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a-dec

A-dec Integrity

Code of Business Conduct and Ethics



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A Message From Our CEO



From our humble beginnings, A-dec has emerged as one of the most respected names in the dental industry. The story of A-dec's success is a story of dedication, innovation and creative solutions for our customer's. ***At A-dec, we are committed to doing the right thing.***

This Code of Business Conduct and Ethics (Code) and The A-dec Way principles apply to all A-dec employees, our Board of Directors and anyone who conducts business on A-dec's behalf globally. We also expect our business partners to share our ethical commitments and standards. The Code and The A-dec Way do not address every possible business situation we may encounter but provide a framework for decision-making to help us to live up to The A-dec Way.

Defining our culture ensures that our decisions and actions will reflect our shared values, no matter what challenges we may face. A-dec's Board of Directors and our entire executive management team are committed to the values reflected in the Code and The A-dec Way, and we are excited to share them with you. As employees or business partners of A-dec, it is important that you are familiar with this Code and The A-dec Way and share our commitment to our core values. We encourage you to discuss any concerns you may have with your supervisor or manager, if you are an employee, or to reach out to a member of our executive management team.

Our vision here at A-dec is to make A-dec products the preferred choice by providing a superior customer experience and our mission is to provide a quality environment where people work together for the betterment of dentistry worldwide. I truly appreciate your commitment to A-dec, to bringing our vision and mission to life and to our focus on acting ethically and legally in everything we do.

Sincerely,

Scott Parrish

CEO

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The A-dec Way

The A-dec Way is a written expression of A-dec's operational philosophy. The first principle, concern for people, summarizes how A-dec chooses to operate, and holds true whether the people referred to are employees, doctors, dealers, or suppliers. This forward-thinking philosophy governs all aspects of the Company, and sustains our products, processes, policies, and culture. The A-dec Way describes beliefs and principles that are taken seriously and demonstrated at A-dec daily.

The 15 principles are listed here:

01 Concern for people

02 Provide for opportunity and assist in self-development

03 Provide an atmosphere encouraging self-satisfaction and pride

04 Encourage team effort

05 Maintain complete fairness, honesty, and integrity

06 Maintain open, consistent, and regular communication

07 Encourage public service

08 Encourage creativity

09 Commitment to productivity and quality

10 Maintain consistency

11 Dedication to Improvement

12 Keep things simple and basic

13 Build on a basis of "need"

14 Attention to detail

15 Conserve resources

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We Lead With Honesty and Integrity

The concepts of honesty and integrity are central to A-dec and are embodied in the fifth principle of The A-dec Way.

Honesty and integrity are essential to our success, and these principles create the framework for this Code. It is critical that employees undertake all actions relating to A-dec in an ethical, honest, lawful, and candid manner. Employees are expected to make commitments carefully and keep them faithfully in order to build trust. These expectations apply to all interactions and transactions, including those with co-workers, supervisors, suppliers, customers, guests, and other business partners.

A-dec places the highest priority on maintaining an atmosphere of trust and open communication in which ideas can be exchanged and differences resolved in a productive and respectful manner.

Simple, direct and honest communication is a fundamental part of what keeps A-dec a positive workplace where innovation and excellence can flourish. A-dec seeks to ensure that employees feel free to raise issues and concerns and to share their thoughts with supervisors, managers, Global People & Culture (GP&C), or through any of the other resources described in this Code. We believe this commitment is critical to ensure excellence is maintained throughout the Company.

Doing the Right Thing

If you are ever unsure about whether you are doing the right thing, ask yourself:

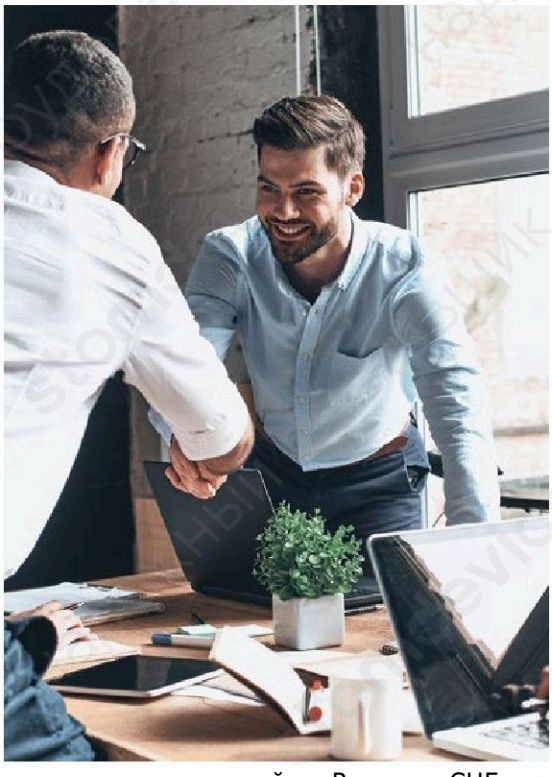
- Does it feel right?
- Is it legal?
- Is it consistent with the Code, the A-dec Way and Company policy?
- Would you feel comfortable if your decision or actions were made public?

If the answer to any of these questions is no, stop and ask for guidance using any of the resources described in this Code.

Our Quality Policy

At A-dec, commitment to quality is everyone's responsibility. We strive to create a superior customer experience at every touchpoint by conforming to requirements with a continuous improvement mindset. A-dec's commitment to quality can only be achieved when every employee takes to heart A-dec's Quality Policy.

To learn more about A-dec's Quality Management System in application check out the A-dec Quality Manual (QM-001) in the Operational Procedure Library or contact a member of the Quality Assurance department.



Our Sustainability Mission

Our sustainability mission is to adopt sustainable business practices to minimize our impact on the environment.

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A commitment to conserving resources and keeping things simple and basic have been a part of The A-dec Way from the very beginning.

These principles provide the foundation for our sustainability practices. Sustainability has become a customer expectation and a competitive factor in business. However, the most compelling reason for our commitment to sustainability is that it is the right thing to do. With that in mind, A-dec is committed to implementing best practices in our energy use and waste management.

Conflicts of Interest

A-dec requires that all employees and business partners conduct Company business according to the highest ethical standards. Activities that create, or appear to create, a conflict between the interests of A-dec and your interests (including the interests of your family members or close friends) are not permitted.

Employees are required to promptly disclose any actual or potential conflict of interest to GP&C or the General Counsel so that the Company may assess the actual or potential conflict and take any necessary corrective action.

Members of the Executive Team (VP title and above) and members of the Board of Directors, who are faced with a potential conflict of interest, must disclose it to the General Counsel for review. Additional steps, including in some instances approval by the CEO, President, or the Board of Directors may be required to resolve the matter.

Here are some examples of common potential conflicts of interest employees may face:

- Using Company resources, including the time of fellow employees, to advance your personal interests or business
- Having a second job that conflicts with your ability to effectively perform your job duties for A-dec
- Holding a significant financial interest in a competitor, supplier or other business partner of A-dec without the prior authorization of our CEO, President or General Counsel
- Awarding or directing business to or doing business with a business owned by you, a family member or close friend without the prior approval of the VP of GP&C or the General Counsel
- Accepting gifts or hospitality beyond what is customary and acceptable under this Code and Company policy

For more information, employees should review the employee handbook or other employment policies for their location.



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We Treat Everyone with Respect and Dignity

We Believe in Communicating Openly

We believe in open communication and the expression of diverse and different ideas. This is embodied in the fourth and sixth principles of The A-dec Way, which say that an exchange of ideas usually brings a better decision and that the maintenance of open, consistent and regular communication is critical to how we do business. We encourage our employees and business partners to come forward with concerns and encourage each other to share ideas that contribute to A-dec's success. Employees should review our Conflict Resolution/ Open Door Policy found in the U.S. Employee Handbook or the employee handbook and other employment policies for their location for additional guidance.

We Believe in Embracing Inclusion and Diversity

A-dec operates in several countries and does business in more than 100 countries globally. We are committed to creating and maintaining a culture that is inclusive and welcomes a diverse range of cultures and beliefs. A-dec is committed to allowing each employee to meet their full potential without being impeded by discrimination. All employment decisions at A-dec must be made without unlawful discrimination on the basis of race, color, religion, gender, gender identity, sexual orientation, national origin, age, physical or mental disability, marital status, veteran status, citizenship, or any other basis that is protected by federal, state or local laws.

