



AMANNGIRRBACH

# CODE OF CONDUCT







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# OUR MESSAGE



# EDITORIAL

We work together every single day to meet our individual targets. We have ambitious goals and a clear sense of purpose. We know our roles, we love what we do, and we take pleasure in our progress and development - for our customers, for the patients, and for ourselves.



## OUR VISION

### **Our ultimate goal**

To enable dental professionals to provide digital service for all their patients.



## OUR MISSION

### **How we get there**

By driving innovation and providing a digital ecosystem linking labs and dentists, we consolidate the relevant expertise and enable optimal care for patients.



## OUR PURPOSE

### **Why we are doing it**

We want to deploy our innovations and high-quality solutions to improve the dental health and wellbeing of people around the world.

We want our actions to make people smile. We are committed to openness, fair and respectful collaboration, and transparency at all levels along the entire value creation chain. The Code of Conduct is what guides us, our mission statement. It describes the values we share and the way we want to work - both for today and in the future. It reminds us that what matters is not only doing the right thing, but doing the right thing in the right way. This is the expectation we place on ourselves, our suppliers, our partners, and our customers. It is a promise, both to those within the company and those outside it, that we at Amann Girschbach will do everything in our power to uphold people's dignity, pride, honesty and integrity. Furthermore, we are committed to efficient and responsible use of energy and raw materials and to environmentally compatible production to ensure that we meet our responsibility toward the planet - within our company, at our sites and around the world.



Jürgen Kiesel  
(CEO)



# WHAT IS OUR MISSION?



# OUR VALUES

Values play an important role in our lives. They define what we desire and what we want to achieve. They also determine what we consider to be responsible behavior and objectionable behavior. They connect and guide our thoughts and actions and give us the courage to execute them. Amann Girschbach's global corporate values are the foundation on which

our many years of success have been built. They are the beating heart of the company. Our values are what connect our employees around the world and guide them in their actions.

Collaboration, respect, a proactive approach, reliability and exceptional performance - these are the values that we embody and cherish

at Amann Girschbach. They are the essence of our company. And they allow us to continuously develop our high-quality services and products, improve the wellbeing of our customers, patients, partners, and employees, and shape a sustainable future together.

*"Our global corporate values are the foundation on which our many years of success have been built."*

## **For you, this means...**

- \_ Always try your best and be a role model for others.
- \_ Take the initiative where required and assume responsibility for your actions.
- \_ Always meet customers, partners, and employees on an equal footing.
- \_ Pursue your goals consistently and passionately and use them to measure your progress.
- \_ Behave with integrity, respect, and consideration at all times.
- \_ Support our culture of learning and share your knowledge.
- \_ Encourage and support your employees and set aside time for leadership activities.

# OBJECTIVES AND SCOPE

At Amann Girschbach, we want to ensure that we treat one another with respect. This respect is based on ethical behavior, fair conduct and a sustainable work approach. We believe that inclusion and diversity enrich our business and that equal opportunities are essential. We place great importance on providing our employees with a safe, healthy, and suitable working environment. And we expect the same from all our business partners, customers, and suppliers.

This Code of Conduct applies to all Amann Girschbach employees worldwide - regardless of their position or area of responsibility. Further specific agreements exist for some of the principles set out in this document, and these are defined in corresponding guidelines, which apply to specific situations or to applicable local laws. Our industry is strictly regulated and subject to complex legal requirements. Violations of the law, this Code of Conduct or other guidelines present significant dangers

and risks, both to our company and to individuals - these range from fines and the loss of licenses and permits to sanctions and reputational damage.

Compliance must be taken seriously at all times - both in our conduct as individuals and as part of a team. If we support each other in this respect, we will set an example to the entire industry when it comes to medical quality, regulatory compliance and ethical business conduct.

*“This Code of Conduct applies to all Amann Girschbach employees worldwide – regardless of their position or area of responsibility.”*

## **For you, this means...**

- \_ Comply with the principles and guidelines set out in this Code of Conduct - they apply to everyone, regardless of your position or the country in which you work.
- \_ Take the time to familiarize yourself with this Code of Conduct.
- \_ If additional guidelines apply to your area of activity, these can be obtained from your supervisor or the Compliance Office - if in doubt, always ask.
- \_ If you believe that this Code of Conduct or any other Amann Girschbach guideline is inconsistent with a national law, regulation or guideline in any way, please inform your supervisor or the Compliance Office immediately.





# COMPLIANCE

We work together, we stand together. Both as individuals and as a team, our employees must perform all their duties in accordance with the company's purpose as well as this Code of Conduct, our guidelines and applicable laws.

## **Our compliance program comprises several elements:**

### **Guidelines, processes, and standard operating procedures**

The Code of Conduct outlines general compliance concepts and standards and provides a comprehensive overview of expected behavior. The country-specific guidelines provide employees with guidance regarding their work and relate to the specific processes and prevailing legal situation in the respective country.

### **Compliance training**

We offer training courses that cover the contents of this Code of Conduct and inform our employees about the applicable laws. In addition, some roles within our company may require further specialized training - for example, in the areas of sales and marketing or accounting and reimbursement. In such cases, we will notify the employees affected. Participation in the respective compliance training courses is compulsory.

### **Compliance Offices**

Our Compliance Offices are staffed by experienced experts. They support all departments across our company and are the point of contact for any situation where there are compliance concerns. They are always available to provide straightforward assistance - in many cases, asking a question is the best way to determine whether a particular course of action is appropriate.

