

Attestation for UK Modern Slavery Act. California Transparency in Supply Chain Act. Australian Modern Slavery Act and New South Wales Modern Slavery Act

Dentsply Sirona has an unwavering commitment to supporting the global effort to combat modern slavery, human trafficking and all other human rights abuses.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth) and constitutes Dentsply Sirona's Slavery and Human trafficking attestation for the 2022/2023 UK financial year and covers all Dentsply Sirona subsidiaries, although not all are subject to the above-mentioned acts. It sets out the steps Dentsply Sirona have taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business.

Dentsply Sirona and its subsidiaries will be collectively referred to as "Dentsply Sirona" within this statement. The reporting entities covered by this single joint statement are as follows:

ByteMe Aligners Limited
Dentsply IH Limited
Wellspect Limited

Dentsply Sirona's organization structure and supply chains

Headquartered in the United States of America, Dentsply Sirona holds a prominent global position in the manufacturing and supply of dental equipment and consumables. Dentsply Sirona also manufactures and supplies a comprehensive array of medical devices that help people across the globe with continence care through a wide range of products and services. Our purpose is to empower millions of customers by proudly creating innovative solutions for healthy smiles. Our vision is to transform dentistry to improve oral health standards globally. To realize this vision, we employ the principles of innovation, resilience, and exceptional service delivery all while maintaining the highest ethical standards.

In our pursuit of maintaining the highest ethical standards, we have established a cross-functional Ethics and Compliance Committee. The Ethics and Compliance Committee consists of members of our executive leadership team and other functional leaders. The committee works with our Chief Compliance Officer in support of the Compliance program to ensure that issues are identified and addressed using a risk-based approach. Under this committee's charter, our Ethics and Compliance initiatives demonstrate Dentsply Sirona's unwavering commitment to our core values which set behavioral expectations for employees, business partners and industry consultants. Ultimately, this proactive approach to managing the Company's ethics and compliance program helps ensure a sustainable future for our Company.

OUR COMPANY



Dentsply Sirona's Values and Operating Principles

At Dentsply Sirona, we have a core set of Values and Operating Principles which guide our employees globally to reach our goals using the highest ethical standards. Our Values and Operating Principles are the foundations of how we operate and employees are trained on this at onboarding and throughout their careers at DS. The culture of our organization forms the foundation of our Company. Our culture describes who we are, what we stand for, and why we do what we do every day.

Vision

We transform dentistry to improve oral health globally.

Purpose & Mission

Every day, we empower millions of customers by proudly creating innovative solutions for healthy smiles

Values

AGILE

We innovate.

We challenge ourselves constantly.

We act quickly.

ACCOUNTABLE

We hold ourselves and each other accountable.

RESPECTFUL

We listen. We foster diversity and inclusion.

We respect the communities in which we live and work.

COLLABORATIVE

We are good partners.

We learn from each other. We are one team. We have fun.

TRUSTWORTHY

Our customers can rely on us.

We can rely on each other. We empower our people.

Operating Principles

- We approach customers as ONE Company, and they are core to everything we do.
- We create innovative solutions that customers love to use.
- We think and act with positive intent and the highest integrity.
- We operate sustainably in everything we do.
- We use our size and global breadth to our advantage.



As of 31/12/2022, Dentsply Sirona has a global workforce of approximately 15,467 employees including (208 in the United Kingdom and 194 in Australia and New Zealand). Dentsply Sirona has operations in more than 40 locations worldwide and a sales presence in more than 120 countries. Dentsply Sirona provides comprehensive end-to-end solutions to dental professionals and is the world's largest manufacturer of professional dental products and technologies. Together with our partners, we empower dental professionals all over the world to provide millions of patients¹ with best-in-class dental care and deliver healthy smiles. We are on a journey to transform dentistry to improve oral health globally

¹ For our Byte division, patients are also defined as customers
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and are proud to be a preferred partner for dental practices, clinics, dental laboratories and authorized distributors worldwide.