Preventing Harassment and Discrimination

We treat everyone with respect and do not tolerate harassment in our workplace or business relationships. If you experience or witness harassing behavior, please report it using the resources identified in this Code.

For more information on preventing harassment and discrimination in the workplace, employees should review the employee handbook and other employment policies for their location.

> "Harassment" is any unwelcome conduct—whether physical, verbal or sexual—that has the purpose of creating an intimidating, hostile or offensive environment.

Ensuring Health and Safety

A-dec places the highest priority on workplace safety. As part of that commitment, A-dec seeks to provide employees and visitors a safe and healthy work environment free of the effects of illegal or improper use of drugs and alcohol. Accordingly, the illegal or improper use, abuse, possession, distribution, manufacture, dispensation, purchase, transfer, or sale of alcohol, illegal drugs, inhalants, or other controlled substances is strictly prohibited. Employees should review our Drug and Alcohol Use Policy found in the U.S. Employee Handbook or the employee handbook and other employment policies for their location for additional guidance.

In addition, A-dec does not tolerate any action that threatens people, the Company or our property. Harassment, threats, physical attacks, possession of any weapon on Company property, or any behavior that would make others feel unsafe are prohibited. Additional guidance for employees may be found in the U.S. employee handbook or the other employment policies for that employee's location.

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Human Rights and Prohibition against Human Trafficking

We respect human rights and are committed to humane working conditions globally. Any conduct by our employees or business partners that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, any acts associated with modern day slavery, or any other human rights abuses is strictly prohibited. A-dec expects that our employees, agents and all business partners will comply with our policy prohibiting human trafficking.

A-dec's human trafficking policy specifically prohibits:



- Trafficking in persons.
- Procuring commercial sex acts.
- Use of forced labor.
- Denial of access to an employee's identity or immigration documents.
- Use of misleading or fraudulent practices during the recruitment process or offering of employment.
- Charging employees recruitment fees.
- Failing to provide return transportation or pay cost of return transportation at end of employment under certain circumstances.
- Providing housing that fails to meet host country safety standards.
- Failing to provide an employment contract or work document required by law.

A-dec's policy against human trafficking is consistent with the United States Government's policies, which are set forth in federal regulations and contract clauses, including Federal Acquisition Regulation (FAR) 52.222-50.

Political Activities

All partisan political activity must take place on your own time and expense and not on Company property. You should never pressure colleagues or our business partners to support a particular cause or candidate. If your role involves engagement with government officials or lobbying it is your responsibility to understand and comply with applicable laws.

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We Encourage a Speak-up Culture

A-dec's Code requires you to come forward anytime you believe there has been a violation of this Code, other Company policies or the law.

When you speak up, we listen and follow up. Compliance concerns raised in good faith are promptly investigated. If our investigation indicates there is a problem, we will address it, and we prohibit retaliation.

A concern is raised in good faith if you believe that the report is accurate based on the information available to you. We do not expect or want employees or business partners to conduct their own investigation of a compliance concern before reporting the concern through the resources described in this Code.

Remember! Here you have a voice.

No Retaliation

The Company takes seriously its responsibility to ensure that those who report compliance concerns or participate in an investigation are not subject to any form of retaliation. Employees who retaliate or attempt to retaliate against anyone who reports a concern in good faith or participates in an internal investigation are subject to discipline up to and including termination of employment. Employees who believe they have experienced retaliation for raising a compliance concern should report it immediately using the resources identified in the Code.

Retaliation of any kind against an employee for raising a concern regarding discrimination or inappropriate or unsafe conduct or conditions, against any person who cooperates in an investigation of such concerns or against any person who exercises any other employment related right, is strictly forbidden.

Remember! You also have a responsibility to speak up when you see or suspect unlawful, unethical or fraudulent activity; questionable accounting or auditing matters; or any other violation of the Code.

Seeking Guidance and Reporting Concerns

It is important to raise questions about the Code or concerns about conduct you believe violates the Code, other Company policies or the law. If you have a question or concern, including a concern about our business partners, raise it right away. The following resources are available to answer your questions and address your concerns:

1. Your Supervisor / Manager

   Employees are always encouraged to bring questions or concerns to your supervisor / manager or another member of management with whom you feel comfortable speaking.

