

Straumann Supplier Code of Conduct

(Revised January 2017)

1. Introduction

This Supplier Code reflects Straumann Group's guiding principle of "simply doing more" and seeks to extend our commitment to ethical behavior/good corporate citizenship to our relationships with suppliers and business partners 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 behavior 'build trust and our vision 'more than creating smiles – restoring confidence'. It 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

It is our expectation that this Code applies to Straumann's suppliers, including their employees, worldwide.

This Code uses principles of the following as a basis:

- Straumann's Corporate 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
- The United Nations Global Compact Principles
- The UK Modern Slavery Act 2015

2. Straumann's commitment

Straumann is committed to comply with the principles of this Code itself in addition to requesting compliance from its suppliers. The Group also commits to co-operate actively and communicate transparently with its suppliers to promote these principles. Further details on Straumann's commitment to responsible and ethical corporate behavior are specified in the Group's internal Code of Conduct.

3. Suppliers' commitment

Straumann requests its suppliers to observe the following:

Compliance with laws and regulations

In addition to the provisions of this Code, suppliers 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.

Ethical business practices

Straumann expects its suppliers to conduct their business practices ethically. Suppliers 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:* Suppliers 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 supplier, any material gifts, money, donations, hospitality or vacations etc, with the intent of benefitting the supplier.
- *Free competition:* Suppliers 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:* Suppliers' 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:* Suppliers 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:* Suppliers must cooperate fully with government investigators.

Fair and safe working conditions

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

- *Protection from discrimination and sexual harassment:* Suppliers 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:* Suppliers shall ensure that there is no child or forced labor in their organization or supply chain. Also, in line with the UK Modern Slavery Act, suppliers 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:* Suppliers 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:* Suppliers 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 work places:* Suppliers 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, suppliers 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 requests its suppliers 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 requests suppliers to comply with the provisions laid out in this Supplier Code of Conduct. This Code is made available to all suppliers in English. Straumann may ask certain suppliers to extend this Code to selected sub-suppliers.

Straumann's major suppliers, including suppliers of titanium, a key input material, are required to sign this Supplier Code periodically as written confirmation of their commitment to abide by its provisions. Suppliers are expected to abide by the provisions of this Code, as a precondition to doing business with Straumann. Straumann may monitor certain suppliers to evaluate their compliance with this Code.

5. Non compliance

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

6. Supplier signatures

Hereby I confirm that I have read and understood the content of this code and that our company agrees to act accordingly:

Company (including company stamp)
 Name (s)
 Function (s)
 Date
 Signature (s)