



STRAUMANN  
**CODE OF CONDUCT**



COMMITTED TO  
**SIMPLY DOING MORE**  
FOR DENTAL PROFESSIONALS

## PREFACE

As a global leader in implant dentistry and dental tissue regeneration, Straumann respects laws and regulations. Apart from these obligations, there are numerous voluntary codes and recommendations, which have been established by industry associations, the UN, OECD and other organizations.

This Code of Conduct („Code“) has been compiled with the intention of ensuring that we as a company and as individual employees conduct our business in a legal, ethical and responsible manner and with due respect to the environment.

True to Straumann’s guiding principle of „simply doing more“, this Code goes beyond the basic legal requirements and accommodates industry guidelines and other principles. As a company, we strongly believe that ethical behavior and good corporate citizenship are fundamental to our long-term sustainable development and are thus in the interest of all our stakeholders, especially our staff, shareholders, customers and the communities in which we operate. We further believe that ethical behaviour includes respect for human rights and our company is therefore committed to respecting human rights.

All our employees must therefore be familiar with this Code, conduct themselves in accordance with it and seek to avoid even the appearance of improper behavior. This means that throughout our company we must take personal responsibility and aspire to trust and respect in all our relationships.

With the introduction of this Code, Straumann has established procedures to facilitate the reporting of breaches and to protect individuals who report such matters. This initiative and the establishment of the Code have been approved by Straumann’s Board of Directors.



Gilbert Achermann  
President & CEO

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## **Guiding principles**

This Code is based on the principles of:

- ethical and legal business behavior;
- fair and respectful treatment of clients and commercial partners, society in general, the authorities, and the environment;
- fair and respectful treatment of all Straumann employees, and
- commitment to Straumann, its reputation and corporate goals

## **A code for all employees**

As a Straumann employee (“Employee” or “you”) you must follow this Code. You are expected to familiarize yourself with it and to make sure you are familiar with other Internal Regulations, including Straumann policies, standard operating procedures and directives (“Internal Regulations”). You must also be familiar with the laws that apply to your own field of responsibility and those of people under your supervision. If there is any conflict between national, state or local laws or regulations and this Code, you must comply with the applicable law or regulations.

If you are uncertain about applicable laws or Internal Regulations or if you have any questions in this respect, please speak to your superior or contact Straumann’s General Counsel.

## **Code as a compliance framework**

This Code provides a framework for compliance with the law and ethical behaviour. It complements other Internal Regulations - such as those specified in the HR-handbook, on Straumann’s computer-based platforms or in hard copy. Internal Regulations may vary from country to country and may be amended from time to time to reflect local business practices. Internal Regulations continue to be part of Straumann’s global legal compliance efforts and may address additional compliance issues or specific details of principles in this Code. Notwithstanding, this Code takes precedent over Internal Regulations and is the basis for their interpretation and application.

## **Common sense**

You may from time to time encounter situations that appear to be unethical, suspicious or improper, even though they do not contravene this Code, Internal Regulations, or the law. In such circumstances, you should use common sense and sound judgment to resolve or address the situation. Employees should make ethical decisions according to the ethical business practices outlined in this Code.

## **Ethical business practices**

Fair and honest business practices are critical to Straumann's success. Straumann prohibits unethical or illegal business practices. Employees must deal fairly and honestly with Straumann's business partners, customers, and competitors. You should not take unfair advantage of anyone through manipulation, bribery, concealment, abuse of privileged, confidential, or trade secret information, misrepresentation of material facts, or any unfair dealing practice.

Straumann has country-specific policies and procedures that govern the interaction of employees with customers and clients, including individuals, companies, organizations, or anyone else who uses, orders, purchases, or recommends the purchase of Straumann products and services. You are expected to fully understand and adhere to those policies and procedures.

## **Fair competition**

Antitrust laws are designed to ensure free and open competition. In this respect, employees are prohibited from collaborating with competitors or from taking any action that could have an improper anti-competitive effect, including the following:

- a. entering agreements, understandings or alliances that limit or are intended to limit competition;
- b. entering into illegal tying or bundling agreements or using artificial pricing schemes to stifle competition.

To avoid even the appearance of an antitrust violation, you should never become involved in discussions with competitors about pricing, the terms and conditions under which products are sold, or other competitively-sensitive information.

## **Regulatory and marketing practices**

Straumann products are regulated by governmental agencies, ministries of health, and other regulatory bodies/authorities around the world. Regulatory requirements also affect the way in which Straumann is able to market its products. Every employee is responsible for complying with such product and marketing regulations and requirements.

Straumann's advertising and marketing practices should be designed to convey honest, substantiated information about our products. Straumann prohibits marketing or sales practices that are illicit or dishonest.

## **Conflict of interest**

You have a duty to take business decisions that are in Straumann's best interests. You are responsible for avoiding any situation that might lead to a conflict of interest or give the appearance of such a conflict. Conflicts of interest arise in many ways, for example:

- when an Employee's private interests interfere or appear to interfere in any way with the interests of Straumann;
- when Employees are guided or influenced by gain or benefits for themselves, their family members, or their close personal acquaintances;
- when an Employee has a significant financial interest in a business that does or seeks business with Straumann or is a competitor of Straumann; or
- when extraordinary benefits, such as material gifts, donations, hospitality or vacations are accepted from any person or business organization that does or seeks business with Straumann or is a competitor of Straumann.