2. Global People & Culture

   Our GP&C representatives are available to help and to provide guidance about employee workplace concerns.

3. A Member of Our Executive Team

   You can contact the General Counsel or any member of our Executive Team for guidance or to raise concerns.

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Supervisors/Managers – You have additional responsibilities to implement and live our values by:

- Acting as a role model and leading with honesty and integrity
- Encouraging our speak up culture where employees and our business partners feel comfortable raising concerns and never allowing retaliation
- Escalating compliance reports and appropriate

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4. Our A-dec Integrity Hotline

If you feel uncomfortable discussing your questions or concerns in person, or if you are concerned that your supervisor/manager or other member of management may be involved, our A-dec Integrity Hotline offers two easy options for you to report ethics and compliance concerns via phone or online. The reporting services are available 24-hours a day, 7 days a week. Anonymous reporting is available where allowed by law, and you are able to report in your local language. You may report issues online at: a-dec.ethicspoint.com. You may also call 1-866-291-8199 toll-free in North America to speak with a representative, who will help you make a report. Toll-free numbers for other regions are available at a-dec.ethicspoint.com.

Legal Violations and Accounting Standards Violations

Certain concerns should be immediately escalated to members of our Executive Team. If you believe a violation of law has occurred, contact our General Counsel right away. If you believe a violation of our accounting policies or controls has occurred, contact our VP/CFO and General Counsel right away.

Investigation and Enforcement

We seek to handle reported compliance concerns in a discreet and sensitive manner. Our objective is to conduct meaningful and effective investigations, and we expect our employees and business partners to cooperate fully in this process.

Violations of our Code and the law are taken very seriously and may result in disciplinary action up to and including termination of employment or termination of your business relationship with A-dec. Violations of law could also lead to civil or criminal liability for the individuals involved and A-dec. Members of the Executive Team and leaders at all levels are responsible for monitoring and enforcing the Code within their areas of accountability. If you observe or learn of a situation which you believe may violate or lead to a violation of this Code or the law, report the concern using the resources described above.



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We Conduct Business and Compete Legally, Fairly and Honestly

Compliance with Laws

A-dec has operations in multiple countries around the world, and we expect our employees and business partners to comply with applicable laws and regulations in all locations where we do business.

Bribery and Corruption

As a global company, A-dec is subject to several laws prohibiting bribery and corruption, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. All A-dec employees and business partners are expected to comply with these laws.

As part of our anti-bribery and anti-corruption compliance program, employees and business partners may not:

- Offer or promise to pay anything of value, including bribes, kickbacks, pay offs, or unapproved gifts or hospitality to any government official.
- Accept bribes, kickbacks or improper gifts or hospitality from any third party.
- Pay bribes to anyone, anywhere, for any reason.
- Pay facilitation payments.
- Engage in money laundering.

Employees should review our Anti-corruption Policy for more information.

If you become aware of or suspect any violation of our policies prohibiting corruption and money laundering, notify the General Counsel immediately.

Keeping Accurate Accounting, Financial and Other Records

It is important that all employees maintain accurate, detailed records of all business transactions to help the Company maintain accurate books and records. Maintaining accurate books and records helps us to detect or prevent the giving or receiving of improper payments or benefits. It is never permissible to misrepresent the amount, purpose or nature of any expenditure. Knowing or intentional misrepresentations are always prohibited, and you should never seek to circumvent our internal controls.

It is never permissible to offer a payment, or anything else of value, to a government official in order to influence a business decision or outcome.

Remember! Government officials include:

- Government employees
- Employees of a business owned, or partly owned, by the government
- Candidates running for political office and elected officials
- Customers, suppliers or any other third party working on behalf of the government
- Public international organizations, like the UN

Remember! A bribe is anything of value given to influence a business decision or outcome or to gain some other improper advantage.

Examples of bribes may include:

- Cash payments
- Improper gifts
- Offers of employment or internships
- Excessive travel or entertainment
- Favors for family members or friends

Facilitation payments are small, infrequent payments made to expedite the performance of routine government actions, such as the issuance of work permits or visas or to pass through immigration.

Employees and business partners who follow our policy and do not pay a bribe or facilitation payment will not suffer any adverse consequence, even if that refusal results in the Company losing business.

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Documents and records must be retained in accordance with the law and the Company's internal record retention guides.

All cash, bank accounts, investments, and other assets must always be recorded on the Company's official books. Bank accounts may only be opened or closed with the written approval of the CEO, President or VP/CFO. Payments should never be made with the intention or understanding that any part of the payment is to be used for any purpose other than what is described in the supporting documentation for that payment.

If you become aware of records that may be inaccurate, notify the VP/CFO immediately.

Money laundering is the concealing of illegally gained funds or efforts to make illegally gained funds appear legitimate.

Be aware of and report warning signs, such as overpayments accompanied by a request for a refund to a different account or a request for payment to someone that is not a party to a contract.

Gifts and Hospitality

A-dec employees may not give or accept inappropriate gifts, travel or entertainment from any actual or potential business partners, including suppliers, dealers and customers, or any other third party.

Business courtesies, such as gifts, travel and entertainment, may be appropriate in certain circumstances, but should never be used or appear to be used to influence a business decision or outcome.

In order to be **appropriate**, business courtesies, such as gifts, travel and entertainment, must:

- Be reasonable and customary
- Be infrequent
- Be unsolicited
- Be given or received for a legitimate business purpose
- Not be extravagant
- Not give an impression that the gift, travel or entertainment will influence a business decision or outcome
- Not be given or received as a bribe or kickback
- Comply with law and Company policy

A legitimate business purpose may include:

- Promoting or explaining a Company product or service
- Attending an event to build or maintain a business relationship for the Company's benefit

Gifts of cash or cash equivalents, such as gift cards, are never appropriate and are always prohibited.

In addition, **gifts to and entertaining of government officials are always prohibited unless you obtain the prior written approval of the General Counsel**. If you interact with government officials and have questions about business courtesies, please contact the General Counsel. Remember that "government officials" include government employees; employees of a business owned, or partly owned, by the government; candidates running for political office and elected officials; customers, suppliers or any other third party working on behalf of the government; and public international organizations, such as the United Nations or the Red Cross.

In general, gifts or hospitality valued at more than $100 USD are not appropriate and should be surrendered to GP&C. Vendor or customer sponsored travel is generally not appropriate and must be approved by your VP.

In order to avoid a potential or actual conflict of interest, employees should not personally benefit from their position or contacts with business partners. Employees are prohibited from accepting gifts, travel or entertainment on behalf of their family or friends, that they would be prohibited from accepting themselves.

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Any gifts received in the course of employment must be appropriate as defined in this Code and, in addition, **employees should follow the guidelines below:**

- **If a gift** received by or offered to an employee cannot be tactfully returned or refused without harming the customer or vendor relationship, the gift should be turned over to GP&C. Gifts surrendered to GP&C are generally raffled at company events or donated.
- **Inexpensive, promotional or branded items**, such as calendars, scratch pads, pens or pencils provided by business partners are generally appropriate and may be accepted.
- **Perishable gifts** of nominal value are generally acceptable and should be shared with your team.
- Before attending an entertainment event, be sure to obtain **your supervisor or manager's and your VP's approval**. Remember there must be a legitimate business purpose for the event.
- Offers of **discounts** on purchases of goods or services are generally not acceptable unless made available to A-dec employees generally and approved by GP&C management.



- If appropriate as defined above, it is generally acceptable for vendors or customers to extend **meal purchases** to employees in the course of an on-going business relationship. These courtesies should be reciprocated by A-dec employees so that expenses of this nature are shared.

If you are offered, gifts, travel or entertainment and are unsure how to proceed, ask!

Note that the Company is also subject to certain obligations relating to gift reporting under the Sunshine Act. If you have questions, please contact our Regulatory Team.

Any exception to our Gifts and Hospitality Policy must be approved by the Legal Department.

Fair Competition

A-dec respects and is committed to compliance with antitrust and competition laws in the United States and abroad. Complete fairness, honesty and integrity is the fifth principle of The A-dec Way and is core to how we conduct business in the marketplace. Antitrust and competition laws regulate how we behave in the markets we serve and apply to our dealings with customers, suppliers and competitors.