### **Various communication channels - incl. a whistleblowing system**

In addition to supervisors, HR departments and the Compliance Offices, employees are able to contact the whistleblowing system at any time for a confidential discussion.

### **Internal auditing and monitoring**

Common standards allow ambiguities or deficiencies to be quickly identified.

### **Immediate response and corrective handling of violations**

We ensure that compliance issues are addressed in a transparent manner and we do everything we can to resolve them quickly using the correct procedures.

*"We work together.  
We stand together."*

### **For you, this means...**

- \_ If you are unsure what action to take or whether a particular approach is appropriate, read this Code of Conduct and our company's related guidelines.
- \_ If you are in any doubt, you can ask your supervisor at any time and you should do so without delay. If you have any questions or there is anything you feel unsure about, contact the local or regional Compliance Office or In-house Legal Counsel - this point of contact is easy and straightforward to use.
- \_ If you still have concerns after following the aforementioned steps, contact the Amann Girschbach whistleblowing system - you can do this either with complete anonymity or by providing your name. The whistleblower website is operated by an independent third party. For more detailed information, please see the Amann Girschbach Whistleblower Policy at:  
<https://www.amanngirschbach.com/en/company/policies-governance/>

# REPORTING POTENTIAL VIOLATIONS

As a company, we are committed to an ethically sound corporate culture and business management approach - and, of course, to compliance with the specific laws of our industry. Consequently, any suspected violation of a law, this Code of Conduct or company guidelines will be taken seriously and investigated by Amann Girschbach.

Each and every one of us must take responsibility. Our top priority is to ensure that individuals who have reported a reasonable suspicion of violations of the law, this Code of Conduct or Amann Girschbach's rules and guidelines do not incur any unlawful penalties.

*“As a company, we are committed to an ethically sound corporate culture and business management approach.”*

## For you, this means...

- \_ You can and should report suspected violations of the law, this Code of Conduct, or a guideline as well as any ethically questionable or inappropriate practices to your supervisor, Human Resources, or the Compliance Office.
- \_ You may also submit a confidential and anonymous report via the whistleblowing system (to the extent permitted by law).
- \_ If you believe you are the target of harassment or unlawful penalties because you have reported or wish to report an actual or potential violation, please contact Human Resources immediately.
- \_ Please do not hesitate to reach out with any questions you may have on this topic.

If you have any questions or suspicions or would like to report a violation, please contact:

**Compliance Office** - [compliance@amanngirschbach.com](mailto:compliance@amanngirschbach.com)

**Whistleblowing system** - <https://bit.ly/3qazMNq>





# RESPONSIBILITY AND IMPLEMENTATION

We live up to our responsibility every day. We follow our Code of Conduct, we embrace our guidelines, and we respect applicable laws. We refrain from any actions or behaviors that are not compliant - these will not be tolerated, endorsed, or encouraged in any way.

*"We live up to our responsibility every day."*

## For you, this means...

- \_ In addition to reporting a violation of the Code of Conduct, our guidelines, or the law, you will, where necessary, assist with the investigation and resolution of such violations.
- \_ Always model good behavior.
- \_ Encourage a working culture where questions are welcome - open, honest, and transparent communication is beneficial in any situation.
- \_ Address integrity issues whenever they become apparent.
- \_ Never tolerate unlawful penalties against individuals who report concerns or incidents related to violations of the Code of Conduct, guidelines, or laws.
- \_ Initiate the necessary steps if our Code of Conduct or guidelines are not followed.

If you have any questions or suspicions or would like to report a violation, please contact:

**Compliance Office** - [compliance@amanngirrbach.com](mailto:compliance@amanngirrbach.com)

**Whistleblowing system** - <https://bit.ly/3qazMNq>

# HOW DO WE WORK EVERY DAY?





# QUALITY AND INNOVATION

A passion for digital dental technology has been our driving force for many years. During this time, there have been a lot of changes - this can be clearly seen in our range of products and services, which are subject to continuous enhancement and optimization. Thanks to our high standards of quality and innovation, we are considered a guarantor of premium innovative materials, outstanding product quality, and sophisticated system solutions within the global dental industry. The high

level of regulation within our industry also means that customers can rest assured that all our products comply with the applicable laws and regulations (e.g. the new Medical Device Regulation of the European Union, which came into effect in 2021).

We know that the quality and safety of our services and products form the foundation of our business. For this reason, we use surveys and feedback to ensure continuous improvement in the quality of our

services and products. In addition, we ensure active safety and quality management across the entire life cycle of our products - from research and development to production and transport right through to recycling and disposal. This includes a standard review of data, complaints, and feedback. Innovation and quality are integral components of our corporate DNA.

*“Innovation and quality are integral components of our corporate DNA.”*

## **For you, this means...**

- \_ Ensure that your actions are ethical, fair, courteous, competent and proactive.
- \_ Always be truthful in your communications with customers and partners and resolve any issues promptly.
- \_ Always give an honest account of the nature and quality of our services, products, prices, and other information.
- \_ Collect and process the personal data of customers, partners, and suppliers in accordance with applicable laws and guidelines.
- \_ Always make use of the latest scientific findings for continuous quality improvement purposes.
- \_ Make product safety your top priority.
- \_ Demonstrate strict compliance with the law and the company's internal guidelines with regard to safety and quality.
- \_ Comply with the law and our company guidelines when adverse events come to light or product complaints are received.

