from a private individual, a public official or any third party – neither directly nor indirectly (e.g. through an agent or third party).

#### Examples of bribery:

- Payments or favors to officials to influence governmental actions
- Unofficial facilitation payments to expedite an approval/ authorization or to import goods
- Donations to third parties at the request or direction of another party
- Accepting a gift, money or service from someone with whom we do business or someone who is hoping to do business with us.
- Offering a gift, money or service to someone with whom we do business.



## Conflict of interest

You have a duty to take business decisions that are in the Group's best interests. You are responsible for avoiding any situation that might lead to – or give the appearance of – a conflict of interest. Such conflicts arise when:

- an employee's private interests interfere or appear to interfere with the interests of the Group,
- employees are guided or influenced by gain or benefits for themselves, their family, friends or close personal acquaintances,
- an employee has a significant financial interest in a business that conducts or seeks business with a Group company or a competitor
- extraordinary benefits, such as material gifts, donations, hospitality, personal discounts, holidays etc are accepted from any person or business organization that conducts/ seeks business with any of our Group companies or is a competitor.

This Code does not prohibit employees from accepting occasional gifts of small value, provided that it does not create a conflict of interest or the appearance of a conflict of interest. However, the acceptance of such gifts must be reported using the Gift Reporting Form available on [our.straumann](http://our.straumann). Under no circumstances should you accept gifts of money.

### Examples of conflicts or potential conflicts of interests:

- Offering work or contracts to family members or friends or to companies associated with them
- Using the services or products of a company in which you or a member of your family has a personal interest (e.g. your husband's company or the company where your daughter is a sales rep)
- Donations to third parties at the request or direction of another party
- Accepting an invitation from e.g. a supplier or a customer to a sports, entertainment, dinner or similar event, that would otherwise cost more than a small amount.



### **Proprietary information**

Employees need to understand the competitive environment and are required to gather information on our competitors and markets. However, you must never use illegal or dishonest means to obtain confidential proprietary information from or about any person, company, or competitor. Employees should reject confidential proprietary information offered or owned by third parties.

## **Government or regulatory investigations**

It is important that the Group and its employees actively cooperate with authorized investigations. If you receive any inquiry from the authorities or a government investigator, you must notify your superior and the General Counsel immediately so that appropriate arrangements can be made to comply fully with legal obligations.

During any investigation by the government/authorities, you should not destroy or alter any documents, lie, or make deliberately misleading statements.

## **Accurate books and records**

The Group requires honest and accurate recording and reporting of information in order to make responsible business decisions. Records and reporting should be accurate, complete, fair, timely, understandable, and must not include false or misleading information. This also applies to information, records or submissions for governmental agencies.

You must ensure that all records/reports within your responsibility meet these requirements. In general, employees must create business documents and records that are professional, business-like, and consistent with this Code and other internal regulations.

All assets, liabilities, revenues, expenses and transactions must be recorded properly and accurately in the books and records of the Group companies, in accordance with the relevant legislation, accepted accounting principles and the Group's financial policies/procedures.



# CARE FOR PEOPLE

## Health and safety

Patient safety is of paramount importance to Straumann. You should never behave in a manner that could endanger or compromise the safety and wellbeing of patients. We are also committed to protecting the health and safety of our employees. All Group employees are expected to obey all laws and internal regulations designed to protect health and to ensure a safe working place.

## Equal opportunity and harassment

Respect is fundamental to engagement and performance. A diverse team adds value and supports our ability to serve an increasingly diverse customer base. We therefore foster diversity, equal treatment, and a culture that enables all our employees to develop their potential and to do their best. You need to be aware that certain behavior may be acceptable in one culture but not in others.

The Group does not tolerate discrimination against people based on their gender, ethnicity, race, age, religion, nationality or sexual orientation. Nor do we tolerate harassment (such as sexual harassment) or bullying.

The Group opposes human trafficking, forced labour, and slavery-like practices such as debt bondage, and the sale or exploitation of children.

The Group seeks to work only with suppliers who share these commitments and respect human rights. Employees dealing with suppliers must be familiar with, and implement, the Group's Code of Conduct for Suppliers.

Examples of behaviour that might be considered harassment:

- Language, jokes, gestures related to race, religion, ethnic origin or other personal attributes that may cause humiliation
- Mobbing, bullying, threats of harm or violence
- Unwelcome flirting or sexual advances or showing unwelcome material to someone



### **Appropriate language**

Our words shape our culture. You should not use inappropriate language, exaggerations, derogatory comments about colleagues, business partners, competitors, customers, especially in printed or electronic documents (such as e-mails), and in speech that is public or which may be recorded. Even internal and confidential documents (especially e-mails and text messages) may become public through litigation or otherwise. You are therefore expected to use good judgment and to follow acceptable business practices when preparing such documents and materials.

### **Privacy and data protection**

The Group operates in regions where there are strict regulations concerning data privacy and protection. While these are regional regulations, they can affect activities elsewhere. All employees should therefore be familiar with and implement the Group's regulations on privacy and the protection of personal data.





