

## **Addendum GRI-Sustainability Reporting to the Straumann Annual Report 2009**

Straumann believes that sustainability is an integral part of business success, and that it is important to integrate sustainability topics in its annual reporting because they provide the context to what has and has not been achieved in the year under review.

In order to increase transparency for shareholders and stakeholders including customers, employees, and members of the communities in which Straumann operates, for the fourth year running, the sustainability reporting within the annual report has been based on the guidelines disseminated by the Global Reporting Initiative. GRI is a non-profit, multi-stakeholder organization that strives to provide companies with a systematic basis for disclosure regarding sustainability performance. The aim is to give stakeholders a framework that facilitates comparison and understanding of disclosed information.

### **A) Detailed GRI Content Index**

The Straumann Annual Report 2009 follows the G3 version of the sustainability reporting guidelines by the Global Reporting Initiative (GRI) at Application Level B. This was confirmed by an Application Level Check conducted by GRI.

A concise GRI Content Index is given within the report on pages 218. In addition, this detailed GRI Index has been produced for those readers interested in the exact location of particular GRI content points within the report.

Application of GRI guidelines at B-Level requires information pertaining to all points of the 'G3 Profile Disclosures' (1.1-4.17 below), to Management Approach Disclosures on Economic (EC), Environmental (EN), Product Responsibility (PR), Labor (LA), Human Rights (HR), and Society (SO) issues. In addition, a minimum of 20 GRI Performance Indicators has to be reported on, covering all of the topics above.

The detailed content table below shows the location of Profile Disclosure, Management Approach Disclosure, and Performance Indicators within the Straumann Annual Report 2009. Concerning Performance Indicators, GRI 'core indicators' are set in black typeface and indicators that GRI sees as less universally relevant to corporate reporting, so called 'additional indicators' are set in grey. GRI content points that are discussed in the report are marked with a green field referring to the relevant chapters and page numbers. The indicators reported on are discussed to the extent that data were available.

NR	GRI-G3 Content Index	Page in report/remarks
<b>Profile</b>		
<b>1</b>	<b>Strategy and Analysis</b>	
1.1	Statement from the most senior decision-maker of the organization (e.g. CEO, chair, or equivalent senior position) about the relevance of sustainability to the organization and its strategy.	Our responsibility, 59
1.2	Description of key impacts, risks, and opportunities: 1) the organization's key impacts on sustainability and effects on stakeholders, including rights as defined by national laws and relevant internationally agreed standards. 2) The impact of sustainability trends, risks, and opportunities on the long-term prospects and financial performance of the organization.	Our responsibility, 59-61

<b>2</b>	<b>Organizational Profile</b>	
2.1	Name of the organization.	Corporate Governance, 85 Back Cover
2.2	Primary brands, products, and/or services.	Products and service, 32, 40
2.3	Operational structure of the organization.	Corporate Governance, 86/87
2.4	Location of organization's headquarters.	Corporate Governance, 86
2.5	Number of countries where the organization operates.	Straumann in brief, 12  Corporate Governance, 86  Country Organizations, 216/217
2.6	Nature of ownership and legal form.	Corporate Governance, 85
2.7	Markets served.	Markets 21-24  Regions, 26-28  Customers, 66/67
2.8	Scale of the reporting organization, including number of employees, net sales, total capitalization, quantity of products or services provided.	Key facts and figures (inside cover)  Information for investors, 206/207
2.9	Significant changes during the reporting period regarding size, structure, or ownership.	Corporate Governance, 85,87
2.10.	Awards received in the reporting period.	Customers, 67  Letter to Shareholders, 6

<b>3</b>	<b>Report Parameters</b>	
REPORT PROFILE		
3.1	Reporting period.	Global Reporting Initiative, 219
3.2	Date of most recent previous report.	Global Reporting Initiative, 218  February 1, 2009

3.3	Reporting cycle.	Global Reporting Initiative, 219
3.4	Contact point for questions regarding the report or its contents.	Contacts, 214
<b>REPORT SCOPE AND BOUNDARY</b>		
3.5	Process for defining report content, including explanation of how the organization has applied the 'Guidance on Defining Report Content' and the associated Principles.	Global Reporting Initiative, 218/219
3.6	Boundary of the report.	Global Reporting Initiative, 219
3.7	Specific limitations on the scope or boundary of the report, if any.	Global Reporting Initiative, 219
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.	Global Reporting Initiative, 219
3.9	Data measurement techniques and the bases of calculations. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Global Reporting Initiative, 219
3.10.	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement.	Global Reporting Initiative, 219 Environmental Protection, 73
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	Global Reporting Initiative, 219
<b>GRI CONTENT INDEX</b>		
3.12	Table identifying the location of the Standard Disclosures in the report.	Global Reporting Initiative, 218 This detailed content index
<b>ASSURANCE</b>		
3.13	Policy and current practice with regard to seeking external assurance for the report.	Global Reporting Initiative, 219

<b>4</b>	<b>Governance, Commitments, and Engagement</b>	
<b>GOVERNANCE</b>		
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Corporate Governance, 91-97
4.2	Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organization's management and the reasons for this arrangement).	Corporate Governance, 91
4.3	For organizations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	Corporate Governance, 91
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Corporate Governance, 90
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organization's performance (including social and envi-	Compensation Report, 105-113

	ronmental performance).	
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Corporate Governance, 91 Compensation Report 105/106/ 113
4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organization's strategy on economic, environmental, and social topics.	Our responsibility, 60
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	Our responsibility, 59 Employees, 64 Communities, 69
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental, and social performance, including frequency with which the highest governance body assesses sustainability performance.	Our responsibility, 60
4.10.	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	Our responsibility, 60
COMMITMENTS TO EXTERNAL INITIATIVES		
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Our responsibility, 60
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses.	Our responsibility, 60 Employees, 64
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations.	Customers, 67
STAKEHOLDER ENGAGEMENT		
4.14	Stakeholder groups engaged by the organization.	Our responsibility, 59
4.15	Basis for identification and selection of stakeholders with whom to engage.	Our responsibility, 59
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Our responsibility, 59
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded.	Our responsibility, 59 Employees, 63 Customers, 66

<b>5</b>	<b>Management Approach and Performance Indicators</b>	
<b>Economic</b>		
A	Disclosure on Management Approach – Economic.	Letter to shareholders, 3-9 Straumann in brief, 12-17 Markets, 20 Our responsibility, 59 Customers, 66/67
B	Economic Performance Indicators.	
<b>ASPECT: ECONOMIC PERFORMANCE</b>		
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Financial report, 126-129, 133-134 On community investments, only partial information is available: Communities, 68/69
EC2	Financial implications and other risks and opportunities for the organization's activities due to climate change.	
EC3	Coverage of the organization's defined benefit plan obligations.	Financial Report, 141, 148-149, 162-164, 175
EC4	Significant financial assistance received from government.	Accounting policies on government grants: Financial Report, 151 No material amounts have been recognized in Straumann's financial statements.
<b>ASPECT: MARKET PRESENCE</b>		
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	Compensation Report, 105
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation.	In our hiring, we do not consider applicants' origins and do not discriminate in favour of or against members of the local community.
<b>ASPECT: INDIRECT ECONOMIC IMPACTS</b>		
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit.	
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	

<b>Environmental</b>		
A	Disclosure on Management Approach.	Our responsibility, 59-61 Environmental Protection, 70/71
B	Environmental Performance Indicators.	
<b>ASPECT: MATERIALS</b>		
EN1	Materials used by weight or volume.	Environmental Protection, 72
EN2	Percentage of materials used that are recycled input materials.	
<b>ASPECT: ENERGY</b>		
EN3	Direct energy consumption by primary energy source.	Environmental Protection, 72
EN4	Indirect energy consumption by primary source.	Environmental Protection, 72
EN5	Energy saved due to conservation and efficiency improvements.	Environmental Protection, 71/72
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	
<b>ASPECT: WATER</b>		
EN8	Total water withdrawal by source.	Environmental Protection, 72
EN9	Water sources significantly affected by withdrawal of water.	
EN10	Percentage and total volume of water recycled and reused.	
<b>ASPECT: BIODIVERSITY</b>		
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	
EN13	Habitats protected or restored.	
EN14	Strategies, current actions, and future plans for managing impacts on biodiversity.	
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations.	
<b>ASPECT: EMISSIONS, EFFLUENTS, AND WASTE</b>		
EN16	Total direct and indirect greenhouse gas emissions by weight.	Environmental Protection, 72
EN17	Other relevant indirect greenhouse gas emissions by weight.	
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	
EN19	Emissions of ozone-depleting substances by weight.	
EN20	NO <sub>x</sub> , SO <sub>x</sub> , and other significant air emissions by type and weight.	

EN21	Total water discharge by quality and destination.	
EN22	Total weight of waste by type and disposal method.	Environmental Protection, 72
EN23	Total number and volume of significant spills.	
EN24	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	
EN25	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	
<b>ASPECT: PRODUCTS AND SERVICES</b>		
EN26	Initiatives to mitigate environmental impacts of products and services and extent of impact mitigation.	
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	
<b>ASPECT: COMPLIANCE</b>		
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	
<b>ASPECT: TRANSPORT</b>		
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	
<b>ASPECT: OVERALL</b>		
EN30	Total environmental protection expenditures and investments by type.	

<b>Labor Practices and Decent Work</b>		
A	Disclosure on Management Approach	Our responsibility, 59-61 Employees, 62-64
B	Labor Practices and Decent Work Performance Indicators	
<b>ASPECT: EMPLOYMENT</b>		
LA1	Total workforce by employment type, employment contract, and region.	Employees, 62-63
LA2	Total number and rate of employee turnover by age group, gender, and region.	Employees, 65
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	
<b>ASPECT: LABOR/MANAGEMENT RELATIONS</b>		
LA4	Percentage of employees covered by collective bargaining agreements.	Employees, 63-64
LA5	Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements.	Employees, 62-63

ASPECT: OCCUPATIONAL HEALTH AND SAFETY		
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	
LA7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	Employees, 64
LA8	Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases.	
LA9	Health and safety topics covered in formal agreements with trade unions.	
ASPECT: TRAINING AND EDUCATION		
LA10	Average hours of training per year per employee by employee category.	Employees, 62
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	
LA12	Percentage of employees receiving regular performance and career development reviews.	Employees, 63
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY		
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	Employees, 63
LA14	Ratio of basic salary of men to women by employee category.	Compensation Report, 105
Human Rights		
A	Disclosure on Management Approach.	Our responsibility, 59-61 Employees, 62 Communities, 68-69
B	Human Rights Performance Indicators.	
ASPECT: INVESTMENT AND PROCUREMENT PRACTICES		
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	Communities, 69
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	
ASPECT: NON-DISCRIMINATION		
HR4	Total number of incidents of discrimination and actions taken.	Employees, 64

<b>ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING</b>		
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	Employees, 63-64
<b>ASPECT: CHILD LABOR</b>		
HR6	Operations identified as having significant risk for incidents of child labor, and measures taken to contribute to the elimination of child labor.	Communities, 69
<b>ASPECT: FORCED AND COMPULSORY LABOR</b>		
HR7	Operations identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of forced or compulsory labor.	Communities, 69
<b>ASPECT: SECURITY PRACTICES</b>		
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	
<b>ASPECT: INDIGENOUS RIGHTS</b>		
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	

<b>Society</b>		
A	Disclosure on Management Approach.	Our responsibility, 59-61 Communities, 68
B	Society Performance Indicators.	
SO1	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting.	
<b>ASPECT: CORRUPTION</b>		
SO2	Percentage and total number of business units analyzed for risks related to corruption.	Employees, 64
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Employees, 64 Communities, 69 While all employees are obliged to respect the Straumann Code of Conduct and report any violation or suspected violation, All new employees are trained in the Code's provisions as part of the 'onboarding' program.

SO4	Actions taken in response to incidents of corruption.	Our responsibility, 60 No incidents involving corruption were reported in 2009.
ASPECT: PUBLIC POLICY		
SO5	Public policy positions and participation in public policy development and lobbying.	Communities, 69
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	Communities, 69
ASPECT: ANTI-COMPETITIVE BEHAVIOR		
SO7	Total number of legal actions for anti-competitive behaviour, anti-trust, and monopoly practices and their outcomes.	Employees, 64 In the year under-review, we have not been incriminated in any legal actions for anti-competitive behaviour.
ASPECT: COMPLIANCE		
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	

<b>Product Responsibility</b>		
A	Disclosure on Management Approach.	Products and Services, 32-42 Our responsibility, 59-61
B	Product Responsibility Performance Indicators.	
ASPECT: CUSTOMER HEALTH AND SAFETY		
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	Our responsibility, 60 For all our products, health and safety impacts are continuously assessed concerning the following life cycle stages: - Development of product concept - R&D - Certification - Manufacturing and production - Storage, distribution, and supply - Use and service As we provide dental regenerative, restorative and replacement products, disposal or reuse of products is not a key issue for our fields of activities.
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Our responsibility, 60

<b>ASPECT: PRODUCT AND SERVICE LABELING</b>		
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Products and Services, 40-41 Customers, 66-67
<b>ASPECT: MARKETING COMMUNICATIONS</b>		
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.	Our responsibility, 59 Customers, 67  To our knowledge, in the year under review we have not received any public censures for non-compliance of marketing communications with regulations or voluntary codes.
<b>ASPECT: CUSTOMER PRIVACY</b>		
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	
<b>ASPECT: COMPLIANCE</b>		
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	


## B) GRI Guideline Application in the Annual Report 2009

Straumann's Annual Report 2009 integrates elements of sustainability reporting based on the guidelines disseminated by the Global Reporting Initiative (GRI). These guidelines suggest that certain information be provided not only on the overall profile of the company and its report, but also on management approach and performance indicators regarding economic, environmental, human rights, labor, society, and product responsibility issues (see [www.globalreporting.org](http://www.globalreporting.org)).

There are different application levels companies can choose for GRI reporting. These range from C-Level with only some elements of GRI sustainability reporting included to A-Level where all indicators developed by GRI are reported on.

Report Application Level		C	C+	B	B+	A	A+
Standard Disclosures	G3 Profile Disclosures OUTPUT	Report on: 1.1 2.1 - 2.10 3.1 - 3.8, 3.10 - 3.12 4.1 - 4.4, 4.14 - 4.15		Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5 - 4.13, 4.16 - 4.17		Same as requirement for Level B	
	G3 Management Approach Disclosures OUTPUT	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured
	G3 Performance Indicators & Sector Supplement Performance Indicators OUTPUT	Report on a minimum of 10 Performance Indicators, including at least one from each of: Economic, Social and Environmental.		Report on a minimum of 20 Performance Indicators, at least one from each of Economic, Environmental, Human rights, Labor, Society, Product Responsibility.		Report on each core G3 and Sector Supplement* Indicator with due regard to the Materiality Principle by either: a) reporting on the Indicator or b) explaining the reason for its omission.	
		*Sector supplement in final version					

GRI A-Level is the highest standard for sustainability reporting and challenging even for extended, dedicated sustainability reports. While this standard was not deemed practical for Straumann's integrated Annual Report, GRI guidelines were applied at B-Level in order to be as ambitious as possible in this context. The following table shows the position of this reporting in relation to the options starting with the 2002 version of the GRI guidelines to application at different levels of the newest guideline version released in October 2006, with reference to self-declaration, third party check or Application Level Check by the GRI itself.

		2002 In Accordance	C	C+	B	B+	A	A+
Mandatory	Self Declared				☑			
	Third Party Checked			Report Externally Assured	☑	Report Externally Assured		Report Externally Assured
	GRI Checked							

*High level of sustainability transparency by applying GRI at B-Level in the Straumann Annual Report 2009*

GRI has checked the application of their guidelines in the Straumann Annual Report 2009, and has confirmed that the report qualifies as Application Level B under those guidelines.

## **APPENDIX: Disclosures on Management Approaches (DMAs)**

Our management approaches to key aspects of sustainability can be found in our 2009 Annual Report in various chapters, including “Markets”, “Regions”, and “Products and Services” as well as in the topical chapters within the report section titled “Sustainability”. Below this information is explicitly summarized for the six GRI sustainability topics in separate short overviews. Relevant pages in the 2009 Straumann Annual Report are referenced in parentheses.

### **DMA Economics**

Strong economic performance is our core goal. This aspect of our operation is under the strategic control of the Board of Directors and the operational control of the Executive Board (85-97).

Central to this approach is a strong commitment to innovation, quality and service in all of the regions where we do business. Our position as a supplier of premium products and services, and a clear focus on controlling costs, have allowed us to post above market performance in the past two years, despite generally difficult global economic circumstances. We plan to maintain our position by continuing our commitment to developing new products in the replacement, restorative and regenerative dental markets, and through prompt execution of strategic goals (4-5).