# PREVENTING CORRUPTION AND BRIBERY

Sustainable success is based on quality, integrity, competence, and innovation - not on unethical behavior. That is our philosophy at Amann Girschbach. However, corruption is a global, multifaceted, cross-border issue, and we have no intention of turning a blind eye. At Amann Girschbach, we want to improve people's wellbeing. As part of this objective, we need to do our bit to change the world for the better. We will not tolerate any form

of corruption and we condemn any such criminal activity in the strongest possible terms.

Corruption can take many forms - from undue influence to embezzlement and bribery. Regardless of the context, corruption causes significant financial and reputational damage and harms many for the benefit of a few. As a global company, we comply with the anti-corruption

laws of each country in which we operate. This includes the US Foreign Corrupt Practices Act ("FCPA"), the British Bribery Act, and respective national laws. We are fully committed to preventing corruption. In turn, we expect the same commitment from our business partners, in particular from sales partners and suppliers, when it comes to preventing and combating corruption.

*"We do not tolerate any form of corruption."*

## **For you, this means...**

- \_ Read, observe, and follow our corporate anti-corruption guideline.
- \_ Be aware that stricter rules of conduct may apply when working with public officials and healthcare professionals, depending on national laws.
- \_ Refrain from any kind of undue influence on third parties, in particular on business partners, public officials, and healthcare professionals.
- \_ Never offer, authorize, or provide payment or anything else of value to exert undue influence on an individual.
- \_ Do not request, accept, or receive anything of value from anyone who seeks to influence you in your business decisions.
- \_ Consult with your supervisor and the Compliance Office if you are unsure whether your conduct is permissible.



# FIGHTING MONEY LAUNDERING

We excel in our sector with high-quality services and products - and with morally and legally sound conduct at all levels. The precision we apply to our technology services and products is matched by the passion with which we live our shared values.

At Amann Girrbach, we comply with all legal provisions aimed at combating money laundering. Money launder-

ing is generally defined as follows: executing a transaction using assets derived from a criminal act, structuring a transaction so as to bypass a reporting requirement for the detection of criminal activity, or carrying out a transaction as a continuation of a criminal act. The term money laundering also covers any kind of concealment of the origin of assets obtained from a criminal act as

well as the appropriation, safe-keeping, investment, management conversion, exploitation, and transfer of such assets.

*“We excel in our sector with high-quality services and with morally and legally sound conduct at all levels.”*

## **For you, this means...**

- \_ Take all appropriate steps to ensure that you only maintain business relationships with trusted business partners who are involved in legitimate business activities with funds from legitimate sources.
- \_ To this end, implement measures such as risk-based due diligence business partner reviews.
- \_ If there is the slightest doubt, contact your supervisor and the Compliance Office immediately.

# FAIR COMPETITION

Transparency in all matters is one of our fundamental principles. Our work and communications are open, traceable, and comprehensible at every single step and in every one of our projects.

We are committed to fair competition and conduct our business in compliance with all applicable anti-trust, competition, and fair trading laws. A violation can have considerable repercussions for the company as well as for individual employees. Verbal agreements and concerted practices are punished in the same way as written agreements.

*“Our work and communications are open, traceable, and comprehensible.”*

#### **For you, this means...**

- \_ Do not disclose information regarding confidential matters in discussions or other communications with competitors.
- \_ Do not collude in business issues that determine or influence competitive behavior.
- \_ If there is the slightest doubt, inform your supervisor or the Compliance Office.



# CONFLICTS OF INTEREST

We pursue the highest standards when collaborating with our partners, customers, and suppliers because trust is the foundation of a long-term and successful business relationship.

We are all part of Amann Girrbaach and we always act together in the interests of the company. We are committed to protecting our company and our reputation. Conflicts of

interest must be avoided from the outset. Problems may arise from relationships or commitments of individual employees that have even the slightest semblance of a conflict of interest. Together with the Compliance Department, supervisors are responsible for initiating measures to protect employees and Amann Girrbaach from compromising or damaging decision-making processes.

*“Trust is the foundation of a long-term and successful business relationship.”*

## **For you, this means...**

- \_ Inform your supervisor of any conflicts of interest that affect or could affect you or of any relationships or commitments that could create the appearance of a conflict of interest.
- \_ If you or a member of your family has a financial interest in an organization with which Amann Girrbaach does or may do business or with which Amann Girrbaach competes, notify your supervisor immediately. Financial interest in this context means: an employment relationship, ownership, or participation as a member of the board of directors.
- \_ If you have a second job with a competitor or supplier of Amann Girrbaach, regardless of the nature of this job, please inform your supervisor.
- \_ If you have a relationship that could affect your decision-making as an employee at Amann Girrbaach, inform your supervisor. The same applies if one of your family members has such a relationship.

## RULES ON INTERNATIONAL TRADE

As a globally operating company, we move products, technologies, and information around the world on a daily basis. Throughout these processes, we strictly abide by the trade laws applicable to our industry. Because we know that we will only be able to improve the standard of living and wellbeing of people around the world on a long-term basis if we - and everyone else - act according to fair rules.

Trade laws regulate the trade, import, export, transfer, and movement of goods, services, technology, and funds. At Amann Girrbach, we implement guidelines to ensure internal company compliance with trade laws. Ultimately, a violation of a trade law has far-reaching consequences, not only for our company as a whole, but also for the individuals involved. This must be avoided at all costs.

