



# CANDULOR

## CODE OF BUSINESS CONDUCT

### INTRODUCTION

CANDULOR AG endeavors to sustainably increase the company's value for customers, partners, employees and shareholders through continuous improvement in competitiveness. We know that we can only achieve this goal if our success is based on correct and honest business conduct. A precondition is the integrity of its management and employees whose activities are guided consistently along ethical principles.

The CANDULOR Code of Conduct is a guideline for the principles of conduct both within and outside the company. Managers and employees are equally obliged to follow the provisions of the Code of Conduct.

In addition to respective legal requirements, this Code of Conduct is a binding framework for action for all employees of the company. Details on the Code of Conduct are governed by the guidelines.

Claudia Schenkel - Thiel

Managing Director



## 1. OUR RELATIONSHIP AMONGST EACH OTHER

We create a positive working environment by being respectful, fair and professional in our dealings with each other. People are employed and supported by CANDULOR AG for their abilities and performance. We do not tolerate mobbing, harassment or discrimination.

## 2. DEALINGS WITH BUSINESS PARTNERS

We place great value on nurturing our business relationships. However, these relationships can never be more important than our ethical principles which pledge us to honesty, integrity and compliance with legal regulations. We choose our business partners solely on the basis of factual, business-relevant criteria. We are careful to ensure that our business partners share our Code of Conduct in terms of business practices and ethics. We do not offer or accept business courtesies which could influence business decisions. We do not tolerate bribery. Donations must be transparent. They may not be made dependent on the purchase of our products or be used to obtain a direct business advantage.

## 3. DEALINGS WITH OFFICIALS, POLITICALLY EXPOSED PERSONS/PARTIES

It should be noted that the law on dealings with officials imposes considerably lower standards with regard to bribery offenses. We do not grant payment or pecuniary benefits to officials, politically exposed persons or political parties. Payments to civil servants or representatives of authorities to expedite administrative procedures are to be refrained from as a matter of principle.



## 4. DEALINGS WITH COMPETITORS

We act in a fair manner with our competitors. We do not participate in illegal competitive behavior, for example, price-fixing arrangements or abuse of a dominant market position.

## 5. GENERAL BUSINESS CODE OF CONDUCT

### 5.1 Compliance with legal regulations

We pledge to comply with laws, regulations and guidelines. We expect our employees to know and comply with the legal requirements pertaining to their job.

### 5.2 Quality

To exist in the market, we require top quality products which meet the expectations of our customers. Our employees contribute their share by taking on the responsibility for the quality of their work and its continued advancement. The managers are obliged to demand and implement quality.

### 5.3 Financial integrity

With the meticulous, complete and punctual documentation of business processes, we ensure that accounting is performed to financial reporting standards and that the results give a true picture of business activities. CANDULOR AG supports the fight against money laundering, corruption and fraud. In case of doubt as to the legitimacy of financial transactions, in particular cash transfers, the competent finance department is to be involved.

### 5.4 Protection of trade secrets and intellectual property

Trade and business secrets must be treated confidentially and protected. This also applies to other information in which CANDULOR AG, the contractual partners and customers have a vested interest in confidentiality.



### 5.5 Protection of personal data

The protection of privacy when processing personal data is an important issue for us and is treated with full respect in all our business processes.

### 5.6 Conflicting interests

We expect our employees to act in the best interests of CANDULOR AG. If potential or actual conflicts of interest become apparent, for example, if personal interests, family or other bonds oppose the interest of the company, employees shall inform their respective supervisors. CANDULOR AG will take appropriate measures to settle or prevent (potential) conflicts of interest.

### 5.7 Managing company assets

We protect the company's assets by managing the company's property, intellectual property rights and information with due care to prevent loss, theft or damage. CANDULOR AG's equipment and information systems are intended for business purposes. Reasonable private use is only permissible if it does not contradict company interests.

### 5.8 Communication and media

We provide information in a factual and timely manner. Communication with the public, in particular with members of the media, is managed exclusively or in consultation with the department responsible for corporate communications.

### 5.9 Health, safety and environment

We protect our health and safety by complying with guidelines for accident prevention and being dedicated to responsible environmental protection at every workplace.



## 6. COMPLIANCE PROGRAM

### 6.1 Implementation

Our Compliance Program is governed by the Compliance Board which is responsible for the development, implementation and control of the program throughout the company. Local compliance officers in the subsidiaries are responsible for implementing the program according to the provisions of the Compliance Board. Every employee is given a copy of this Code of Conduct. Training on the topic of compliance is conducted at regular intervals. Compliance with the Code of Conduct is an integrated part of the employees' annual review. All employees are dedicated to implementing this Code of Conduct. Illegal or unethical actions cannot be justified because they were carried out on instructions from third parties, including supervisors. Management and company executives at CANDULOR AG bear special responsibility for implementation. They exemplify the fundamental values and principles of action contained in the Code of Conduct and shall consistently demand appropriate conduct from their subordinate employees.

### 6.2 Infringements and sanctions

Employees who violate the Code of Conduct or tolerate infringements may, in addition to disciplinary measures, also be subjected to further consequences under labor laws, even leading to termination of the employment contract.

### 6.3 Advice and reporting of infringements

If you have questions regarding the Code of Conduct, the guidelines or other compliance topics, please approach your supervisor, the local compliance officer or the General Counsel Ivoclar Vivadent. You can also report a suspected violation of the Code of Conduct to these persons. CANDULOR AG will not tolerate sanctions against employees who report actual or suspected violations of the Code of Conduct.

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