### **DMA Environment**

Environmental management is carried out by local environmental officers at our research and production sites — which ensures close ties to Operations — and is overseen by the Head of Operations (60). But our environmental performance is also the responsibility of all of our employees. Each one is obligated by our Code of Conduct, to comply with all laws and internal regulations regarding environmental matters.

Even though the nature of our business does not lead to significant environmental impacts, we believe in careful management and open communication on environmental performance. We collect data regarding our environmental performance for all of our production sites (71). While some elements of resource use and emissions decreased, partly related to lower manufacturing output of implant products and partly related to efficiency measures, others increased related either to higher output of CAD/CAM crown and bridge solutions or to facility expansions that prepared us for future production increases (72). CO<sub>2</sub> emissions were reported for the first time using the distinction of direct (scope 1) and indirect (scope 2) emissions following the Greenhouse Gas Protocol methodology, and decreased slightly both in absolute terms and per capita.

We will continue to monitor our environmental impacts carefully. Our overriding goal of keeping developments in consumption and emissions in line with, or lower than, increases in production and remains unchanged.

### **DMA Labor Practices**

Operational aspects of labor practices and policies fall within the responsibilities of the Head of Corporate Human Resources, who reports to the CEO (60). On the strategic level, the Human Resources Committee of the Board of Directors reviews Straumann’s human resources policies and oversees recruitment of Executive Board Members and compensation of the Board, the Executive Management Board, and the Executive Management Group (96).

Our approach to labor practices is founded upon the principles of employee development, open dialogue and fair and attractive employment conditions. We have in place a portfolio of employee



training and education programs and are committed to the ideal of promotion from within whenever possible (62).

We monitor closely a variety of metrics related to the diversity and representation of our employees, fluctuation rates of employees, and cases of discrimination (65). We are pleased that in 2009 there were no reported cases of discrimination or alleged violations or suspected misconduct concerning any other aspects of our Code of Conduct (64).

### **DMA Human Rights**

Our approach to Human Rights is based upon our Code of Conduct, which requires the company and all of our employees to act ethically and uphold human rights at all times. Compliance with our Code of Conduct is managed by our Chief Compliance Officer (60). The code is integrated in all of our employment contracts, and all new employees are made aware of it as part of our `onboarding` program.

Our operations are not centered in parts of the world where corruption or child labor are major concerns, however we always remain vigilant for unexpected issues that may arise (69). We also plan to introduce a Code of Conduct for major suppliers in 2010, which will outline our expectations for our suppliers and others with whom we do business.

### **DMA Society**

Straumann's charitable and social engagement programs are part of our culture. They are typically managed by the teams located in each region where we do business.

Our products and services are, by their nature, designed to improve the human condition and thus benefit society. We participate in numerous programs around the world that are designed to bring oral health training, education and services to people who might not be able to afford such activities otherwise. This includes charitable programs related to ectodermal dysplasia, cleft lips and palates, and basic dental care and oral hygiene programs (68-69).

We maintain political neutrality in our sponsorship activities, and do not provide financial support or contributions in kind to politicians or political parties. Our Code of Conduct also explicitly prohibits corruption, and obligates all Straumann employees to observe all applicable laws and regulations (69).

### **DMA Product Responsibility**

Our economic success squarely depends on the quality, performance and reliability of the solutions we provide to our customers. Our approach to product responsibility includes the authority of the Corporate Product Safety Officer, who reports to the Head of Corporate Quality Management who in turn reports directly to the CEO, to call a Safety Board meeting at very short notice to initiate field safety corrective actions in the rare case of a potentially serious product safety issue (60).

We have crafted a quality policy (59-60) to ensure the long-term safety and reliability of our products, which will directly lead to customer satisfaction. Our products are thoroughly tested to the highest standards, and we comply with all applicable governmental and regulatory agencies requirements for product safety testing. This approach to product responsibility also extends to the training and education we provide to our customers to ensure the proper use of our products (54-55, 67). Our product responsibility philosophy also extends to how we advertise our products and the claims that we publicly make about our products. In the year under review, we were not involved in any judicial procedures, nor were we charged any fines for non-compliance of marketing communications with regulations or voluntary codes (67).