*"We strictly abide by the trade laws applicable to our industry."*

### **For you, this means...**

- \_ Be aware that a violation of trade regulations can have severe consequences for the people involved as well as for the company - not only in terms of our image, but also from a financial and legal perspective.
- \_ If you work for Amann Girrbach in the field of trade and/or export, thoroughly familiarize yourself with the applicable trade regulations and follow them to the letter.

# SELECTING SUPPLIERS

At Amann Girrbach, we place great importance on prudence and reliability. This applies to our contact with one another as well as our interactions with our suppliers and partners. We are guided by the highest standards to ensure a reliable supply of our services and products to our customers. We focus on achieving optimal quality in all our activities and

products and we ensure continuity of supply as well as the success of our company by maintaining competitive costs.

When selecting our suppliers and contractors, we use transparent procedures and take sustainability criteria into account. Wherever possible and practical, our purchasing strategy is

to solicit at least two sources for supply-critical and price-critical services or products. In accordance with our Code of Conduct for Suppliers, we also expect our high ethical standards to be observed within supplier companies and in the corresponding supply chains.

*“When selecting our suppliers and contractors, we use transparent procedures and take sustainability criteria into account.”*

## **For you, this means...**

- \_ When ordering services or products for our company, make sure you strictly observe our high standards, legal framework, and purchasing guidelines.
- \_ Familiarize yourself with the Code of Conduct for Suppliers prior to your activities.
- \_ If you have any questions or are unsure of anything, contact your supervisor directly.
- \_ Wherever possible, always ask the purchasing department to contact two different suppliers.



# ENVIRONMENTAL PROTECTION

Environmental protection affects us all - today more than ever. We all have to take responsibility and do our bit to protect the natural world. Economic viability and environmental protection are not contradictory terms. Quite the opposite: Nature is the basis of all life and the source of our resources and raw materials. This means that protecting the natural world also helps to safeguard our business activities.

We are therefore dedicated to the responsible use of resources. We are committed to developing, manufacturing, and using our services and products in a sustainable manner. We implement standards for reducing environmental risks, for complying with environmental laws, and for appropriate reporting procedures. At the same time, we strive to make efficient use of renewable and/or recycled resources such as water, electricity, and raw materials.

We are constantly working to minimize any potential undesirable effects of our activities on the environment. We are committed to complying with applicable laws, the ESG Guideline, and this Code of Conduct. We take all necessary precautions to avoid environmental incidents. Moreover, we at Amann Girrbach actively raise awareness of environmental issues - because only those who acknowledge problems will be able to find the solutions.

*“Environmental protection affects us all.”*

## **For you, this means...**

- \_ Do not hesitate to propose any ideas you may have on how we can make our processes even more sustainable or do more to protect the environment.
- \_ Comply with our guidelines and standards to help protect the environment.
- \_ Take responsibility and try to change any everyday behaviors that may have a negative environmental impact.



# DONATIONS AND SUPPORT

We value corporate commitment at a societal and social level - and our own contribution is based on deeply held beliefs. At Amann Girrbach, we invest resources to improve healthcare and support a wide variety of initiatives.

In this context, we donate to charities or non-profit organizations in the regions and areas in which we

operate. In addition, we sponsor events focusing on medical education or the explanation of scientific topics relating to healthcare as well as supporting events aimed at improving dental care. We also support events that help improve dental care. Our involvement in the form of donations or financial support is never intended to obtain, preserve, or ensure an un-

fair advantage. We are committed to ensuring that our donations and support are traceable and transparent.

*“We invest resources to improve healthcare and support a wide variety of initiatives.”*

## **For you, this means...**

- \_ Make sure that any corporate donation or support is approved in advance by our internal experts to ensure compliance with the applicable laws and our guidelines.
- \_ As we also sponsor educational events hosted by well-known healthcare organizations, it is important that all check regarding the applicable laws and policies in this area are conducted in advance.

# HOW DO WE INTERACT?





# RESPECT FOR HUMAN AND LABOR RIGHTS

It is in our own interest to protect and uphold the rights of all people in all circumstances. Only then can we do what we do best - use our high-quality services and products to restore and improve the oral and dental health and the wellbeing of people around the world. For this reason, mutual respect, honesty, and integrity form the foundation of our work. Our top priority is the safety and health of our employees, but also of our business partners and their employees as well as the people who live and work close to our sites. This is our responsibility and it is one we take seriously.

Amann Girschbach complies with applicable laws and is guided by the principles of the United Nations Universal Declaration of Human Rights and the 1998 International Labor Organization Declaration on Fundamental Principles and Rights at Work. We strongly condemn exploitation and illegal child labor and we do not tolerate forced labor of any kind, including modern slavery and human trafficking.

*“It is in our own interest to protect and uphold the rights of all people in all circumstances.”*

## **For you, this means...**

- \_ You share responsibility for ensuring that safety precautions are followed.
- \_ Do your best to minimize risks.
- \_ If you receive information that human and/or labor rights are being violated in any way along the value creation chain, please contact your supervisor or the Compliance Office.



# INCLUSION, DIVERSITY, AND EQUAL OPPORTUNITIES

Diversity offers new opportunities. Diversity and inclusion enrich our lives and our working environment. We are an open-minded global company and we value each and every one of our employees, customers, and suppliers. Here at Amann Girrbach, equal opportunities for all is a matter of principle. Our corporate culture is one in which all our employees can contribute their individual perspec-

tives, talents, and experience. This enables us to realize our full potential, increase our performance, and strengthen our innovative power.

We have a zero tolerance policy on discrimination or harassment of any kind, including sexual harassment. We do not tolerate discrimination on the basis of ethnic origin, color, nationality, biological or practiced gender, sex-

ual identity and orientation, physical or mental disability, political opinion, religion, age, marital status, or any other category protected by law.

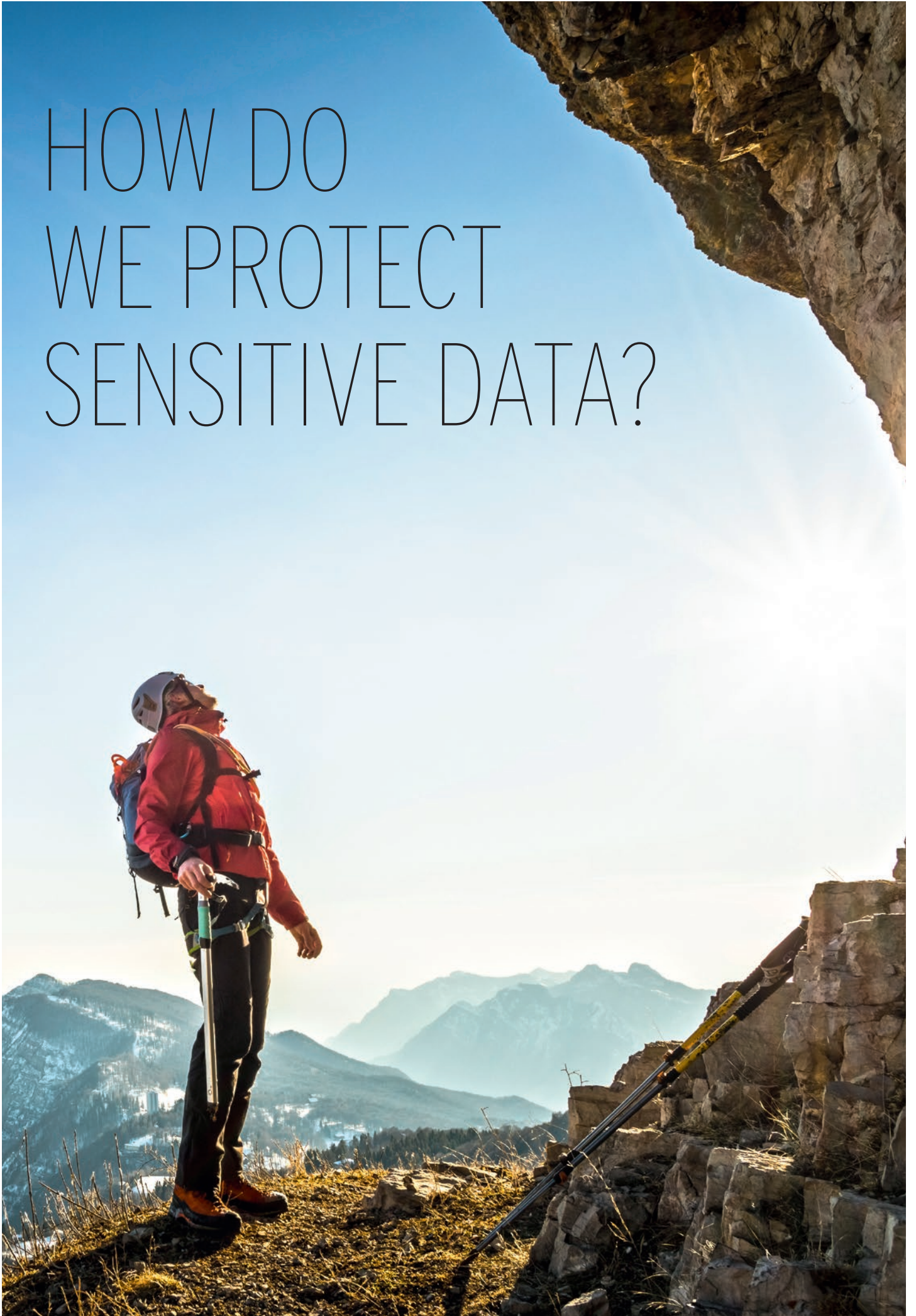
*“Diversity and inclusion enrich our lives and our world.”*

## **For you, this means...**

- \_ Help to create and maintain a work environment free from discrimination.
- \_ Report confirmed as well as suspected violations to your supervisor.
- \_ If you have any suspicions or doubts, contact your supervisor or the Compliance Office immediately.



# HOW DO WE PROTECT SENSITIVE DATA?



# DATA PROTECTION AND PERSONAL DATA

Personal data is a sensitive asset, which requires protection. Trust and respect play a key role when it comes to processing personal data, and we meet our responsibilities in this respect. We protect the information entrusted to us to the best of our ability.

At Amann Girrbach, we take data protection and data security very seriously at all times. This applies to our dealings with all stakeholders - from employees and customers to suppliers and all other individuals. We only collect personal data if we are legally authorized to do so and/or if there is a justified business purpose. Our actions in this context are transparent and comply with the

applicable laws and internal guidelines. The use of personal data for unlawful or personal purposes or for personal gain is strictly prohibited. Access to personal data, including employee data, is always restricted in accordance with the need-to-know principle.

*“Personal data is a sensitive asset, which requires protection.”*

## **For you, this means...**

- \_ Make sure you have a thorough understanding of the company's internal data protection guidelines.
- \_ Remember that personal data always needs to be protected.
- \_ Exercise maximum care and diligence when processing the data entrusted to you.
- \_ Only collect the data that is absolutely necessary and only process this data for specific legitimate purposes.
- \_ Only forward personal data to authorized recipients and in accordance with the need-to-know principle.
- \_ Ensure appropriate precautionary measures are in place when dealing with third parties and service providers.
- \_ If you have any questions, contact the local data protection officer at any time.

# PROTECTING CONFIDENTIAL INFORMATION AND BUSINESS SECRETS

Trust is the foundation of every good relationship. This applies at both a personal and professional level. At Amann Girschbach, we practice sound, responsible cooperation, which is characterized by knowing the importance of being a successful company. Our success is based on our innovations and many years of expertise, and we protect both in a targeted and sustainable manner.

Our company's information and business secrets must always be treated confidentially, regardless of whether they are labeled as "confidential" or "restricted access". All employees have an obligation to maintain confidentiality in this regard, even once their employment with Amann Girschbach has come to an end.

*"Our success is based on our innovations and many years of expertise, and we protect both in a targeted and sustainable manner."*

## **For you, this means...**

- \_ Do not share any professional information or business secrets you acquire during your employment - they are not intended for third parties.
- \_ This confidentiality rule continues to apply even once your employment has come to an end.
- \_ Keep all forms of information and business secrets, whether digital or analog, safe and secure.
- \_ Disclosing information or business secrets may result in legal consequences.



# INTELLECTUAL PROPERTY

Our actions are governed by mutual respect. At Amann Girrbach, we value diversity of personalities, diversity of opinions, and diversity of individual ideas and expertise. Our intellectual property is one of the cornerstones of our company and ensures our long-term success.

Whether it's patents, trademarks/ brands, copyrights, business secrets, technical knowledge, scientific findings, or specific expertise - our intellectual property sets us apart and makes us unique. Protecting this intellectual property is critical to ensuring that our innovations succeed and can create first-class services

and products. In turn, we respect the intellectual property of others and will never illegally acquire or duplicate intellectual property without authorization. In this way, we all ensure that Amann Girrbach is and remains a reliable partner.

*“Our intellectual property is one of the cornerstones of our company and ensures our long-term success.”*

## For you, this means...

- \_ Only use our company's equipment and data for business purposes or for the correct execution of tasks.
- \_ Always handle data with due diligence.
- \_ Take all necessary preventive measures to protect computers or other electronic devices from unauthorized use, access, or software modification. Confidential company data requires particular protection.
- \_ If company-owned devices or devices containing company data are lost, damaged, or compromised, this must be reported to the Compliance Office or IT department immediately.
- \_ Report any suspected misappropriation, tampering, falsification, or destruction of records or data immediately. Even if this is only a suspicion, speak to your supervisor or the Compliance Department.
- \_ Strictly follow the IT department's cybersecurity instructions.
- \_ Only share project information, technical details, or other confidential company information with authorized individuals.
- \_ Do not transcribe or copy data or disclose business secrets unless absolutely necessary for the performance of official duties.
- \_ Do not disclose confidential information of a former employer or third party while working for our company.
- \_ Refrain from any action that may result in a potential fine or penalty.

# SELF-DEALING

At Amann Girschbach, we cultivate a corporate culture of mutual appreciation and trust. In this context, we encourage our employees to declare potential conflicts of interest and discuss these with their supervisor. This is the best form of prevention. A particular form of such a conflict of interest is known as self-dealing - in which employees derive a personal

benefit from information obtained in the course of their activities for Amann Girschbach.

Any business opportunity that arises during business dealings on behalf of Amann Girschbach belongs to the company and not the employee. The use of Amann Girschbach property or information or the use of a position within

the company to obtain a personal benefit or benefit for a third party is not permitted. This includes any other form of self-enrichment. The personal exploitation of a business opportunity that arises in connection with work for Amann Girschbach, and which therefore belongs to the company, is also prohibited.

*“Self-dealing is a particular form of a conflict of interest.”*

## **For you, this means...**

- \_ If you identify a potential business opportunity related to your activities at Amann Girschbach, discuss this with your supervisor.
- \_ Be aware that you may not use the information you obtain in the course of your activities for Amann Girschbach to enrich yourself or third parties or to derive a personal benefit.
- \_ Business opportunities that arise for you in your role at Amann Girschbach always belong to the company and not to you as an employee.

# BOOKKEEPING AND ACCOUNTING

Our partners, customers, and suppliers trust us, and we want to earn this trust each and every day. Accurate business records as well as truthful and complete accounting are therefore essential for our business - not only as a legal requirement, but also because they form the basis for business decisions and are therefore

indispensable for successful corporate management.

By maintaining accurate business records, we comply with our legal obligation to provide complete, truthful, accurate, and timely financial reports and disclosures. Our books, records, and accounts reflect and document

our business transactions accurately and in full. These records include financial memoranda, schedules, receipts, invoices, expense reports, payroll records, benefits records, performance appraisals, and any other relevant company data.