Certain activities are always prohibited. When you are interacting with **competitors:**

- **Do not** discuss or agree on price or output of competitive products.
- **Do not** discuss or share competitively sensitive business information including information on future or current pricing, discounts, output, or inventory levels.
- **Do not** agree to allocate markets, customers or suppliers.
- **Remember** that there is no such thing as an "off-the-record" conversation.
- **Remember** that many antitrust violations take the form of an agreement with competitors—if a competitor attempts to engage you in a conversation about a prohibited topic, immediately stop the conversation and consult with the General Counsel.

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When you are interacting with **customers**:

- **Do not** attempt to influence the minimum or maximum price at which our customers sell our products.
- You can, of course, discuss the price **we** will sell **our** products to **our** dealer. What you may not do is discuss, encourage or cajole them into a particular price. It must remain their decision.
- Agreeing to deal with a single dealer in a particular region and limiting sales to other dealers can raise antitrust and competition law considerations in some areas but not in others. All exclusive dealing arrangements must be discussed with and approved by the General Counsel prior to any agreement with a dealer.

Government Contracting

Interactions with government customers have additional obligations and requirements. For example, A-dec's contracts with the U.S. Federal Government are subject to federal regulations and contract clauses addressing the sourcing of components from foreign manufacturers, and failure to comply with these regulations can result in significant penalties. Because of this, all foreign sourcing for end items sold to the U.S. Federal Government must comply with our applicable policies.

Did you know that many FCPA enforcement actions involve bribes to obtain or retain government contracts? It is important to always follow applicable anti-corruption laws and the guidelines set out in this Code when interacting with government officials.

If you are involved with the government—for example involvement in bids, tenders or contract negotiations—it is your responsibility to understand the applicable statutory, regulatory and contractual requirements, including the requirements under the False Claims Act and Procurement Integrity Act. You should never make unauthorized or incorrect charges or submit inaccurate information regarding costs or pricing in your interactions with the government.

In addition, we must be diligent in requiring that consultants, resellers and other third parties who interact with governments on our behalf meet our qualification and performance standards, undergo appropriate due diligence and understand our expectations for ethical business conduct. Always involve the General Counsel when engaging a third party that may interact with the government on our behalf.

Interactions with Healthcare Professionals

A-dec employees interact with healthcare professionals in many aspects of our business. In general, a healthcare professional is any individual or entity that is, directly or indirectly, involved in the delivery of healthcare that can purchase, recommend or use A-dec products. Relationships with healthcare professionals are regulated and strictly enforced across the globe, and A-dec is committed to complying with all laws regulating interactions with healthcare professionals, such as the Sunshine Act.

In many countries, healthcare is run by or subsidized by the government, and therefore, healthcare providers are deemed to be government officials and health clinics and hospitals are deemed to be government entities, so our policies regarding interactions with the government apply. A-dec and our business partners do not use interactions with healthcare professionals to improperly influence business decisions or recommendations relating to A-dec products.

Trade Compliance

We are committed to complying with all import and export laws and regulations in the countries where we do business. Both import and export activities generally require certain documentation to be filed and certain taxes and fees to be paid. Be sure to involve our Trade Compliance team when engaging in international trading activity.

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In addition, we are also required to comply with sanctions and embargo programs in certain countries where we do business, such as the sanctions administered by the U.S. Office of Foreign Assets Control (OFAC). These programs restrict our ability to deal with designated individuals, entities, countries, orterritories.

We also comply with U.S. anti-boycott laws and our employees and agents are prohibited from supporting or cooperating with a boycott of another country that is friendly to the U.S. A-dec must promptly report any request to support or participate or cooperate in an unsanctioned boycott to the U.S. Government as required by U.S. law.

Boycott requests are not always obvious. Be aware and watch for:

- Bid invitations that require us to provide information about our relationships with other countries
- Letters of credit or contracts that contain boycott terms or requests
- Meetings or discussions during which we are asked who we would or would not do business with

If you handle international business or cross-border activities, you are responsible for understanding and complying with our policies and applicable laws.

Contact the General Counsel immediately if you believe we have been asked to participate in or support an unsanctioned boycott or you have concerns about trade compliance.