## CARE FOR PROPERTY, THE COMMUNITY AND THE ENVIRONMENT

### **Respect for the community and the environment**

As a good corporate citizen we expect our staff to behave in a way that respects, protects and promotes the welfare of the communities in which we operate.

We foster a high-performance culture that is committed to the efficient use of energy and resources. In addition to respecting all laws to protect the environment, employees are expected to use energy and resources sparingly and to avoid waste in order to minimize our impact on the environment.

Our facility, quality and other management functions shall encourage employees to consider health, safety and environmental protection as an integral part of their everyday responsibilities.



### **Protection of property and assets**

All employees are responsible for the proper use of Straumann Group facilities, property and equipment. Any suspected theft or fraud must be reported immediately. Employees are not permitted to use or divert Group property, including information and the service of other employees, for personal advantage or use in activities that are not related to the Group.

You are expected to handle company property carefully, to use it for legitimate business purposes only, to use IT equipment securely and in accordance with internal policies, to report the loss or theft of IT equipment immediately.



## Confidentiality, intellectual property, and insider trading

Protecting the Group's intellectual property and confidential information is critical to our success. Everything that is 'internal' needs to stay inside the company. Internal information includes all non-public information about the Group and its associates and may pertain to intellectual property such as patents, trademarks, designs, copyrights, and knowhow. Confidential information also includes trade secrets, such as business and marketing strategy/plans, engineering, manufacturing and commercial ideas, databases, distribution lists, customer information, records, salary and personnel information, unpublished financial data, internal reports etc.

You must safeguard all internal information. The Group prohibits the disclosure of all internal information to unauthorized persons.

The use of confidential information for personal (financial) benefit and the supply of confidential information to others who might use it for financial benefit or to make an investment decision (insider trading) is strictly prohibited and can be a criminal offence.

### Examples of internal/confidential information

- Customer lists/details
- Information about strategy, potential mergers and acquisitions, partnerships, staff changes etc.
- Non disclosed financial information and information on performance of the Group or a local subsidiary
- Information about staff (e.g. addresses, salaries, private phone numbers, vacations)

## Reputation

The Group's reputation is one of our most valuable assets and is fundamental to our success. It can easily and quickly be damaged as a result of misconduct, carelessness, a lack of urgency, not taking responsibility, dishonesty, neglect and other behaviour. Every employee should behave in a way that supports and protects the reputation of the Straumann Group, its companies and partners.

## External communication

The Group has designated specialists to handle external enquiries and to coordinate communications to external audiences. It is important that information passed into the public domain is processed according to the Group's publication guidelines. This also applies to communications posted on the internet.

You must be familiar with and observe the Group's guidelines on the use of Facebook, Twitter and other social media, particularly regarding the approval requirements for mentioning or forwarding information about the Group, its people, customers, products, services, policies etc.

All Group companies and employees must respect the laws, professional codes and ethical principles with regard to the media.

# WHEN AND HOW TO REPORT A COMPLIANCE ISSUE

## Getting advice

If you are uncertain about applicable laws or internal regulations, or if you have any doubts, or concerns about correct behaviour, the right thing is to seek help and advice. It is usually best to speak directly to your superior or your local Compliance Officer. Alternatively or in addition, you may contact your Human Resources manager, the Legal Department, or a Member of Senior Management.

If you have any questions regarding this Code, or doubts as to whether your actions are consistent with it, our internal regulations or the law, please consult the Legal Department.

## Reporting misconduct

By raising compliance concerns employees help to protect themselves and others. You must inform your superior and/or the respective Compliance Hotline for your respective Region if you become aware of – or suspect – any activity that violates or could lead to a violation of this Code, our internal regulations, the law or other external regulations.

Reports of misconduct are investigated according to internal procedures that are in line with the applicable national laws and regulations. The Group will not reprimand, penalize or take action against any employee for making a good-faith report or for participating in the investigation of a good-faith complaint regarding a violation of this Code.

## CONSEQUENCES OF MISCONDUCT

### Disciplinary measures

We are committed to thoroughly investigating any good-faith report pertaining to violations of this Code. Employees who violate this Code or other internal regulations will be subject to appropriate disciplinary action, which may include termination of employment or service.

If an employee takes part in activities that are illegal or competes against the Straumann Group, his/her employment agreement will be terminated immediately.

Action may be taken against employees, who deliberately withhold knowledge of Code breaches / illegal activities or prevent others from reporting them.

## COMPLIANCE

Supervisors and managers must ensure that employees under their supervision understand and comply with this Code and internal regulations. The Group's agents and representatives, including consultants, should also adhere to this Code.





## APPENDIX

### **Internal guidelines and regulations**

The Group has a number of internal guidelines and policies, which apply to various activities, functions and locations. Most are available on our.straumann and/or through Human Resources, including:

- Code of Conduct for Suppliers
- Confidentiality Levels
- Data Privacy
- Gift Reporting
- Insider Trading Policy
- Internal Information Policy
- IT Guidelines
- Employee Regulations (local subsidiaries)
- Marketing Material Guidelines
- Sales Compliance Policy
- Social Media Guidelines
- Sponsoring Guidelines



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