*“Our partners, customers, and suppliers trust us, and we want to earn this trust.”*

## **For you, this means...**

- \_ Maintain all physical and electronic records in accordance with legal requirements and guidelines.
- \_ You must comply with internal control requirements to ensure that financial records and accounts are maintained correctly.
- \_ In order to ensure accurate accounting, all records must contain reliable information about the services rendered or received or the products purchased or sold.
- \_ Be diligent and attentive in your record keeping - this is the only way to ensure correct and timely documentation.
- \_ Every employee is responsible for recording his or her information in a complete, comprehensible, and accurate manner.



# HOW DO WE COMMUNICATE?





# PROVIDING INFORMATION TO THE AUTHORITIES

At Amann Girschbach, we have complete confidence in our constitutional state and in its authorities and administrations. We are convinced that stable economic conditions - from which we all benefit - are only possible if authorities and public officials are able to perform their work without hindrance. And we play our part.

Amann Girschbach always conducts its business in a transparent and compliant manner. Our employees, our customers, and our suppliers, as well as the people in the region, can depend on this. We therefore respond to any regulatory review, inspection, or investigation in an appropriate manner.

*"We always conduct our business in a transparent and compliant manner."*

## **For you, this means...**

- \_ If you receive regulatory inquiries that fall outside your normal area of responsibility, please notify your supervisor and the Compliance Office immediately.
- \_ Notify the Compliance Office immediately if an unusual or potentially undesirable request is received from a government agency or official (e.g., a subpoena, court order, or request for a deposition)
- \_ Notify the Inhouse Legal Counsel responsible for your region or country immediately if you are approached by an enforcement authority outside of Amann Girschbach's premises and in connection with your employment at or contract with Amann Girschbach (unless the authority has prohibited disclosure by law).

# COMMUNICATING WITH THE MEDIA

At Amann Girrbach, we promote a culture of open communication at all levels, both internally and externally. Because honest communication is the foundation for trust. And trust is the key to success - this is our firm belief.

The media observe, evaluate, and explain. To do this, they need information from the companies on which they report. In turn, companies de-

pend on their messaging and content being disseminated via the media. Good journalism needs good PR and good PR needs good journalism. And as in any relationship, the required trust develops and thrives on positive experiences. This is most effective if we present a common voice to the outside world, avoid contradictory content, and follow a consistent line of communication.

*“At Amann Girrbach, we promote a culture of open communication.”*

## **For you, this means...**

- \_ Immediately forward all media inquiries to the Corporate Communications department or to the Executive Assistant.
- \_ As a general rule: All information provided to the media must be agreed in advance and released by Amann Girrbach.

## DEALING WITH SOCIAL MEDIA

Social media have become an indispensable part of contemporary corporate communications. They allow target groups to be reached directly and instantly, and they provide opportunities for involving and mobilizing these groups. Our employees also use social media keep themselves informed, to stay in touch with friends, or to share their lives with others.

However, we want all our employees to be aware that they also act as ambassadors for our company. For this reason, there are certain rules that need to be observed on social networks, and these have been translated into specific guidelines. Moreover, when using social media, each individual is responsible for the security of internal and confidential information.

*“There are certain rules that need to be observed on social networks, and these have been translated into specific guidelines.”*

### **For you, this means...**

- \_ Never use social media for customers and partners unless you have been instructed to do so by Amann Girrbach or it is necessary for the performance of business tasks.
- \_ You may not store, post, communicate, share, or transmit internal or confidential information on social media.
- \_ Do not post customer opinions about services or products provided by Amann Girrbach or our competitors. As employees, we are obviously not unbiased consumers.
- \_ Never use social media to conduct official Amann Girrbach business unless you have prior approval from your supervisor.
- \_ Never disclose personal data.
- \_ Always act with honesty and integrity on social media.
- \_ Always post personal opinions and comments on private social media under your own name; do not use Amann Girrbach’s name or other identifiers, such as the company e-mail or mailing address, unless you have been authorized to do so.
- \_ If you post an opinion and mention Amann Girrbach, always make clear that you are speaking as a private person.
- \_ Follow our guidelines and this Code of Conduct when you can be identified as an Amann Girrbach employee - for example, when posting on a company page.
- \_ Always respect the rights of third parties, including the protection of their data, trademarks, brands, and copyrights. Everything our employees publish on the Internet should be considered as potentially traceable.
- \_ Be aware that any posts, whether of a private or professional nature, can ultimately always be linked back to Amann Girrbach, even if they are not obviously connected to the company.



# ADVERTISING AND MARKETING

Efficient, well-implemented marketing plays a significant role in the success of a company. It allows us to present and raise awareness of our company with the outside world as well as attracting new customers, partners, and suppliers. When conducting our business activities and marketing our services and products, we must com-

ply with strict guidelines. We have therefore drawn up specific guidelines for this purpose. These ensure that our corporate practices, marketing, and promotional activities are compliant with this Code of Conduct and the legal framework.

