

GLOBAL CODE OF CONDUCT



PLANMECA
GROUP

Introduction



For over 50 years, Planmeca Group has been on a mission to support dental and medical professionals in delivering the best possible treatment experiences to their patients – in line with our slogan: Better care through innovation. All Planmeca Group companies and employees share a passion for innovation and revolutionary technology.

Over 50 years of continuous growth has required determination, innovation, and perseverance – and a touch of courage and fearlessness. But above all, it has required unwavering belief in better patient care and tirelessly working towards it together with the dental and medical community.

As one of the leaders in health care technology, Planmeca Group has a special responsibility in the eyes of the dental and medical community. This also applies to ethics, compliance, and corporate responsibility, including sustainable innovations, uncompromising quality and product safety, as well as ethical business practices.

At Planmeca Group, we believe in conducting our business the right way. Planmeca Group's Global Code of Conduct forms a cornerstone of the Group's Compliance and Corporate Responsibility Programme. All Planmeca Group companies and employees are committed to practising business with integrity, always in accordance with the letter and spirit of the applicable laws.

We thank all our employees for their continued commitment to the Global Code of Conduct of Planmeca Group.

Heikki Kyöstilä

Founder, President and CEO
Planmeca Group

PLANMECA

KAVO

Planmed

Plandent
DIVISION

LM
feel the
difference

HeySmile

PLANMECA
triangle

OPUSDENTAL

Contents

Introduction	1	Regulatory obligations and fair business practices	7	Company assets	10
Our Code of Conduct	3	International trade	7	Confidentiality, business secrets, brand, and intellectual property	10
General principles of business ethics	3	Sanctions and export controls	7	Information security	11
Special role of supervisors	3	Anti-money laundering and the prevention of terrorist financing	7	Other assets	11
Our commitment to making the right decisions	3	Anti-bribery and anti-corruption	8	What is expected of you	11
Speaking up without retaliation	4	Financial reporting and accurate records	8	Data privacy	12
Training and certification	4	Gifts, hospitality and entertainment	8	What is expected of you	12
What is expected of you	4	Third parties	8	Corporate responsibility	13
Health and safety	5	Conflicts of interest	8	Environmental	13
Safe working environment	5	Interaction with health care professionals	9	Social	13
Product safety	6	Interaction with business partners	9	Governance	13
What is expected of you	6	Interaction with government agencies	9	What is expected of you	13
		Fair competition	9	Closing remarks	14
		What is expected of you	9	Programme for compliance and corporate responsibility	14
				Further resources and information	14



Our Code of Conduct

General principles of business ethics

Planmeca Group's Global Code of Conduct is at the core of Planmeca Group's operations, ensuring that everyone at Planmeca Group has the same understanding of the values and principles that guide our daily work. The principles apply for every employee in all our operating countries and Planmeca Group companies. We require all our employees to familiarise themselves with Planmeca Group's Global Code of Conduct and other policies detailing the obligations described herein.

Special role of supervisors

Supervisors at Planmeca Group companies have a special responsibility in ensuring that all employees understand and comply with the Planmeca Group's Global Code of Conduct and all other internal policies and procedures. Supervisors include everyone who have other employees reporting to them. If you are a supervisor, you must act as a role model of ethical behaviour and foster an ethical speak-up culture in your team.

Our commitment to making the right decisions

At Planmeca Group, we are all committed to doing business the right way. We foster an open and low hierarchy culture that enables our employees to bring up any unethical practices and do the right thing. In addition to the Planmeca Group's Global Code of Conduct, we have numerous other detailed policies and procedures to assist our employees in making the right decisions. You can always turn to your nearest supervisor, leadership, or any of the support functions in case you are not sure of the right course of action.

Speaking up without retaliation

All employees are encouraged to report suspected breaches or misconduct to their supervisors. If employees do not feel comfortable doing this, they can always report the matter to a representative of the Human Resources, Legal or Compliance departments, or to a management representative. To foster a speak-up culture and to comply with applicable laws, Planmeca Group operates a whistleblowing channel where reports can also be made anonymously. Each Planmeca Group employee is obliged to report any breaches or suspected breaches they encounter, regardless of whether they concern the law, applicable regulations, our own Global Code of Conduct, or other policies.

Through the whistleblowing channel, all Planmeca Group employees and stakeholder representatives are able to confidentially and anonymously report any witnessed or suspected violations of laws, decrees, regulations or our own Global Code of Conduct. Breaches or suspected breaches can be reported even if the reporting party is not absolutely certain of whether a breach has been committed or not. However, the reporting party must have just cause to suspect that a breach has occurred.

Planmeca Group is prohibited from retaliating against the reporting party for reporting any breaches or suspected breaches. Planmeca Group is also prohibited from attempting to prevent any person from reporting information on breaches.

Examples of cases in which the whistleblowing channel may be used:

- *Failure to comply with laws and regulations*
- *Lack of safety in the working environment*
- *Environmental violations*
- *Violation of privacy or data protection*
- *Conflicts of interest*
- *Cases of financial misconduct*
- *Corruption and bribery*
- *Inappropriate behaviour or harassment*

Access the whistleblowing channel here:

<https://report.whistleb.com/en/planmeca>

Training and certification

All Planmeca Group employees must certify that they have access to the Global Code of Conduct, that they have received, read, and understood it, and that they will comply with the Global Code of Conduct and other Planmeca Group policies for the whole duration of their employment.



What is expected of you

1. Always think before you act and strive to do the right thing.
2. Speak up in case you witness any unethical behaviour.
3. Complete all the required training and familiarise yourself with this Global Code of Conduct as well as any other policies that concern your daily work.
4. If you are a supervisor, consider your special role in fostering an ethical culture at Planmeca Group.



Health and safety

Safe working environment

Planmeca Group promotes a safe, inspiring, and equal working environment. We respect and adhere to human rights, which includes providing safe and fair working conditions for our employees. We do 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 as well.

We make sure our employees have a safe and healthy working environment. We invest in the physical and mental well-being of our employees. We treat our employees equally and comply with the applicable labour laws. Any discrimination, harassment, threats, or insults are not tolerated in any shape or form. Planmeca Group is a violence-free workplace. We aim to ensure the engagement, motivation, and continuous development of our employees.

To ensure safety, employees should never work under the influence of alcohol or drugs. All employees should always follow applicable legislation that concerns the use of alcohol and drugs. Alcohol may be consumed in moderation at company and business events, however, improper use of alcohol is always forbidden.

We value our employees and aim to foster long-term employment relationships with high well-being. We also expect all our employees to provide a safe working environment for their colleagues as well as our business partners and any third parties. All employees must follow the applicable safety policies and be aware of any emergency procedures.

We expect our employees to show appreciation for each other, bear responsibility for their respective roles, and to always act in consideration of others. This leads to a trustful, safe, and interactive working environment and culture.

Examples of inappropriate behaviour in the workplace:

- *Any behaviour that is considered harassment, such as harassment based on a person's ethnic background or sexual harassment*
- *Any type of bullying, insults, or threats*
- *Working under the influence of alcohol or drugs or improper use of alcohol at a business event*
- *Not following the applicable safety procedures*

Product safety

We take responsibility for product safety. Since we are committed to improving the health and wellbeing of people around the world, we follow all applicable regulatory obligations in the medical technology and health care sector in order to ensure a high level of health protection for patients and users. To achieve these objectives, we have a robust system of conformity assessment to ensure the quality, safety, and performance of our medical devices and other products.

Our mission is to produce safe and ergonomic products to improve the daily workflow of dental and medical professionals. Patient safety is a priority for us all over the world. All Planmeca Group employees should always prioritise product safety and not act in a manner that could result in a situation, in which the safety of our clients, their patients, or our own safety could be compromised.

We are committed to long-term research and development as well as close collaboration with health care professionals and leading universities. We focus on sustainable product development and produce technically advanced solutions.

We ensure that our products are developed in accordance with strict quality control standards. Each product is carefully tested before it leaves the factory to ensure that our customers only receive products of the highest quality. We follow rigorous quality and sustainability standards applicable to our operations.

In addition to all applicable global legislation and standards we comply with, we have ISO certifications for various parts of our business, including ISO 13485, ISO 14001, and ISO 9001 certifications.



What is expected of you

1. Keep the working environment safe by treating everyone appropriately and with respect.
2. Follow applicable safety policies and procedures.
3. Do not work under the influence of alcohol or drugs or use alcohol improperly at a business event.
4. Always prioritise product safety.
5. Strictly follow all legal requirements as well as internal quality policies and procedures related to product safety.



Regulatory obligations and fair business practices

Planmeca Group complies with all national and international laws and regulations applicable to its operations. We expect the same from all our business partners. We do not accept any illegal behaviour from our partners and never incite or advise anyone to violate applicable legislation or regulations.

International trade

Sanctions and export controls

We follow applicable national and international trade compliance requirements such as sanctions laws, trade embargoes and other export control laws, including any sanctions lists and programmes issued by the European Union, the United States of America, the United Kingdom, and the United Nations.

Each individual employee is responsible for ensuring that applicable legislation is followed. This includes ensuring that third-party due diligence measures required by Planmeca Group, including sanctions and adverse media screenings, are conducted according to applicable onboarding procedures for suppliers, distributors, and end-user clients.

Examples of sanctions and export controls:

- *Sanctions mean the restriction or suspension of economic relations with a certain country, private individual, or legal entity.*
- *Export controls usually restrict the trade of dual-use items, i.e. products that can be used for both civilian and military applications.*
- *Any sanctions or export control programmes and legislation by the European Union, the United States of America, the United Kingdom, and the United Nations.*

Anti-money laundering and the prevention of terrorist financing

Planmeca Group companies and employees are prohibited from conducting business with terrorists, criminals, or sanctioned parties aiming to launder money or to fund terrorism-related activities. It is always important, and a responsibility of each employee,

to ensure that applicable legislation is followed and that any funds we receive come from a legitimate source. Dealing with government entities or politically exposed persons poses a heightened risk of money laundering. All employees must pay special attention to such transactions for any signs of conduct that could increase the risk of money laundering, such as corrupt practices.

Examples of money laundering and terrorist financing:

- *A third party attempts to circulate criminally obtained money through legal banking system with the aim of concealing the true origin of the funds.*
- *With terrorist financing, the origins of the funds may or may not be legal, but funds are raised or collected for a terrorist group or other similar purpose.*

Anti-bribery and anti-corruption

Planmeca Group prohibits all forms of bribery and corruption in all circumstances. No employee should ever offer to pay or accept any bribes, kickbacks or facilitation payments, or engage in other corrupt practices. This also applies to using any third parties, such as distributors, agents or consultants, to facilitate bribery or other corrupt practices. All business decisions within the Planmeca Group must be made without any improper influence from third parties. We follow all applicable anti-bribery legislation, including legislation in all EU countries, the US Foreign Corrupt Practices Act and the UK Bribery Act.

Examples of corruption:

- *A supplier of goods or a service provider gives an employee financial compensation, a gift of excessive value or other benefit in an effort to influence a procurement decision.*
- *An employee gives or receives gifts in cash.*
- *A government employee or politician takes money in exchange for services.*

Financial reporting and accurate records

Financial integrity is of vital importance to Planmeca Group. All employees must record and report all financial information accurately and follow internal accounting controls. Any record falsification as well as not making proper and complete disclosures in a timely manner is strictly prohibited. This enables us to follow applicable laws and make correct and responsible decisions in respect of our business operations.

Examples of financial misconduct:

- *An employee, a supervisor, or a management member has engaged in questionable accounting practices.*

- *A supervisor or management member asks an employee to falsify company records.*
- *An employee reports travel expenses or other expenses under false pretences.*
- *Embezzlement of company funds.*

Gifts, hospitality and entertainment

Exchanging modest gifts, hospitality, or entertainment is often a customary part of building business relationships. However, giving or receiving excessive gifts, hospitality, or entertainment is prohibited in all circumstances, as they might cause a conflict of interest or may be interpreted as bribery.

All Planmeca Group employees must ensure that no conflicts of interest arise and all applicable laws are followed when they are giving or receiving gifts, entertainment, or hospitality. Many jurisdictions have legislation concerning gifts, hospitality, and entertainment especially related to government officials and health care professionals. Employees must pay special attention to and ensure compliance with the applicable laws and internal policies when acting with government agencies and health care professionals.

In no circumstances shall a Planmeca Group employee offer any gifts, hospitality, or entertainment with the intent of influencing a specific business decision of any third party.

Examples of extraordinary gifts:

- *Gifts of excessive value, which are not proportionate to the occasion or not in line with the policies of Planmeca Group or third-party policies*
- *Cash or cash equivalents*
- *Any gift that causes or appears to cause a conflict of interest or that could be considered as a bribe*

Third parties

Conflicts of interest

Our decisions are always made in the best interest of Planmeca Group. We avoid conflicts of interest between the employer and the employees or 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 in an open manner.

A conflict of interest exists when the interests of an employee conflict with the interests of Planmeca Group. Any relationships or interests that could lead to impaired decision-making capabilities or jeopardize Planmeca Group's business must be avoided.

Interaction with health care professionals

In our normal course of business, we regularly interact with health care professionals. Many countries have specific legislation governing the interactions between companies and health care professionals, which requires compliance from all Planmeca Group employees working in that specific jurisdiction.

We promote our products, among other appropriate qualities, based on their superior quality, pricing, obtained certifications, and any governmental and regulatory approvals. All communications with health care professionals must be based on the above and no unethical or illegal communications or marketing practices are allowed. An appropriate business purpose is required for all interactions with health care professionals.

Interaction with business partners

We require all our suppliers and distributors to accept Planmeca Group's dedicated Global Distributor and Supplier Code of Conduct. Our Global Distributor and Supplier Code of Conduct states the legal, ethical, environmental, and social responsibilities of our partners. Any breaches by a supplier or distributor may lead to the termination of the business relationship.

All Planmeca Group employees should ensure that our suppliers and distributors accept, are aware of the obligations of, and comply with our Global Distributor and Supplier Code of Conduct.

Planmeca Group employees, who interact with the suppliers and distributors or oversee their selection, must ensure that all suppliers and distributors are reputable and comply with our high ethical standards. Suppliers and vendors should always be chosen based on the quality and pricing of their products and services.

Employees also need to ensure that any necessary third-party due diligence procedures regarding suppliers and distributors, such as sanctions and adverse media screenings, are followed. By following these steps, we can ensure that Planmeca Group's reputation is protected and that the high quality of our products remains intact.

Interaction with government agencies

We are committed to following all applicable laws, including in respect of any governmental information requests, inspections, audits, and investigations. Planmeca Group employees should always fully participate in such audits and fully cooperate with governmental officials as required by applicable laws.

It is always important to notify the legal department of all information requests, inspections, audits, or investigations.

Fair competition

We are committed to fair business. Each employee must ensure that Planmeca Group companies comply with applicable competition laws in our day-to-day business activities. A conduct that distorts competition is not only illegal but also weakens the business efficiency. Potential penalties and the reputational risk related to infringements are significant. Infringement of competition laws also causes significant financial risks.

All Planmeca Group employees are required to comply with all applicable competition laws. Supervisors must ensure that all employees understand the main applicable competition laws and why it is important to comply with them.

Examples of what is always prohibited with competitors:

- ***Price cooperation and price cartels***
- ***Bidding cooperation and bidding cartels***
- ***Dividing markets or customers***
- ***Collective boycotts***
- ***Restriction of production***
- ***Exchange of confidential information***

What is expected of you

1. Prior to selling any products or services, confirm that the distributor and end-user clients have been screened for sanctions and that we know our customers.
2. Before products are sent to clients, ensure that export control legislation is followed.
3. Pay attention to any unusual third-party behaviour that could show signs of an illegal activity, such as money laundering, bribery, or corruption.
4. Act ethically and follow applicable laws and Planmeca Group policies when interacting with third parties.
5. Always act in the best interest of Planmeca Group.



Company assets

Confidentiality, business secrets, brand, and intellectual property

We treat business information and trade secrets with confidentiality. Planmeca Group companies operate in a competitive market, and each employee must ensure that they treat all Planmeca Group proprietary information carefully by not disclosing it to third parties who should not have access to it.

At Planmeca Group, we foster innovation, and intellectual property rights form a cornerstone of our business. Intellectual property rights, including patents, copyright, trademarks, know-how, and designs, must be protected appropriately by all employees. All employees must also protect the Planmeca Group brand by always conducting themselves ethically, including in social media.

We are committed to treating customer information and business secrets with confidentiality. We maintain the secrecy of confidential information entrusted to us regarding the operations, personnel, customers, and business partners of our own company or any of our stakeholders, and will not disclose this information to unauthorised parties.

Examples of confidential information:

- *Information that is confidential due to an agreement with a third party*
- *Planmeca Group's business strategies*
- *Planmeca Group's know-how and trade secrets*
- *Customer and sales lists, including our pricing*
- *Supplier lists and supply chain costs*
- *Personal data*

Information security

Information security is a critical success factor and a prerequisite for Planmeca Group's operations. In order to continuously improve the information security, best applicable practices will be followed and personnel competence and participation in the development of information security will be ensured. Planmeca Group's Information Security Policy applies to all employees and is extended to suppliers, subcontractors, and other stakeholders, as appropriate.

Anyone working for a Planmeca Group company or otherwise acting on behalf of the companies is obliged to act in accordance with the applicable Information Security Policy. All employees and other persons acting on behalf of the Planmeca Group companies are obliged to report, without delay, any actual or potential information security incidents that they discover or become aware of as well as any actions or events that violate the policies or instructions of Planmeca Group companies.

