



Policy Statement on Respect for  
Human Rights and the Environment of  
Sirona Dental Services GmbH,  
SIRONA Dental Systems GmbH and of  
Dentsply Sirona Deutschland GmbH

# CONTENTS

Foreword	<a href="#"><u>3</u></a>
Who we are	<a href="#"><u>4</u></a>
What we stand for	<a href="#"><u>5</u></a>
What we are guided by	<a href="#"><u>6</u></a>
The standards we set for ourselves and our partners	<a href="#"><u>7</u></a>
What we demand of ourselves and our partners	<a href="#"><u>8</u></a>
How we identify, monitor and limit risks	<a href="#"><u>9</u></a>
Further information	<a href="#"><u>11</u></a>
Final formula	<a href="#"><u>12</u></a>

# FOREWORD

On 1 January 2023, the Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (Lieferkettensorgfaltspflichtengesetz- hereinafter the "LkSG") came into force in Germany. With this policy statement on human rights strategy, we the German companies of Dentsply Sirona Group that are subject to the LkSG, set out the standards, principles, and procedures by which we fulfil our responsibility to act in an ethically impeccable conduct.

Dentsply Sirona Group (hereinafter also "Dentsply Sirona") is the world's largest manufacturer of professional dental products and technologies. As part of the global Dentsply Sirona Group, we are aware of our responsibilities. This responsibility goes hand in hand with our mission to help people achieve a healthy smile and forms the foundation of our corporate principles. We are committed to implementing our human rights due diligence in our own processes and in our collaboration with business partners.

We act in accordance with international standards and have established policies and catalogs of measures that go beyond the protection of human rights. Thus, internal company initiatives have been launched within Dentsply Sirona Group to promote inclusion, equality, and diversity.

With this in mind, Dentsply Sirona pursues its [sustainability strategy](#) "BEYOND: Taking action for a brighter world". It is based on the three pillars of Healthy Planet, Healthy Smiles and Healthy Business and is an integral part of the vision to transform dentistry and improve oral health worldwide. Dentsply Sirona is committed to ensuring its leading role in the industry to drive change.

When it comes to anchoring the protection of human rights and the environment and ensuring this in our activities, we are all called upon to recognize this as an integral part of our business decisions.

We are committed to this.



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## WHO WE ARE

We are the German companies of Dentsply Sirona Group that are subject to the LkSG. Dentsply Sirona is the world's largest manufacturer of high-quality dental products and technologies for dentists and dental technicians. Together with its business partners, Dentsply Sirona enables dentists and dental technicians around the world to provide millions of patients with top-notch dental care - for a healthy smile. Dentsply Sirona is committed to transforming dentistry to improve oral health worldwide and is proud to be the preferred partner of numerous dental practices, clinics, dental laboratories, and authorized distributors around the world.

At Dentsply Sirona, more than 15,000 people worldwide work on innovative solutions that contribute to improving dentistry and oral health.

Dentsply Sirona's product portfolio comprises strong brands and numerous technologies, which are worked on every day in five globally organized business units.

- Essential Dental Solutions
- Connected Technology Solutions
- Orthodontic Aligner Solutions
- Implant & Prosthetic Solutions
- Wellspect HealthCare

The products of Dentsply Sirona are used in more than 150 countries worldwide. Dentsply Sirona also offers a comprehensive range of other services: Since 2019, for example, Dentsply Sirona has been able to look back on around 1.95 million registrations for specialist dental training and continuing education courses.



## WHAT WE STAND FOR

Dentsply Sirona's mission and vision is to shape dentistry and improve oral health worldwide. The culture of Dentsply Sirona, including its German legal entities that are subject to the LkSG is shaped by its vision, corporate values, and business principles.

Our actions are guided by our mission statement, which is based on five values:

- **Agility** – We create innovations, constantly challenge ourselves and act quickly.
- **Responsibility** – We hold ourselves and each other accountable.
- **Respect** – We listen, promote diversity and inclusion, and respect the environment in which we live and work.
- **Cooperation** – We are trustworthy partners, learn from each other, are ONE team and have fun.
- **Trust** – Our customers can rely on us, and we can rely on each other.

The responsibility we bear as a company towards the environment and people is expressed in our [sustainability strategy](#) “BEYOND: Taking Action for a Brighter World”.

In this context, we view Dentsply Sirona's commitment since September 2021 and the five-year collaboration with “Smile Train”, the world's largest cleft-focused organization, as a further commitment to human rights. Dentsply Sirona has decided to donate 5 million US\$ to Smile Train over the course of the partnership.

We, the German companies of Dentsply Sirona that are subject to the LkSG, attach great importance to acting responsibly in our business activities and in our dealings with business partners, including those involved in the supply chain, long before the LkSG came into effect.

We are committed to meeting the obligations under the LkSG and to adequately protecting human rights and the environment.

Furthermore, we work towards creating awareness and understanding among all stakeholders of the importance of human rights in the context of all our business activities. This applies both inside and outside our company.

# WHAT WE ARE GUIDED BY

We base our business activities and our process steps along the supply chain on uniform standards that apply to our employees and our business partners.

Our approach is based on the framework of the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and specifically the United Nations International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

We expect our employees and business partners to comply with applicable laws such as the LkSG, the EU Conflict Minerals Regulation, the California Transparency in Supply Chain Act, the UK Modern Slavery Act, the Australian Modern Slavery Act, the New South Wales Modern Slavery Act, the Uyghur Forced Labor Prevention Act, and the conflict minerals provisions of the US Dodd-Frank Act.

We have aligned our sustainability strategy to the United Nation's Sustainable Development Goals ("UN SDGs") so we can be part of the collaborative action to create a more prosperous, inclusive, sustainable, and resilient world.





## THE STANDARDS WE SET FOR OURSELVES AND OUR PARTNERS

Dentsply Sirona supports global efforts to combat exploitation, slavery, and human trafficking. These principles are embedded within the company through internal policies and direct measures with our business partners along the supply chain. They are also an integral part of the Dentsply Sirona Code of Ethics and Business Conduct and the Dentsply Sirona Business Partner Code of Conduct. Both codes are publicly accessible on the Dentsply Sirona website.

The Dentsply Sirona Code of Ethics and Business Conduct is the binding basis for all Dentsply Sirona activities. It covers the activities and areas relevant to the company and is intended to ensure that everyone involved is guided by common standards, values, and principles of action. The Dentsply Sirona Code of Ethics and Business Conduct\* requires Dentsply Sirona employees to base their decisions and actions on the applicable ethical rules.

Central guidelines and corresponding codes of conduct also apply to our business partners, including suppliers, distribution partners and consultants. New suppliers are made aware of these principles as part of our general terms and conditions of purchase and are required to comply with these principles.

In addition to our values, which largely determine the identity of Dentsply Sirona, the Dentsply Sirona Code of Ethics and Business Conduct defines further fundamental principles that guide us.

Both standards, internal and external, go hand in hand and provide a clear framework for action and orientation.

\* Employees in Germany are subject to the respective applicable version of the Dentsply Sirona Code of Ethics and Business Conduct.



## WHAT WE DEMAND OF OURSELVES AND OUR PARTNERS

We are aware that every business activity entails human rights and environmental risks, and we accept the responsibility that arises from them. This responsibility includes adhering to due diligence obligations and acting appropriately.

We therefore require our business partners to uphold and respect human rights. Suppliers must make a binding declaration to us that they comply with human rights and environmental protection standards.

This commitment is made as part of the structured onboarding process that all suppliers must undergo before entering into agreements with us. As part of this process, potential suppliers are made aware of the relevant standards and codes.

We use a global approach, formal and internal policies, and measures to monitor our business partners' compliance with human rights along the supply chain.

Ensuring the following points is a particular focus for us:

- Compliance with laws in the context of import/export
- Compliance with anti-corruption and anti-bribery laws and respect for ethical behavior
- Exclusion of child and forced labor in all its forms
- Equal rights and equal opportunities for all people regardless of national or ethnic origin, social background, health condition, disability, sexual orientation, age, gender identity, political opinion, religion, or belief
- Protecting health, occupational safety and ensuring the dignity of every employee
- Fair working conditions, including compliance with applicable laws on wages, working hours, overtime, rest periods, vacations, and social benefits, as well as respect for workers' rights
- Environmental rights: Protection from harmful changes to the land, water or air pollution, harmful noise emissions, excessive water consumption and land confiscation and forced eviction and forced evictions, ban on mercury and POPs, and import/export of hazardous waste





## HOW WE IDENTIFY, MONITOR AND LIMIT RISKS

To implement an effective risk management system regarding potential human rights and environmental risks conducting a regular risk analysis is an essential factor. It serves to identify, weight, and prioritize risks. The risk analysis carried out with regard to the provisions of the LkSG covers two areas: Our own business area and that of our suppliers.

### **Analysis of human rights and environmental risks in own business area**

The assessment process for determining human rights and environmental risks in our own business area is carried out annually as part of the company-wide corporate risk management process. Environment, Health, and Safety aspects reviews are conducted at least twice per year.

## Analysis of human rights and environmental risks at suppliers

Dentsply Sirona undertakes regular risk assessment and monitoring in the area of direct suppliers to ensure that business partners meet expectations regarding human rights and environmental protection. This review is conducted by the purchasing department. Dentsply Sirona has commissioned an independent third party to carry out an abstract and concrete risk assessment of suppliers.

### Methodology

For the abstract risk assessment, the external service provider uses a tool to prioritize country and industry risks, which summarizes data from various data sources on global human rights and environmental risks. Here, suppliers are divided into different risk groups ("low", "medium" or "high"). For suppliers in the "medium" or "high" risk groups, a more specific risk assessment is carried out, considering existing media reports on possible violations of human rights and/or environmental concerns. An extended screening tool with more than 2 million data sources in 18 languages from around 180 countries is used for this purpose. In addition, self-disclosure is obtained from the suppliers concerned. This is done by answering a risk assessment questionnaire.

The self-disclosure flows into a final evaluation and further development of measures.

Identified risks are weighted and prioritized according to the following appropriateness criteria:

- Nature and scope of the suppliers' activities
- Dentsply Sirona's ability to influence the direct perpetrator of the hazard or violation
- Severity and probability of occurrence of the risk
- Dentsply Sirona's contribution to the risk or resulting damages

If necessary corrective measures are introduced, these are always aimed at tracking progress and taking any additional measures that may be necessary.

### Human rights and the environment in focus

Beginning in fiscal year 2023, we have carried out a risk analysis in accordance with the methodology described above. As part of our risk analysis, no specific risks were identified for our own business area. Regarding the supply chain, we see abstract, primarily country-specific risks related to occupational health and safety and environmental requirements. Effective preventive measures ensure that risks do not materialize.

# FURTHER INFORMATION

## Reporting and complaints procedure

We have established procedures for reporting violations of applicable laws and our standards in cases of suspicion (Whistleblower Hotline System). The Compliance and Legal departments have developed the Whistleblower Hotline System in coordination with the Human Resources department, and the Compliance Committee has approved it.

Anyone can access the Whistleblower Hotline System via a toll-free number or directly via a web portal, including employees of the company, communities in the vicinity of the company's sites, employees of suppliers, external interest groups such as NGOs, and trade unions. When a person submits a complaint through the Whistleblower Hotline System, they can remain anonymous if they wish. In the event that the complaint is not made anonymously, all measures will be taken to protect the identity of the person. Dentsply Sirona has also defined responsible persons who always fulfill their obligation of confidentiality.

In addition, it is stipulated in the Code of Ethics and Business Conduct, as well as in the Investigation and Case Resolution Protocol, that no form of retaliation will be tolerated against an individual who reports a complaint through the Whistleblower Hotline System. This is communicated through appropriate training sessions.

## Documentation and implementation

In our Annual Report, we communicate and report on our commitments, activities, and statements regarding human rights in accordance with this Policy statement on human rights strategy. We review progress in the implementation of this Policy statement in our business activities.

The company-wide risk assessment is carried out annually. It is designed in such a way that all relevant functions of Dentsply Sirona are not only included in an assessment of potential risks but are also examined regarding potential new risks. If this is the case, it is ensured that these are dealt with appropriately.

In addition, we appointed a Risk Surveillance Manager as Human Rights Officer in 2023 to monitor risk management in accordance with the LkSG. Our Management Board is informed annually about the work of the Human Rights Officer and the results of the risk management report.

## Training and awareness-raising

Annual training sessions on the Dentsply Sirona Code of Ethics and Business Conduct are held for all employees.

# FINAL FORMULA

As part of our culture of continuous improvement, we regularly evaluate and review how we can best optimize and strengthen our approach to human rights within our sphere of influence. The Policy Statement on Human Rights Strategy was adopted in May 2024 and the signatory information was updated in November 2024.



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