*“Efficient, well-implemented marketing plays a significant role in the success of a company.”*

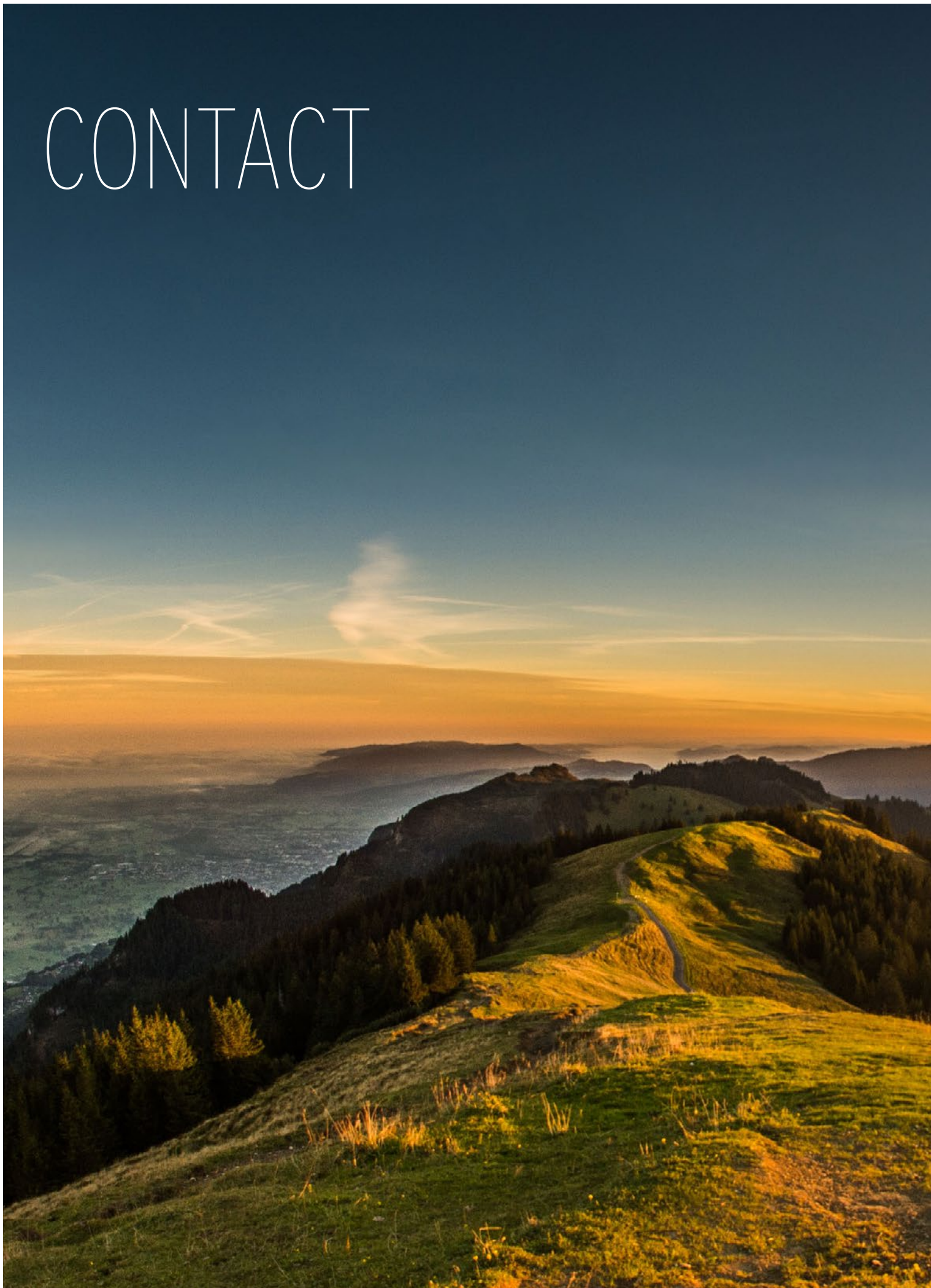
## **For you, this means...**

- \_ Be aware that all marketing communications and promotional materials relating to our products must also comply with the regulatory standards of the individual countries in which they are published. Always check that the material complies with our guidelines and, if in doubt, send the material to Regulatory Affairs for approval.
- \_ Always be truthful, accurate, and unambiguous in your communications.
- \_ Always describe benefits and risks in a balanced and fair manner.
- \_ Promotional claims must always be consistent with the product uses approved by the government of the respective country. These claims may only be disseminated within the scope of the applicable laws.





# CONTACT



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**Compliance Office**  
[compliance@amangirrbach.com](mailto:compliance@amangirrbach.com)

**Whistleblowing system:**



<https://bit.ly/3qazMNq>





## ABOUT AMANN GIRRBACH

As a pioneer in dental CAD/CAM technology, Amann Girschbach is one of the leading innovators and preferred full-service providers in digital dental prosthetics. With its high degree of expertise in development and commitment to customer orientation, the company offers sophisticated product and workflow solutions. In addition to innovative scanning and production solutions, in which software systems and the AG.Live cloud platform play a central role, the portfolio is rounded off by high-quality materials, a dedicated technical service with a global helpdesk as well as education and training courses. Its customers in around 100 countries are made up of dental practices, practice laboratories and dental laboratories. A high standard of quality and sustainability are decisive value creation criteria for Amann Girschbach, which is why the company has housed its entire development and production at its headquarters in Mäder, Austria. In addition, Amann Girschbach operates sales offices in Pforzheim (Germany), Verona (Italy), Jossigny (France), Charlotte (USA), Singapore (city), Curitiba (Brazil), Beijing (China) as well as cooperations in Kyoto (Japan) and Beirut (Lebanon).



We would be pleased to also inform you personally. Simply contact us!

On our website you will find further information about our locations and contact details so that you can reach us quickly.

[bit.ly/ag-contact](https://bit.ly/ag-contact) ↗