Other assets

All Planmeca Group employees must protect all company assets against any damage, theft, or any improper use. Company assets include all company properties, supplies and equipment, such as the company's computer network, mobile phones, computers, other technological resources, office supplies, workstations, company vehicles, as well as company facilities and premises.

Company assets must be used for legitimate business purposes and in accordance with Planmeca Group's policies and procedures.



What is expected of you

1. Protect Planmeca Group's trade secrets.
2. Follow all Planmeca Group's information security policies, including creating safe passwords and using VPN connection according to Planmeca Group's instructions.
3. Always pay attention to information security, especially when working remotely and travelling for work.
4. Be aware of cyber attacks, such as malware, phishing, password attacks, URL manipulation, and inside threats.
5. Report any information security incidents to the IT department.
6. Treat all Planmeca Group assets with care.
7. Act ethically and with respect to others in social media.

Data privacy

We process personal data in accordance with applicable data protection legislation and with good data processing and data management practices. The processing of personal data, including the products and services of Planmeca Group companies, must be carried out in a planned and documented manner, always considering data protection aspects.

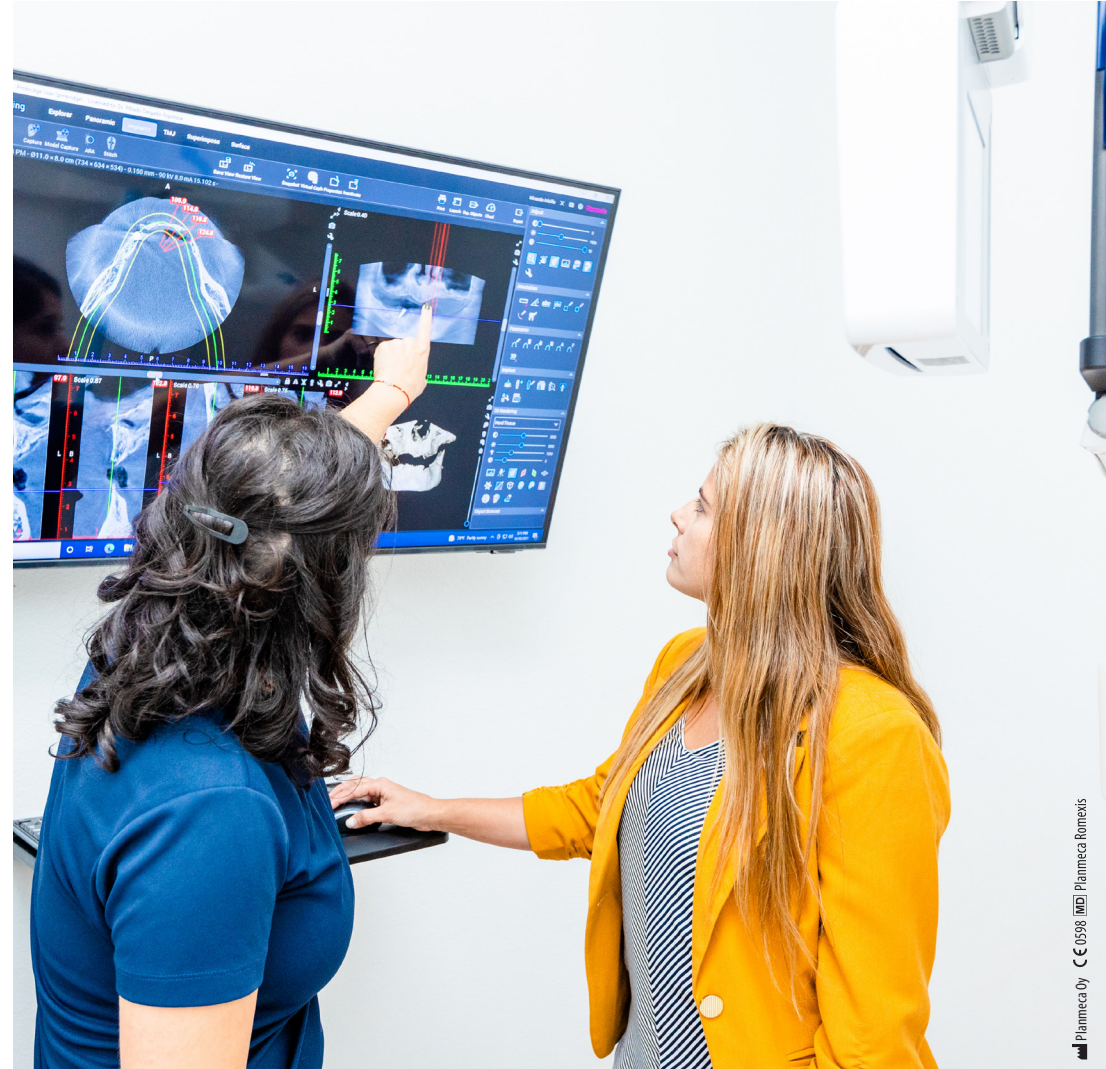
The data protection legislation requires systematic processing and adequate protection of personal data, informing about the processing of personal data, taking care of the rights of persons that are subject to data processing, as well as the ability to detect and report data protection incidents.