SEGMENTS	TECHNOLOGIES & EQUIPMENT					CONSUMABLES			
	Digital Solutions	Enabling Devices	Orthodontics	Implants	Healthcare	Single Unit Crown (Indirect)	Root Canal Treatment	Digital Lab Workflow & Preventive Procedures	Class II (Direct)
WELL-ESTABLISHED BRANDS	Axeos Orthophos Sidexis 4 Schick Primescan CEREC* Primemill Omnicom inLab*	Intego Sinus Teneo SiroLaser DAC T1 Midwest* T2 Midwest* T3 Midwest* T4 Midwest*	SureSmile* byte	Astra Tech Implant System* Atlantis* Simplant* PrimeTaper OSSIX MIS	Wellspect <i>LoFric</i> <i>Navina</i>	Aquasil Ultra+ Smart Wetting Impression Material CEREC tessera CEREC Zirconia+ Calibra Cements	ProTaper Ultimate WaveOne* Gold AH Plus* VDW	Cavitron* Cavitron* Slimline* Nupro* Portrait IPN Denture Teeth Cercon Zirconia Lucitone Print	Palodent* Plus Sectional Matrix System Palodent 360 TPH Spectra ST Universal Composite Restorative SmartLite Pro Surefil one

Our global supply chain includes manufacturers of raw materials and components which are used in the production of over 4,500 brands sold through distributors and directly via Dentsply Sirona sales staff to medical professionals and institutions around the world. Our product supply chains are extensive and global, with suppliers in more than 80 countries. The majority of our suppliers are long-term relationships and are based in Germany, Italy and the United States of America. The main types of raw materials and components that are used in the production of our products are plastic parts, metal parts and electronics. We source from 5060 direct suppliers globally, with 72% of spending focused on the top 250. Our top 250 suppliers are primarily focused in Germany, Italy, Sweden and the United States of America.

Our policies on slavery and human trafficking

Dentsply Sirona is fully committed to supporting global efforts to address the issues of modern slavery and human trafficking. We actively pursue this commitment through our internal policies as well as through direct actions with our business partners throughout our supply chain. We stringently expect all our employees and business partners to fully comply with the California Transparency in Supply Chain Act of 2010, the UK Modern Slavery Act of 2015 and Australian Modern Slavery requirements including the New South Wales Modern Slavery Act of 2018. To this end, we have included human rights issues such as human trafficking in our major global policies which all staff are trained on a two-year cycle. Furthermore, we are in the advanced stages of crafting distinct policies addressing human rights issues. Upon completion, these policies will be disseminated to our staff through our online learning management system, further reinforced by on-site training conducted by skilled compliance professionals.

[Dentsply Sirona's Code of Ethics and Business Conduct](#) (the Code), encapsulates our identity, values, and the critical role we each play in ensuring compliance with all pertinent laws. It underscores the importance of unflinching integrity in all our interactions with healthcare professionals, distributors, suppliers, consultants, and government officials and agencies.

The Code sets out guiding principles for conducting business that must be followed by everyone who does business for the benefit of or on behalf of Dentsply Sirona, and establishes the expectations for how we operate globally. It outlines expectations for uncompromising integrity and compliance with all laws and regulations when it comes to customer, supplier, key opinion leader and government official interactions. It also provides guidance on identifying, mitigating and managing a wide range of risks, and underscores our commitment to our employees and communities around the world. Supervisors and managers are responsible for ensuring their teams comply with the Code, and all employees are responsible for ensuring they are able to recognize potential compliance issues and to seek the appropriate advice from subject matter experts regarding any issues. The Code is reviewed annually by the Ethics and Compliance Committee as well as the Board,

The Code outlines the expectation that all our employees work and act to the highest ethical standards. Training on the Code is compulsory for all new employees at onboarding, as well as biennially for all existing employees, reiterating the expectation for all our staff to adhere to the highest ethical standards.

[Dentsply Sirona's Business Partner Code of Conduct](#) articulates our core values and the expectations we have for our third-party business partners in every business relationship we engage in worldwide. The Business Partner Code of Conduct is available in 21 languages and is promoted through business meetings as well as being available on our website. Starting in 2023, we will require all business partners in our supply chain to attest to compliance with our Business Partner Code of Conduct. We look at compliance with all applicable laws worldwide as just a starting point for ethical business behavior and hold ourselves and our business partners to the highest standards in terms of promoting basic human rights and dignity and to be good corporate citizens and good neighbors in the communities in which we work and live.

Whistleblower Hotline System - At Dentsply Sirona we emphasize that all staff should feel confident enough to speak up should they witness possible breaches of our Code of Ethics and Business Conduct, potential breaches of country or international law or an incident of unethical behavior or business practices. Management are encouraged to make themselves available for such talks and are asked to regularly remind staff that 'if you see something, say something'.

We have established a whistleblower hotline system administered by a third-party service provider which enables our employees, business partners and external parties to report any perceived unethical behavior or wrongdoing anonymously (where permitted by law) or by leaving contact details. The hotline system is accessible online or by phone. We have a separate toll-free hotline number for each of the locations in which we have a physical office presence and is available in all languages we do business in. All reports made via the website or hotline numbers are sent to our Chief Compliance Officer, General Counsel and the head of the Audit and Finance Committee on the Board of Directors. Each report is then reviewed and sent on to the appropriate member of the Ethics & Compliance team to manage and action. If it is determined that an investigation is required, resources will be allocated as necessary.

All Dentsply Sirona staff are encouraged to use the whistleblower hotline and are reminded through annual online and on-site training as well as each of our office locations having whistleblower hotline posters displayed in positions with the highest footfall. Our Whistleblower Hotline System Policy is also freely available and accessible to all staff on the Dentsply Sirona SharePoint Intranet.

Dentsply Sirona is devoted to creating a safe and supportive environment for our employees to report issues without apprehension. In support of this, we have implemented a 'No Retaliation Policy.' This policy prevents any form of disciplinary action against individuals named or involved in a potential report until the conclusion of a thorough investigation. This approach is designed to mitigate concerns employees might have about reporting issues, specifically fears of potential disciplinary actions from superiors upon learning that an investigation is underway.

Third-Party Supplier Conduct Agreement

Dentsply Sirona communicates our human rights expectations to our suppliers through the use of contractual provisions.

All suppliers are required to comply with our Third-Party Supplier Conduct Agreement. This agreement defines our expectations for each supplier we work with globally and covers a wide range of subjects such as audit rights, compliance with applicable local and international laws, anti-bribery, anti-corruption, sub-contractors and fighting various human rights issues such as human trafficking, modern slavery and conflict minerals.

All suppliers must agree to the contents of our Third-Party Supplier Conduct Agreement prior to commencing business. By agreeing to this agreement, our suppliers are self-certifying that they will comply with all relevant local and international laws, the provisions of the Dentsply Sirona Business Code of Conduct and Ethics as well as our Business Partner Code of Conduct and will cooperate with requests related to compliance to Human Trafficking and Modern Slavery laws including on-site audits if requested.

Training

As part of our commitment to ensuring the integrity and ethics of our operations, Dentsply Sirona takes responsibility for the conduct of its employees worldwide, recognizing each individual as a representative of our company values. To this end, we ensure that all our staff across all global entities are comprehensively trained on our Code of Ethics and Business Conduct as part of the onboarding process, with refresher courses taking place annually.

In addition to the Code of Ethics, we utilise a variety of methods, such as digital learning modules and on-site presentations, to provide training on our suite of policies. This training is orchestrated by our Ethics and Compliance Department to ensure a consistent and comprehensive approach

In alignment with our unwavering commitment to maintain and elevate ethical standards, in late 2022 our organization has taken steps to enhance our Code of Ethics and Business Conduct. This expansion now emphatically highlights pertinent human rights issues, including the persistent global concern of modern slavery, to bolster our stance against

such exploitative practices. Furthermore, we acknowledge the importance of educating our employees about these matters and have accordingly improved our training modules. They have been transformed into more interactive, engaging formats that will effectively equip our team members with the knowledge and resources to identify, report, and combat unethical activities, thereby fostering a corporate culture where respect for human rights is deeply embedded.

Furthermore, we extend this commitment to high ethical standards to our procurement process, diligently training all staff involved in procurement as well as our finance teams and business leaders in our thorough due diligence procedures. These measures, we believe, equip our staff with the knowledge and tools needed to identify and address potential risks of modern slavery in our business and supply chains.

Assessing Modern Slavery Risk

In our assessment of potential modern slavery risks within our operations, we have adopted a comprehensive and collaborative approach. We have sought the expertise of external partners and enlisted the guidance of proficient legal counsel to ensure the robustness of our evaluation. Additionally, we have facilitated enriching dialogues with our industry peers to glean insight from their experiences and strategies. A crucial part of our risk assessment process also involves regularly consulting authoritative external sources. These include the collaborative global partnership Alliance 8.7, the UK's Annual Modern Slavery Report, and the US Department of Labor's List of Products Produced by Forced or Indentured Child Labor. These diverse channels of information allow us to gain a holistic understanding of the issue, enhancing our ability to proactively address and eliminate any form of modern slavery in our operations.

Dentsply Sirona's largest exposure to modern slavery risks is through the use of third parties, particularly in the service industry. As a result, when engaging with service providers in the cleaning, catering and transportation industries, through our due diligence process, we ensure we are using reputable providers with no history of any negative human rights or ethical issues. In response to the findings of our modern slavery risk assessments, we have strategically structured our supply chains to minimize engagements with suppliers from countries where modern slavery has been known to be an issue, for example we currently only utilize four direct suppliers in Russia and two in Pakistan. We have taken steps to eliminate business interactions with suppliers based in countries that relevant international organizations have labeled as having a high prevalence of modern slavery in order to eradicate the potential risk. To that end, Dentsply Sirona does not have any suppliers based in North Korea, Eritrea, Libya, Iran, Equatorial Guinea, Burundi, Democratic Republic of the Congo, Congo, Somalia, Central African Republic, Afghanistan or South Sudan, underscoring our commitment to a supply chain free of modern slavery.

In light of the heightened risk of encountering modern slavery in the supply chain when associating with suppliers from countries where it is a known issue, Dentsply Sirona predominantly sources its supplies from nations renowned for their stringent measures to combat modern slavery. These countries include Australia, the Netherlands, Sweden, the UK, and the US. Demonstrating our proactive stance, over 28% of our suppliers are based in these five countries alone, which further underscores our commitment to ethical sourcing and the global fight against modern slavery.

Dentsply Sirona has identified that some materials required to produce certain Dentsply Sirona products are considered higher risk for modern slavery such as rubber and cobalt. For these two materials we exclusively use suppliers from countries with a strong history of combating modern slavery such as Denmark, Germany, Switzerland, the US and the UK. Electronics is another category of component considered high-risk which we use in our equipment, therefore we have maneuvered our supply chain in such a way to ensure that the vast majority of our electronics suppliers are based in Germany.

Due diligence processes

Our initiatives to mitigate the risk of human rights abuses within our supply chain constitute one aspect of our broader goal to exclusively engage with third-parties of high ethical standards and demonstrate a clean record devoid of any nefarious activities. In order to realize this objective, we have established a rigorous due diligence process. This process is designed to scrutinize every prospective supplier, thereby ensuring that Dentsply Sirona engages only with business partners who meet and adhere to the high business and ethical standards we demand.

Prior to any formal engagement, potential suppliers are put through our online due diligence portal to confirm their credibility and ethical standing. Our due diligence and onboarding process utilizes a risk-based approach to identify areas in our supply chain with the highest risk of human rights violations and which require greater focus to mitigate the risk that human rights violations such as human trafficking and use of conflict mineral are occurring. The process was created with help from an external service provider which specializes in third-party risk and due diligence solutions.

Once a supplier has been added to our due diligence portal, a copy of our business partner code of conduct, a due

diligence questionnaire and a training deck are automatically sent to their contact email address. The questionnaire requires the potential supplier to answer questions on topics ranging from company structure and industry, if they source any materials from known human rights hotspots and sustainable procurement, to their commitments and actions fighting human rights abuses. The answers given to this questionnaire are considered when the Ethics and Compliance department makes the decision to approve or reject the business engagement.

The training deck which is sent out to all potential suppliers covers a range of topics including human rights and modern slavery, anti-bribery and anti-corruption, trade sanctions, conflicts of interest and it also covers use of our whistleblower hotline system. All potential suppliers are required to read the training and certify that they have understood the contents. This is also checked prior to approval or rejection by the Ethics and Compliance department.

Potential suppliers are then screened against a wide selection of sanctions lists and watch lists, those which are deemed to be higher risk – based on industry or location – are also subject to adverse media searches in English and the language local to the supplier. All due diligence checks are conducted by our independent due diligence provider. This due diligence process enables Dentsply Sirona to identify any human rights risks or issues prior to engagement.

Once the due diligence report, the supplier questionnaire and training deck have been completed and a copy of the signed Third-Party Supplier Conduct Agreement has been uploaded to the online portal, the Ethics and Compliance department will review and decide to approve or reject.

Once approved, all of our third-parties are screened daily against the same level of due diligence that they were screened against at the onboarding stage and if an alert were to subsequently be found after on-boarding, it will be assessed and dealt with by the Ethics and Compliance team.

If there are any issues found during the initial due diligence reporting phase, the alert will go through remediation by our due diligence provider to ensure that the alert is confirmed to be related to the potential third-party partner which we are screening. If the alerts remain then they are assessed on a case by case basis by the Ethics and Compliance team and the local business.

Suppliers will certify in our Third-Party Supplier Conduct Agreement that they understand and will comply with Dentsply Sirona's Code of Ethics and Business Conduct as well as the Business Partner Code of Conduct.

To date our risk mitigation efforts have proven successful as we have had no instances of slavery or human trafficking noted in any Dentsply Sirona business.

In our continuous pursuit of supply chain transparency during 2022, we collaborated with numerous third-party supply chain mapping providers. After a thorough evaluation process, we selected a provider that best aligned with our objectives. We are now diligently working towards achieving comprehensive mapping of our second and third-tier suppliers, aiming to eradicate all potential avenues of unethical practices, including modern slavery and forced labor, within our supply chain. This initiative underscores our commitment to ensuring an ethical and humane supply chain at all levels. Our new supply chain mapping system is slated to be fully operational during 2023 and will be integrated into our standard operating procedures (SOPs) for all onboarding processes. This reflects our proactive approach to ensure that our ethical standards are deeply embedded in every aspect of our operations from the outset.

Measuring effectiveness

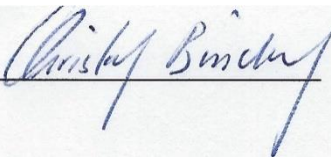
As all of our due diligence reports and third-party onboarding information is created and stored online, we are instantly alerted, via email, to any new issues found that are linked to one of our potential third-party partners or current suppliers. Once the Ethics and Compliance team is informed of a new alert related to a supplier, they will work to remediate this issue as a matter of priority. We also receive regular reports from our due diligence provider highlighting any new alerts received for the previous month to ensure nothing is missed.

At Dentsply Sirona we are committed to being a pillar of Ethics and Compliance in the dental and medical device industry and are constantly aiming to improve our programs and processes. Over the past year, we have made numerous changes to streamline our due diligence procedures. We will continue to work towards increasing staff and business partner awareness of Dentsply Sirona's commitment to preventing human rights abuses within our supply chain.

External counsel, in conjunction with the Ethics and Compliance team at Dentsply Sirona have reviewed our program from a risk-based perspective to assure we focus on the critical risk areas to maximize the program's effectiveness. We are committed to continuous improvement and will be strengthening our supplier contracts and self-certifications as well as building upon our current policies and processes.

This statement has been approved by the Dentsply Sirona Board of Directors on 31/05/2023.

Signed:

Name: 

Position: Vice President and General Manager, UK + I




Brian O'Reilly
Chief Compliance Officer