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Properly Using and Protecting Company Information

Confidential Information and Company Assets

In the course of your relationship with A-dec, you may be exposed to confidential information which, if disclosed to others, could be detrimental to A-dec's interests. Company confidential information is an asset and we are all responsible for safeguarding confidential information and other Company assets from damage, theft, loss, or misuse. Company assets are intended to be used only for appropriate Company business purposes.

All A-dec employees are prohibited from revealing or disclosing any of A-dec's confidential information and this obligation continues even after your employment with A-dec ends. In addition, keep in mind that you may have confidentiality obligations to prior employers.

Confidential information generally includes all information about A-dec that is not publicly available or that is treated by A-dec as confidential. If you have questions about whether certain information is confidential, seek guidance from your supervisor/manager. Employees should also review our Information Systems Acceptable Use Policy and other applicable information security and technology policies.

For more information on confidentiality, review your confidentiality agreement, if applicable, the employee handbook and any relevant information technology or other policies for your location.

Protecting Employee, Business Partner and other Third-Party Information

We respect the privacy of our employees and safeguard sensitive personal information that the Company receives in the course of our work. Employees' personal information should only be used and shared for valid business purposes and employees with access to this type of information have an obligation to take appropriate safeguarding measures.

A-dec also strives to protect the confidential information of our business partners and other third parties.

Protecting personal information and the right to privacy has become a priority in many countries around the world and violations of applicable data protection laws expose the Company to significant monetary penalties. Our employees and business partners have obligations to protect confidential information, and in particular, personal information.

Consult with the Information Technology Department or the Legal Department for any questions about handling third party information.

If you become aware of the disclosure of confidential information, including personal information, report it using the resources identified in this Code.

Communications and Social Media

A-dec recognizes that social networking sites, blogs and other internet forums of various kinds are powerful tools for spreading messages, including positive messages about A-dec, its products and our brand. While social media creates new opportunities for communication and interaction, it also creates new responsibilities and risks for both you and A-dec.

When we use the term social media, we mean any digital technology or practice that enables people to use, create and share content, opinions and insights in conversations over the internet. This includes Facebook, Instagram, Twitter, WeChat, and LinkedIn, as well as other communication channels such as YouTube, blogs, wikis, and comments included on websites reviewing products and services.

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Employees must exercise good judgment in any communication, including social media communications, that may be associated with the Company, or which may impact relationships among employees and with our vendors, business partners and customers. Remember that we are a global organization and your communications may reach a diverse group of people. Always be respectful, honest and courteous. Never post or forward statements or materials that could be considered offensive, obscene, harassing, or threatening. Be thoughtful about what you post and share and remember your confidentiality obligations to both A-dec and our business partners. Be aware of privacy, trademark and copyright laws and do not post content without the consent of those owning or appearing in the media or providing appropriate credit. Any use of Company logos must be approved by A-dec.

The U.S. Federal Trade Commission considers the employer-employee relationship to be a material connection that must be disclosed when an employee is endorsing the employer's product or brand. If you endorse an A-dec product, on social media or otherwise, you should clearly and conspicuously disclose your connection with A-dec—for example, by including a statement that you are an A-dec employee verbally, or by using the hashtag: #employeeadvocate or #Adecdentalemployee.

Depending on the platform, there may be other ways to disclose your connection with A-dec. Please see the Communications and Social Media policy in the U.S. employee handbook or other employment policies for your location, for more information.

For more information, employees should refer to the employee handbook or other relevant policies for their location. This policy is not intended to restrict communications or actions protected or required by state, federal or other applicable law.



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We Engage Third Parties Who Share Our Values

It is important to A-dec that the third parties we do business with share our values and commitment to the principles in this Code and The A-dec Way. We are committed to doing the right thing and striving for excellence together. No third party is ever permitted to take any action on our behalf that A-dec is not permitted by applicable law or policy from taking ourselves, and we expect our business partners to report concerns of a violation of law or policy using the relevant resources identified in this Code.

Managing this Code

This Code was adopted on August 29, 2019 by A-dec, Inc.'s Board of Directors. Material amendments or changes to this Code may only be made by the Board of Directors. Administrative or non-substantive changes may be made by the General Counsel.

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