

## Planmecca Group – Global Distributor and Supplier Code of Conduct

### Introduction

Planmecca Group is committed to ethical and sustainable business practices. We are continuously developing the sustainability and corporate responsibility of our operations. We follow the ten principles of United Nations Global Compact (UNGC) and the guidelines of International Labour Organization (ILO). We expect our distributors and suppliers throughout our supply chain to comply with these principles related to human rights, labour, sustainability, and anti-corruption, as well as with this Global Distributor and Supplier Code of Conduct.

This Code of Conduct provides the distributors and suppliers of Planmecca Group with guidelines based on the principles of UNGC and ILO and is an integral part of our distributor and supplier agreements. Our distributors and suppliers must comply with this Code of Conduct and make their employees aware of this Code of Conduct. Planmecca Group encourages its distributors and suppliers to review, monitor and develop corporate responsibility and sustainability in their operations and management processes, and to set up or develop their own compliance and corporate responsibility programmes.

### Business ethics and management systems

#### General principles of business ethics and integrity

At Planmecca Group, we comply with all laws and regulations applicable to our operations. We expect the same from all our business partners. We do not accept any illegal behaviour from our partners and expect them to never incite or advise anyone to violate applicable laws. At Planmecca Group, we are committed to doing business the right way and we expect our distributors and suppliers to do the same.

#### Risk management

Distributors and suppliers are expected to identify and control risks related to ethics, labour practices, environment, health, and safety in their operations.

#### Responsible sourcing

Suppliers are expected to implement the principles of this Code of Conduct in their own sourcing processes to ensure the accurate source and safety of the products and materials. Suppliers must be able to present formal evidence of their material sources if requested by Planmecca Group. Suppliers shall also ensure that their products do not contain conflict minerals (tin, tantalum, tungsten, or gold) originated from conflict and high-risk areas. Suppliers shall ensure that their sub-suppliers comply with this Code of Conduct or at least substantially follow similar standards of ethical business.

#### Accurate business records

Financial integrity is of vital importance to Planmecca Group. All operations and accounting of our distributors and suppliers shall be conducted according to applicable laws in an accurate and reliable manner.

### Regulatory obligations and fair business practices

#### Anti-bribery and anti-corruption

Planmecca Group prohibits all forms of bribery and corruption in all circumstances. A distributor or supplier should never offer to pay or accept any bribes, kickbacks or facilitation payments or engage in other corrupt practices. This also applies to using third parties to facilitate bribery or other corrupt practices.

**Sanctions and export controls**

Our distributors and suppliers must follow all applicable national and international trade compliance requirements such as sanctions laws, trade embargoes, and other export control laws. These include any sanctions lists issued by the European Union, the United States of America, the United Kingdom, and the United Nations. Distributors and suppliers shall cooperate with Planmeca Group companies to ensure that all required end-customer, distributor, and supplier due diligence information is collected and that Planmeca Group products are not delivered to any sanctioned entities or persons.

**Anti-money laundering and the prevention of terrorist financing**

Our distributors and suppliers are prohibited from conducting business with terrorists, criminals or other parties aiming to launder money or to fund terrorism-related activities. Distributors and suppliers must ensure that applicable legislation is followed and that all funds Planmeca Group receives come from legitimate sources.

**Fair competition**

Planmeca Group is committed to fair business. Each distributor and supplier must comply with applicable competition regulations in their day-to-day business activities.

**Conflicts of interest**

Distributors and suppliers must avoid inappropriate conflicts of interest between them and Planmeca Group and any third parties. Actual or potential conflicts of interest must always be avoided. If that is not possible, they must be disclosed and managed properly and in an open manner.

**Gifts, hospitality and entertainment**

Exchanging modest gifts, hospitality, or entertainment is often a customary part of building business relationships. However, giving or receiving extraordinary gifts, hospitality, or entertainment is prohibited in all circumstances, as they might cause a conflict of interest or may be interpreted as bribery. Distributors and suppliers must ensure that no conflicts of interest arise and all applicable laws are followed when they are giving or receiving gifts, entertainment, or hospitality. Distributors and suppliers must pay special attention to and ensure compliance with applicable laws when acting with government agencies and officials.

**Interaction with health care professionals**

Many jurisdictions have specific legislation governing interactions between companies and health care professionals. Distributors must promote our products accordingly, for example, based on their superior quality, pricing, obtained certifications, and any governmental and regulatory approvals. No unethical or illegal communications or marketing practices are allowed. An appropriate business purpose is required for all interactions with health care professionals.

**Data privacy and information security**

Our distributors and suppliers must process personal data in accordance with all applicable data protection legislation and good data processing practices. Information security is a critical success factor and prerequisite for Planmeca Group’s distributors and suppliers. Distributors and suppliers shall continuously improve information security, follow best practices, and ensure the competence of their personnel in information security. Distributors and suppliers are obliged to report, without delay, any actual or potential data privacy or information security incidents that they discover or become aware of, which might consider Planmeca Group.

## Intellectual property, brand and confidential information

We expect our distributors and suppliers to treat our business information with confidentiality. Distributors and suppliers must ensure that they treat all Planmeca Group's proprietary information carefully by not disclosing it to third parties who should not have access to it. Intellectual property rights, including patents, copyright, trademarks, know-how, and designs, must be protected appropriately. Suppliers or distributors shall not act in a manner that would harm the brand of Planmeca Group.

