

**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 is committed to supporting the global effort to combat slavery and human trafficking.

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 2021 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.

Within this statement, “Dentsply Sirona” refers to the below business entities:

- ByteMe Aligners Limited
- Dentsply IH limited
- Wellspect Limited

**Dentsply Sirona’s organization structure and supply chains**

Dentsply Sirona is a global leader in the manufacturing and supply of dental equipment and consumables headquartered in the United States of America. Dentsply Sirona also manufactures and supplies medical devices that help people 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 globally.

Our cross-functional 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.



We have approximately 15,000 employees, 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 patients<sup>1</sup> with best-in-class dental care and deliver healthy smiles. We are on a journey to transform dentistry to improve oral health globally 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 Omicam inLab®	Intego Sinus Teneo SiroLaser DAC T1 Midwest® T2 Midwest® T3 Midwest® T4 Midwest®	SureSmile®  <b>byte</b> ®	Astra Tech Implant System®  Atlantis® Simplant® PrimeTaper OSSIX® MIS	Wellspect®  LoFric®  Navina®	Aquasil Ultra+ Smart Wetting Impression Material  CEREC tessera  CEREC Zirconia+  Calibra Cements	ProTaper Ultimate  WaveOne® Gold  AH Plus®  VDW®	Cavitron® Cavitron® Simline® 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

<sup>1</sup> For our Byte division, patients are also defined as customers  
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plastic parts, metal parts and electronics. We have over 3690 direct suppliers, with 56% spent with the top 250.

### **Our policies on slavery and human trafficking**

Dentsply Sirona supports global efforts to address the issues of modern 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, 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. We are also in the process of creating standalone policies centered around human rights issues which, once completed, will be assigned to staff via our online learning management system and will be supplemented by on-site training conducted by trained compliance professionals.

[Dentsply Sirona's Code of Ethics and Business Conduct](#) (the Code), defines who we are as a company in terms of our values, the role each of us play in assuring compliance to all applicable laws and the importance of acting with integrity in every engagement with health care professionals, distributors, suppliers, consultants, and government agencies.

The Code sets out guiding principles for the conduct of business that must be followed by everyone who does business 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.

[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. 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 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 automatically sent to our Chief Compliance Officer and reviewed with the Ethics and Compliance Committee. 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 prominent positions. Our Whistleblower Hotline System Policy is also freely available on the Dentsply Sirona SharePoint Intranet.

At Dentsply Sirona we try to make our staff feel as comfortable as possible when reporting an issue and to that end have established a 'No Retaliation Policy' whereby all disciplinary action is restricted for any parties mentioned or associated with a potential report until an investigation has been completed. This is in order to minimize the possibility that staff may not report an issue for fear that their superior could potentially discipline them upon discovery that an investigation is being conducted.

## **Third-Party Supplier Conduct Agreement**

Dentsply Sirona communicates our human rights expectations to our suppliers through the use of training material, business meetings and 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 and modern slavery.

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 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 every Dentsply Sirona employee globally is an ambassador for the company, all staff in all Dentsply Sirona entities worldwide are given training on our Code of Ethics and Business Conduct at onboarding and biennially, they are also trained on our other policies via online learning modules and on-site presentations conducted by our Ethics and Compliance Department. In 2021 our Code of Ethics and Business Conduct training was completed by 97%.

All staff involved in the procurement process, as well as Ethics and Compliance, finance staff and business leaders are trained on our due diligence processes.

## **Assessing Modern Slavery Risk**

When assessing the risks of modern slavery in our operations we have consulted external partners and legal counsel, discussed the issue with industry peers as well as regularly referred to external sources such as Alliance8.7, the UK's Annual Modern Slavery Report and the US Department of Labor's List of Products Produced by Forced or Indentured Child Labor.

Our largest exposure to modern slavery risks are 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 we ensure we are using reputable providers with no history of any negative human rights issues. Following the results of our modern slavery risk assessments, we have maneuvered our supply chains to use a very limited number of suppliers from countries where modern slavery has been known to be an issue, for example we currently only utilize six direct suppliers in Russia and two in Pakistan. We have decided to eliminate interactions with suppliers based in countries that 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.

Due to the increased likelihood of encountering modern slavery in the supply chain when using suppliers based in countries where modern slavery is a risk, Dentsply Sirona primarily purchases from countries which are known to be taking stronger actions to combat modern slavery such as the Netherlands, Sweden, the UK and the US, with over 900 of our suppliers coming from these four countries alone.

We previously 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 that the vast majority of our electronics suppliers are based in Germany.

## **Due diligence processes**

Our efforts to mitigate the risks of human rights violations in our supply chain is one part of our overall aim to only work with third-parties of high ethical standing and no history of nefarious activity. As a result, we have established a due diligence process designed to screen all potential suppliers to ensure Dentsply Sirona only works with business

partners which work to the high business and ethical standards we require.

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.

Each third-party is given a risk rating based on different factors such as location and industry. This rating is then used to determine what level of due diligence reporting is conducted.

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 it's 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.

If a red flag or alert found during due diligence is substantiated and the supplier is unable to provide appropriate mitigation to the issue, then we will terminate the onboarding and the business engagement will not commence.

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.

### **Measuring effectiveness**

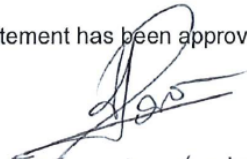
As all of our due diligence reports and third-party onboarding information is created and stored online, we are instantly alerted, via email, to any new issues found that are linked to one of our potential third-party partners or current suppliers. Once the Ethics and Compliance team is informed of a 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 31/05/2022.


Signed:



Name:

FRANCOIS LOISEAN

Position: Vice President and General Manager, UK + I



Brian O'Reilly  
Chief Compliance Officer