Data security is an essential part of data protection. Both data protection and data security policies are complemented by more detailed policies, guidelines, and standards. The overall responsibility for the lawful processing of personal data and the implementation of data protection, as well as for the protection of other confidential information, lies with the top management of Planmeca Group companies. Supervisors must ensure the adequacy of their subordinates' competence, instructions, as well as appropriate working tools and methods.

All employees and those working on behalf of Planmeca Group companies are obliged to act in accordance with data protection legislation. Every employee is also obliged to report any observed potential or actual data protection incidents immediately.

Examples of personal data:

- *Personal data means all data related to an identified or identifiable natural person; an identifiable person can be identified, directly or indirectly, in particular by reference to identification data such as name, personal identification code, location data, online identification data or one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.*



What is expected of you

1. Familiarise yourself with and follow Planmeca Group's Data Protection Policy.
2. Always minimise the use of personal data.
3. Process the personal data according to good data processing practices and delete personal data after it is not needed.
4. Prior to implementing or developing any new products, processes or solutions, contact the Planmeca Group Data Protection Office to conduct any required data privacy impact assessments.

Corporate responsibility

Environmental

We minimise our environmental impact and are committed to minimising the environmental impact throughout our supply chain. We comply with all mandatory requirements arising from applicable legislation regarding the environment and environmental protection.

We also consider the environment in our production procedures. We strive to minimise our impact on climate change and promote the sustainable use of natural resources in cooperation with our stakeholders. We support and improve circular economy through our future-proof and sustainable product development.

Social

We contribute to the surrounding society. We make sure that our communication is reliable, transparent, and comprehensive. We contribute to scientific research and are committed to increasing the quality and availability of dental education worldwide to improve the quality of dental care.

Additionally, youth employment is a particular focus area for us. We also contribute to different charitable purposes, especially to improve the health and wellbeing of youth and children. We encourage all employees to take initiative regarding charity and social responsibility.

Governance

We have ethical corporate governance. We ensure that our company is governed in an ethical way. This includes using accurate accounting methods as well as having legal and compliance policies in place to manage risks appropriately.



What is expected of you

1. Take environmental aspects, such as emission reductions, into account in your daily work. This applies to all employees whether they work in production, procurement, sales, product development, research, support services, or any other department.
2. Follow all Planmeca Group policies and procedures and act ethically and according to the letter and spirit of any applicable laws.
3. Maintain knowledge regarding sustainable practices and product development within your field of work.

Closing remarks

Programme for compliance and corporate responsibility

The Compliance and Corporate Responsibility Programme of Planmeca Group has the full support of the shareholders, board of directors, and management group of Planmeca Group. Ethical business conduct by all Planmeca Group employees is of utmost importance to the Group's shareholders, board of directors, and management group, and they thank all employees for making ethical behaviour a priority at Planmeca Group.

Further resources and information

If you have any questions on the Global Code of Conduct of Planmeca Group, the Compliance and Corporate Responsibility Programme, or if you are unsure of the right course of action, you can always contact the compliance department.

Atte Sorvettula

Head of Compliance & Corporate Responsibility

Phone: +358 20 779 5322

atte.sorvettula@planmeca.com

General email address of compliance department

compliance@planmeca.com

In case you wish to report a case on the Planmeca Group's Whistleblowing Channel, please find the link below:

<https://report.whistleb.com/en/planmeca>



PLANMECA

KAVO

Planmed

Plandent
DIVISION



HeySmile

PLANMECA
triangle

OPUSDENTAL 

PLANMECA
GROUP

Asentajankatu 6 | 00880 Helsinki | Finland | Tel. +358 20 779 5500 | www.planmeca.com