This Code does not prohibit the acceptance of an occasional gift of small or insignificant value, provided that the acceptance of the gift does not create a conflict of interest. However, the acceptance of gifts of small value shall be reported on the gift acceptance form on Straumann's compliance database. Under no circumstances should you accept any payment of money.

## **Equal opportunity and harassment**

Straumann is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination (such as gender or religious discrimination) or harassment (such as sexual harassment).

## **Confidentiality, intellectual property, and insider trading**

The protection of Straumann's property and confidential information is critical to the company's success. Confidential information includes all non-public information about Straumann and may pertain to intellectual property such as patents, trademarks, designs, copyrights, and know-how. Confidential information also includes trade secrets, such as business and marketing plans, engineering and manufacturing ideas, databases, records, salary and personnel information, unpublished financial data, internal reports etc.

You must safeguard all confidential information. Straumann prohibits the disclosure of confidential information to unauthorized persons (including not only unauthorized external parties but also Straumann employees who are not specifically authorized to know such information).

Unauthorized use or distribution of confidential information may harm Straumann's position in the market or constitute a breach of other agreements. Premature communication of confidential know-how, ideas, and inventions to third parties may destroy or foreclose the legal protection of Straumann's intellectual property.

The use of confidential information for personal (financial) benefit and the supply of confidential information to others who might use it for financial benefit or make an investment decision is not only strictly prohibited by this Code but may also be a criminal offence.

## **Proprietary information**

Employees must be informed about the competitive environment and seek information with respect to the company's competitors and markets. However, you must never use illegal or dishonest means to acquire confidential proprietary information from or about any person, company, or Straumann competitor. Employees should reject confidential proprietary information offered or owned by third parties.

## **Records**

Straumann requires honest and accurate recording and reporting of information in order to make responsible business decisions. You must ensure that all records within your responsibility are accurate and do not include any false or misleading information.

Employees must create business documents and records that are professional, business-like, and consistent with this Code and other Internal Regulations. You should not use inappropriate language, exaggerations, derogatory comments about colleagues, business partners, competitors, customers, especially in printed or electronic documents (such as e-mails), and in speech that is public or which may be recorded. You must be aware that even internal and confidential documents (especially e-mails) are sometimes made public through litigation or otherwise. You are therefore expected to use good judgment and to follow acceptable business practices when preparing such documents and materials.

## **Environment, health and safety (EHS)**

Straumann is committed to protecting the health and safety of its Employees and the environment. All Employees are expected to obey all laws and Internal Regulations designed to protect health and to ensure a safe working place.

In addition to the facility management, the quality management functions and the Environment, Health and Safety officer, the management in general shall encourage Employees to consider environmental protection, safety and health as an integral part of their everyday responsibilities.

## **Government or regulatory investigations**

If you receive any inquiry from a government investigator, you must immediately notify your superior and the General Counsel so that appropriate arrangements can be made to comply fully with the legal obligations.

During any government investigation, you should not destroy or alter any Straumann documents, lie, or make deliberately misleading statements.

### **Communication guidelines**

Straumann has designated specialists to ensure professional and comprehensive assistance with external enquiries and to coordinate written and oral communication to external audiences. It is, therefore, important that all such information must be processed according to Straumann's publication guidelines. This also applies to communications posted on the internet. If you are in doubt with whom you should consult regarding the publication of information, please contact the Head of Corporate Communications or the General Counsel.

### **Reporting violations**

If you become aware of any activity that may be inconsistent with any provision of this Code, Internal Regulations or any law or regulation, you must inform your superior and/or Straumann's Chief Compliance Officer. Investigations will be held according to internal procedures corresponding with the applicable national laws and regulations. Straumann will not retaliate against any Employee for making a good faith report or for participating in the investigation of a good faith complaint regarding a violation of this Code.

### **Disciplinary measures**

Employees who violate the standards in this Code or other Internal Regulations will be subject to appropriate disciplinary action, which may include termination of employment or service. It is Straumann's policy to investigate thoroughly any good faith reports pertaining to violations of this Code.

### **Execution and Requests**

Straumann's Chief Compliance Officer is responsible for overseeing compliance with this Code.

Supervisors and managers must ensure that Employees under their supervision understand and comply with this Code and Internal Regulations. Straumann's agents and representatives, including consultants, should also adhere to this Code.

If you have any questions regarding this Code, or doubts as to whether your actions are consistent with this Code, Internal Regulations or the law, please consult Straumann's General Counsel.

[www.straumann.com](http://www.straumann.com)

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**International Headquarters**

Institut Straumann AG  
Peter Merian-Weg 12  
CH-4002 Basel, Switzerland  
Phone +41 (0)61 965 11 11  
Fax +41 (0)61 965 11 01

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