## Labour, human rights and safety

### Child and forced labour

Distributors and suppliers must not employ children below the legal minimum working age. Forced or compulsory labour shall be prohibited in all its forms. Planmeca Group does not accept any type of slavery, modern slavery, forced labour, or human trafficking in our own operations, and we expect the same from our suppliers, distributors, and other business partners.

### Humane treatment

Distributors and suppliers must respect and follow human rights, including providing safe and fair working conditions for their employees. Distributors and suppliers are expected to treat their employees with dignity and to respect human rights in all their operations. Corporal punishment, sexual exploitation, verbal or physical abuse or other kinds of harsh or inhumane treatment shall not be used. Distributors and suppliers shall commit to the elimination of harassment and discrimination based on race, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political view, or union membership, as well as to the elimination of other discriminatory practices in hiring, promotions, access to training, or other employment practices.

### Wages and working hours

Distributors and suppliers shall comply with the ILO principles, local laws and collective labour agreements concerning the wages and working hours of their employees.

### Freedom of association and collective bargaining

Distributors and suppliers are expected to respect the employees' rights to associate freely, to join or not to join labour unions or works councils, to seek representation, and to bargain collectively.

### Occupational health and safety

Distributors and suppliers are expected to comply with applicable legislation and to provide their employees with safe and healthy working conditions. Implementing safety procedures and training systems to prevent occupational injuries and illnesses is required.

### Product safety

Planmeca Group is committed to improving the health and wellbeing of people around the world. Distributors and suppliers are required to follow all applicable regulatory obligations in the medical technology and health care sector. Distributors and suppliers should always prioritise product safety and not act in a manner that can result in a situation, in which the safety of Planmeca Group's employees, clients, or their patients is compromised. In order to guarantee the conformity of Planmeca Group products with applicable standards, the products shall not be modified by a distributor. Distributors and suppliers must ensure that their products and services are developed, manufactured, and provided according to strict quality control standards. Suppliers must also ensure that their products conform with contractual

requirements agreed with Planmeca Group to ensure that Planmeca Group customers only receive products of the highest quality.

## Corporate responsibility

### Environmental sustainability

Distributors and suppliers shall aim to minimise their environmental impact. Distributors and suppliers shall comply with the applicable environmental laws and regulations as well as obtain all necessary permits, licences, and registrations. Distributors and suppliers are also expected to commit to improving the recyclability and circular use of their products as well as to minimising the use of plastic components. Distributors and suppliers are encouraged to certify their operations with the ISO 14001 standard or another system that includes environmental requirements for operations and reporting. If requested, suppliers and distributors shall provide Planmeca Group with data related to sustainability and corporate responsibility, such as life-cycle emissions calculations or data required according to the EU Corporate Sustainability Reporting Directive, the EU Corporate Sustainability Due Diligence Directive or other applicable legislation.

### Waste management

Distributors and suppliers shall aim to minimise waste and maximise recycling by implementing appropriate procedures in their operations. Distributors and suppliers shall ensure that wastewater, solid waste, and air emissions derived from their operations are monitored, controlled, and treated as required by applicable laws prior to their discharge or disposal. Distributors and suppliers are also encouraged to identify and manage all hazardous materials used in their operations.

### Social responsibility and corporate governance

We expect our distributors and suppliers to have a positive impact on the society. Distributors and suppliers must ensure that their companies are governed in an ethical manner. This also includes having appropriate risk management procedures.

## Verification of compliance, whistleblowing, and further information

Planmeca Group or its representatives may perform audits to ensure that distributors and suppliers comply with this Code of Conduct. Such audits may include visits at the premises of a distributors or supplier. Breaches of this Code of Conduct by a distributor or supplier may lead to the termination of the business relationship between the distributor or supplier and Planmeca Group. Distributors and suppliers are expected to provide confidential and safe means for their employees to report their concerns on activities violating this Code of Conduct by the distributor or supplier.

Planmeca Group operates a whistleblowing channel. Each distributor and supplier is obliged to report any breaches or suspected breaches they encounter, regardless of whether they concern the law or this Code of Conduct. In the first instance, you can always contact your Planmeca Group representative. Planmeca Group is prohibited from retaliating against any reporting party for reporting any breaches or suspected breaches concerning Planmeca Group's own actions. Planmeca Group is also prohibited from attempting to prevent any person from reporting information on potential breaches. You can access the whistleblowing channel here: <https://report.whistleb.com/en/planmeca>.

If you have any questions on Planmeca Group's Global Distributor and Supplier Code of Conduct, the Compliance and Corporate Responsibility Programme, or if you are in doubt of the right course of action, you can always contact the Planmeca Group's compliance department by email at [compliance@planmeca.com](mailto:compliance@planmeca.com).

## References

International Labour Organization

[www.ilo.org](http://www.ilo.org)

UN Global Compact Principles

[www.unglobalcompact.org/what-is-gc/mission/principles](http://www.unglobalcompact.org/what-is-gc/mission/principles)

The Universal Declaration of Human Rights

[www.un.org/en/documents/udhr](http://www.un.org/en/documents/udhr)

UN Convention on the Rights of the Child

[www.ohchr.org/en/professionalinterest/pages/crc.aspx](http://www.ohchr.org/en/professionalinterest/pages/crc.aspx)

I, the undersigned authorised representative of the Distributor/Supplier, hereby certify that the Distributor/Supplier accepts and complies with Planmecca Group's Global Distributor and Supplier Code of Conduct.

Full company name:

Corporate identity number:

Place and date:

Name and position:

Signature: