



# CODE OF BUSINESS CONDUCT 2020

## INTRODUCTION

Through the continuous improvement of its services, CANDULOR strives to sustainably increase the value for its patients, customers, partners, employees, shareholders and the society. We know that we may only achieve this goal if success is based on ethical, righteous and impeccable business conduct. Essential therefore is a commendable management as well as employees working on highest level of integrity and correct conduct, who consistently align their actions with basic ethical values and legal framework.

The CANDULOR Code of Business Conduct sets the standard for the way in which we deal with stakeholders inside and outside of the company. The managers and the employees are equally responsible for abiding by the provisions of this Code.

Our corporate values as well as the way in which we achieve our corporate objectives are just as important as the achievement of the objectives themselves.

Claudia Schenkel-Thiel

Managing Director



## 1. RELATIONS AMONG OTHERS

We create a favourable working environment by treating each other with respect, dignity and professionalism. At CANDULOR, people are hired and promoted on the basis of their skills and achievements.

We do not tolerate any kind of bullying, harassment or discrimination based on race or ethnic origin, skin colour, language, gender, age, sexual orientation, religion or permitted beliefs.

## 2. INTERACTION WITH BUSINESS PARTNERS

We attach great importance to the development of our business relations. However, these relationships can never be more important than our ethical principles, which commit us to honesty, integrity and adherence to the legal requirements.

We select our business partners solely on the basis of objective and business-related criteria. We make sure that our business partners share our rules of conduct regarding business behaviour and ethics.

We do not give or accept any business courtesies that could influence business decisions. We do not tolerate bribery and have established clear rules against corruption. Donations and other benefits must also be transparent. Under no circumstances may they be made dependent on the purchase of our products or used to achieve a direct business advantage.



### 3. DEALING WITH PUBLIC OFFICIALS

#### POLITICALLY EXPOSED PERSONS/PARTIES

It should be noted that the law is extremely strict on possible criminal liability when dealing with public officials, and that a higher standard must regularly be applied to benefits paid to such persons. We therefore do not make any payments or provide any monetary benefits to public officials, politically exposed persons or political parties. Payments to officials or representatives of public authorities to expedite official procedures are strictly prohibited.

### 4. BEHAVIOUR TOWARDS COMPETITORS

We act fairly in our conduct with our competitors. We do not participate in unfair competitive behaviour such as unlawful agreements on prices and product characteristics or the abuse of a dominant market position.

### 5. GENERAL BUSINESS CONDUCT

#### 5.1. Adherence to legal requirements

We are committed to abiding by the laws, regulations and guidelines. We expect our employees to be aware of and comply with the legal requirements in connection with their work.

#### 5.2. Quality

Our business success in the market depends on high-quality products which meet the expectations of our customers. Our employees contribute to our success by taking responsibility for the quality of their work and for continuously improving it. The managers are responsible for demanding and implementing quality.



### 5.3. Financial integrity

Through careful, complete and punctual documentation of business transactions, we ensure that the accounts are kept in accordance with reporting standards and truthfully reflect the results of business activities. CANDULOR supports the fight against money laundering, corruption and fiscal offences. If there is some doubt about the legitimacy of certain financial transactions, in particular cash transfers, the financial department in charge must be notified.

### 5.4. Protection of business secrets and intellectual property

Company and business secrets must be treated confidentially and protected. This also applies to other information that CANDULOR, contract partners and customers have an interest in keeping confidential.

### 5.5. Protection of personal data

The protection of privacy when processing personal data is a serious concern for us and is taken into account in our business processes.

### 5.6. Handling of company assets

We protect company assets by carefully handling company property, intellectual property rights and company information in order to avoid loss, theft or damage. The equipment and information systems of CANDULOR are intended for business use. Moderate private use is only permissible if it does not violate the company's interests.

### 5.7. Communication and media

We provide factual and timely information. Communication to the public, in particular to media representatives, is carried out exclusively by or in consultation with the Corporate Communications Department or by local Country Management, members of Corporate Management or employees commissioned by them.



## 5.8. Health, safety and environment

We protect our health and safety by complying with the guidelines governing the prevention of accidents and by being committed to responsible environmental protection at every workstation.

## 6. Conflicts of interest

Employees are expected to act in the best interest of CANDULOR. Should potential, actual or perceptible conflicts of interest emerge, transparency is required from employees.

Conflicts of interest may arise from, for example:

- personal relationships within CANDULOR,
- external mandates in politics or other companies,
- secondary employments in other companies,
- private investments or other financial interests (e.g. participations in business partners or competitors and similar),
- gifts, payments, invitations or other benefits from business partners, etc.

Should such situations arise, the employee is expected to:

- 1) assess the situation correctly, and
- 2) ideally, avoid conflicts of interest as soon as they are identified,
- 3) if unavoidable, report the situation to his or her superior (in the interests of transparency),
- 4) (the supervisor) assesses the situation objectively together with the human resources department and, if necessary, the local Compliance Agent,
- 5) and (the supervisor) makes a corresponding decision in the interest of CANDULOR, taking the utmost care possible to protect the interests of all parties involved; this decision shall be duly documented.



## 7. OBLIGATION TO REPORT SUSPECTED MISCONDUCT

Any form of misconduct may harm CANDULOR, its employees, business partners and, consequently, patients. A case of misconduct can have serious and unforeseeable consequences for the entire company.

Employees are therefore obliged to report any suspected misconduct. For this purpose, Ivoclar Vivadent has installed the "Tell Me" reporting channel, under which this report can be submitted worldwide and at any time.

The submission of a report is possible at any time for both employees and external persons via the global website of Ivoclar Vivadent or directly at <https://www.bkms-system.ch/ivoclar-vivadent>.

Omitting the submission of important reports can also be considered as individual misconduct on the part of the employee who is aware of a serious incident.

Any employee who reports suspected misconduct to the best of his or her knowledge and belief will be protected by CANDULOR against any retaliatory measures or reprisals. CANDULOR will not tolerate any sanctions against employees who report actual or suspected violations.



## 8. COMPLIANCE PROGRAM

### 8.1. Implementation

CANDULOR is a subsidiary of Ivoclar Vivadent and participates in the Compliance Programm of the parent company. The Compliance Program of Ivoclar Vivdent is headed by the Corporate Compliance Officer, who is responsible for the development, implementation and control of the program throughout the company. The Corporate Compliance Officer is supported by the Compliance Board of Ivoclar Vivadent.

Local Compliance Agents are responsible for the implementation of the program in the subsidiaries of the respective countries in accordance with the instructions provided by the Corporate Compliance Officer.

Each employee receives a copy of this Code of Business Conduct. Training courses on Integrity & Compliance are held regularly. In addition, compliance with the Code of Business Conduct is also integrated into the annual dialogue.

All employees are committed to the implementation of this Code of Conduct. Illegal or unethical actions cannot be justified by the fact that they are carried out by order of third parties, including superiors.

The members of the Corporate Management and the executives of CANDULOR assume a particular responsibility for the implementation of the Code. They are expected to provide the example in observing the basic values and principles of conduct contained in the Code of Business Conduct and, coherently, demand the corresponding conduct from their subordinates.



## 8.2. Violations and sanctions

Employees who violate or tolerate violations of the Code of Business Conduct may be subject, besides disciplinary measures, also to other consequences under labour law – up to and including termination of employment.

## 8.3. Advice and reporting of infringements

If you have any questions regarding the Code of Business Conduct, individual compliance guidelines or any other compliance topic, please contact your superior, your responsible Compliance Agent, the Corporate Compliance Officer or use the reporting channel mentioned at point 7.

You can also report a suspected violation of the Code of Business Conduct or of other rules to these persons or to employees from the HR department.