

## **UK Modern Slavery Act Report**

Dentsply Sirona is firmly committed to supporting global efforts to combat modern slavery, human trafficking, and all forms of human rights abuse.

This statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and constitutes Dentsply Sirona's modern slavery and human trafficking attestation for the 2024 UK financial year. While not all subsidiaries are subject to these Acts, this joint statement outlines the steps Dentsply Sirona has taken to prevent modern slavery and human trafficking within its operations and supply chains globally.

For the purposes of this statement, Dentsply Sirona and its subsidiaries are collectively referred to as "Dentsply Sirona." The reporting entities covered by this joint statement include:

Dentsply IH Limited

Dentsply Russia Limited

Dentsply Sirona Repair Centre (UK) Limited

Wellspect Limited

### **Dentsply Sirona's Organization Structure and Supply Chain Overview**

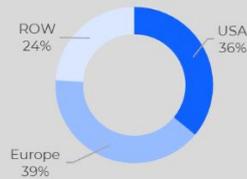
Headquartered in the United States of America, Dentsply Sirona holds a prominent global position in the manufacturing and supply of dental equipment and consumables. Dentsply Sirona also manufactures and supplies a comprehensive array of medical devices that help people across the globe with continence care through a wide range of products and services. Our purpose is to empower millions of customers by proudly creating innovative solutions for healthy smiles. Our vision is to transform dentistry to improve oral health standards globally. To realize this vision, we employ the principles of innovation, resilience, and exceptional service delivery all while maintaining the highest ethical standards.

Our global supply chain includes manufacturers of raw materials and components which are used in the production of Dentsply Sirona products sold through distributors and directly via Dentsply Sirona sales staff and our website to medical professionals and institutions around the world. Our product supply chains are extensive and global, with suppliers in more than 100 countries. The majority of our suppliers are long-term relationships and are based in Germany, Italy and the United States of America. The main types of raw materials and components that are used in the production of our products are plastic parts, metal parts and electronics. We source from 2,748 direct suppliers globally, with 81% of spending focused on the top 250 direct suppliers (57% of spending belongs to the top 250 overall suppliers). Our top 250 direct suppliers are primarily based in Germany, Italy, Sweden, and the United States of America.

In our pursuit of maintaining the highest ethical standards, Dentsply Sirona has established a cross-functional Ethics and Compliance Committee. The Ethics and Compliance Committee consists of members of our executive leadership team and other functional leaders. The committee works with our Chief Compliance Officer in support of the Compliance program to ensure that issues are identified and addressed using a risk-based approach. Under this committee's charter, our Ethics and Compliance initiatives demonstrate Dentsply Sirona's unwavering commitment to our core values which set behavioural expectations for employees, business partners and industry consultants. Ultimately, this proactive approach to managing the Company's ethics and compliance program helps ensure a sustainable future for our Company.

## Revenue

~\$3.79bn



## Market Cap

~\$3.8bn

Nasdaq: XRAY



## Geographic Reach

40+

Locations in more than 40 countries  
Sales in more than 150 countries

Map indicates Dentsply Sirona countries, not exact locations.



## Employees

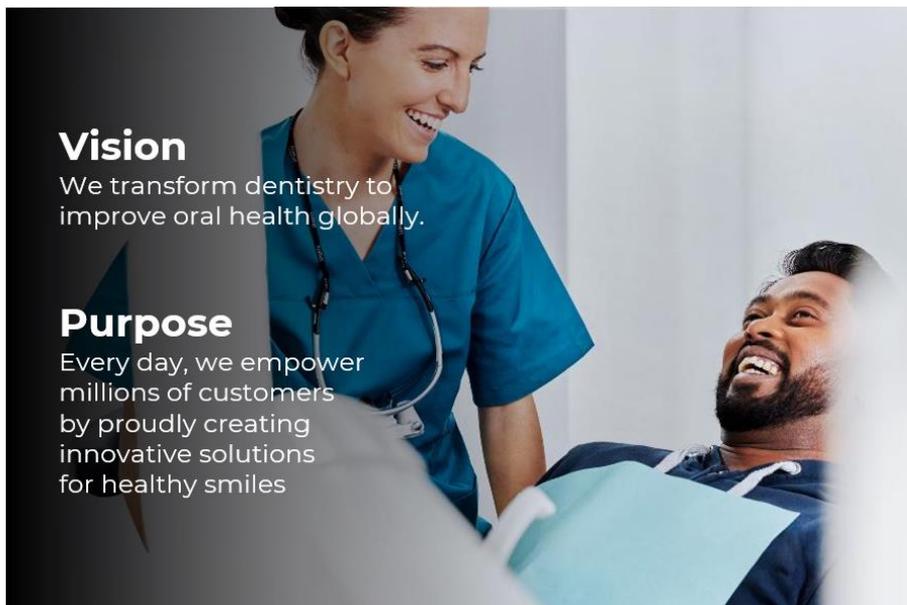
15,000

Largest sales & customer service infrastructure in dental with approximately 14,000 employees

## Dentsply Sirona's Values and Operating Principles

At Dentsply Sirona, we have a core set of Values and Operating Principles which guide our employees globally to reach our goals using the highest ethical standards. Our Values and Operating Principles are the foundations of how we operate, and employees are trained on this at onboarding and throughout their careers at Dentsply Sirona. The culture of our organisation forms the foundation of our Company. Our culture describes who we are, what we stand for, and why we do what we do every day.

Dentsply Sirona operates in line with the UN International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We support freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment.



### Values

- **Agile:** We innovate. We challenge ourselves constantly. We act quickly.
- **Accountable:** We hold ourselves and each other accountable.
- **Respectful:** We listen. We foster diversity and inclusion. We respect the communities in which we live and work.
- **Collaborative:** We are good partners. We learn from each other. We are one team. We have fun.
- **Trustworthy:** Our customers can rely on us. We can rely on each other. We empower our people.

### Operating Principles

- We approach customers as **ONE** Company, and they are core to everything we do.
- We create **innovative** solutions that customers love to use.
- We think and act with **positive** intent and the highest integrity.
- We operate **sustainably** in everything we do.
- We use our size and global breadth to our **advantage**.

As of 31/12/2024, Dentsply Sirona has a global workforce of approximately 14,298 employees across 49 locations worldwide, including 203 employees based in the United Kingdom.

Dentsply Sirona provides comprehensive end-to-end solutions to dental professionals and is the world's largest manufacturer of professional dental products and technologies. Together with our partners, we empower dental professionals all over the world to provide millions of patients<sup>1</sup> with best-in-class dental care and deliver healthy smiles. We are on a journey to transform dentistry to improve oral health globally and are proud to be a preferred partner for dental practices, clinics, dental laboratories and authorised distributors worldwide.

<sup>1</sup> For our Byte division, patients are also defined as customers  
9083-CCD100 [1]

	ESSENTIAL DENTAL SOLUTIONS				CONNECTED TECHNOLOGY SOLUTIONS		ORTHODONTICS & ALIGNER SOLUTIONS	IMPLANT & PROSTHETIC SOLUTIONS	WELLSPECT HEALTHCARE			
WELL-ESTABLISHED BRANDS	AH Plus®	Aquasil Ultra+ Smart Wetting Impression Material	Calibra Cements	Cavitron®	Axano®	Axeos®	SureSmile® Aligners	Astra Tech Implant EV	Atlantis®	<b>LoFric</b>  <b>Navina</b>		
	CEREC Tessera	CEREC MTL Zirconia	Nupro®	<b>MALLEFER</b>	CEREC Primemill®	DAC		PrimeTaper EV OmniTaper EV	Cercon ht ML		Cercon xt ML	
	Palodent V3 Sectional Matrix System	Prime&Bond®	ProTaper Ultimate	SmartLite Pro	Orthophos®	Primescan®		Lucitone Digital Print Denture System	<b>MIS</b>		<b>OSSIX</b> ®	Simplant®
	Spectra ST Universal Composite Restorative	<b>SDR® flow+</b>	WaveOne® Gold	<b>VDW</b>	Primeprint®	Schick						
				Sidexis® 4	Sinius®							
				SiroLaser	TI-T4 instrument series							

The table above shows the various product-lines Dentsply Sirona manufactures globally

## Our policies on slavery and human trafficking

Dentsply Sirona is fully committed to supporting global efforts to address the issues of modern slavery and human trafficking. We actively pursue this commitment through our internal policies as well as through direct actions with our business partners throughout our supply chain. We stringently expect all our employees and business partners to fully comply with the California Transparency in Supply Chain Act of 2010, the UK Modern Slavery Act of 2015 and Australian Modern Slavery requirements including the New South Wales Modern Slavery Act of 2018. To this end, we have included human rights issues such as human trafficking in our major global policies which all staff are trained on a two-year cycle. Furthermore, we are in the advanced stages of crafting distinct policies addressing human rights issues. Upon completion, these policies will be disseminated to our staff through our online learning management system, further reinforced by on-site training conducted by skilled compliance professionals.

[Dentsply Sirona's Code of Ethics and Business Conduct](#) (the Code), encapsulates our identity, values, and the critical role we each play in ensuring compliance with all pertinent laws. It underscores our unwavering commitment to performance with integrity in all our interactions with customers, healthcare professionals, distributors, suppliers, consultants, and government officials and agencies.

The Code sets out guiding principles for conducting business that must be followed by everyone who does business for the benefit of or on behalf of Dentsply Sirona and establishes the expectations for how we operate globally. It outlines expectations for uncompromising integrity and compliance with all laws and regulations when it comes to customer, supplier, distributor, key opinion leader and government official interactions. It also provides guidance on identifying, mitigating, and managing a wide range of risks, and underscores our commitment to our employees and communities around the world. Supervisors and managers are responsible for ensuring their teams comply with the Code, and all employees are responsible for ensuring they can recognize potential compliance issues and to seek the appropriate advice from subject matter experts regarding any issues. The Code is reviewed annually by the Ethics and Compliance Committee as well as the Board of Directors.

The Code outlines the expectation that all our employees work and act to the highest ethical standards. Training on the Code is compulsory for all new employees at onboarding, as well as annually for all existing employees, reiterating the expectation for all our staff to adhere to the highest ethical standards.

[Dentsply Sirona's Business Partner Code of Conduct](#) articulates our core values and the expectations we have for our third-party business partners in every business relationship we engage in worldwide. The Business Partner Code of Conduct is available in 21 languages and is promoted through business meetings as well as being available on our websites globally.

We require business partners in our supply chain to acknowledge and comply with our Business Partner Code of Conduct. We look at compliance with all applicable laws globally as just a starting point for ethical business behaviour and hold ourselves and our business partners to the highest standards in terms of promoting basic human rights and dignity and to be good corporate citizens and good neighbours in the communities in which we work and live. Each business relationship is governed by a written agreement, 9083-CCD100 [1]



purchase order, or set of Terms & Conditions, all of which incorporate provisions prohibiting corruption, bribery, and human rights abuses. These documents also require compliance with all applicable trade sanctions—including those of the United States—and with laws and regulations addressing anti-human trafficking and modern slavery.

In addition, our Human Rights Policy Statement sets out our human rights and environmental expectations for our employees and suppliers in the supply chain. The policy statement is made available through various internal and external communication channels.

Dentsply Sirona's Human Resources department conducts a risk assessment that covers potential operational risks, specifically including those resulting from non-compliance or unethical behaviour. Human Resources is tasked with analysing risks related to child labour, slavery and forced labour, freedom of association, prohibition of discrimination (including wage discrimination), and ensuring the guarantee of minimum wage.

Compliance with relevant local, national, and international legislation is also assessed and regularly audited by local authorities.

These assessments are complemented by recurring internal audits to ensure compliance with both internal and external regulatory frameworks.

## **Whistleblower Hotline System**

At Dentsply Sirona we emphasize that all staff should feel confident enough to speak up should they witness possible breaches of our company policies, including our Code of Ethics and Business Conduct, or potential violations of laws or regulations governing our business anywhere in the world. Management is encouraged to engage with employees on this issue and are asked to regularly remind staff that 'if you see something, say something'.

We have established a whistleblower hotline system administered by a third-party service provider which enables our employees, business partners and external parties to report any perceived unethical behaviour or wrongdoing anonymously (where permitted by law) or by leaving contact details. The hotline system is accessible online or by phone. We have a separate toll-free hotline number for each of the locations in which we have a physical presence and is available in local language. All reports made via the website or hotline numbers are sent to our Chief Compliance Officer, General Counsel and the head of the Audit and Finance Committee on the Board of Directors. Each report is then evaluated by the Ethics & Compliance team's Global Investigations team. If it is determined that an investigation is required, resources will be allocated as necessary to manage and execute.

All Dentsply Sirona staff are encouraged to use the whistleblower hotline and are reminded through annual online and on-site training as well as each of our office locations having whistleblower hotline posters displayed in positions with the highest footfall. Our Whistleblower Hotline System Policy is also freely available and accessible to all staff on the Dentsply Sirona SharePoint Intranet.

At Dentsply Sirona we are steadfast in our aim of creating a safe and supportive environment for our employees to report issues without apprehension. In support of this, we have implemented a 'No Retaliation Policy.' This policy prevents any form of disciplinary action against individuals named or involved in a potential report until the conclusion of a thorough investigation. This approach is designed to mitigate concerns employees might have about reporting issues, specifically fears of potential disciplinary actions from superiors upon learning that an investigation is underway.

## **Third-Party Supplier Conduct Agreement**

Dentsply Sirona communicates our human rights expectations to our suppliers using contractual provisions. All suppliers are required to comply with our Third-Party Supplier Conduct Agreement provisions. These provisions define our expectations for each supplier we work with globally and covers a wide range of subjects such as audit rights, compliance with applicable local and international laws, anti-bribery, anti-corruption, sub-contractors and

fighting various human rights issues such as human trafficking, modern slavery and conflict minerals.

Suppliers are required to acknowledge and agree to comply with Dentsply Sirona's Code of Ethics and Business Conduct, as well as our Business Partner Code of Conduct. This acknowledgement may be formalised through various contractual formats—including, but not limited to, Third-Party Supplier Conduct Agreements, purchase order terms and conditions, or master service agreements—depending on the nature of the engagement.

By attesting to this compliance commitment, suppliers self-certify that they will adhere to all applicable local and international laws, including those addressing human trafficking and modern slavery. They also confirm their acceptance of the standards outlined in Dentsply Sirona's Code of Ethics and Business Conduct and Business Partner Code of Conduct, and agree to cooperate with any compliance-related requests, which may include on-site audits if deemed necessary.

## Training

As part of our commitment to upholding the highest standards of integrity and ethics in our operations, Dentsply Sirona takes responsibility for the conduct of all employees, recognizing that each individual represents our company's values. To support this, all employees globally are required to complete training on our Code of Ethics and Business Conduct during onboarding, with annual refresher training thereafter. This foundational training reinforces our ethical expectations and helps embed a culture of compliance from the outset.

Training is delivered through a blend of methods—including global communications, interactive digital learning modules, and on-site sessions—ensuring accessibility and consistency across our regions. All training is managed by our Ethics and Compliance Department to maintain high standards and relevance to our business and regulatory landscape.

Furthermore, we extend this commitment to high ethical standards to our procurement process, diligently training appropriate staff involved in procurement as well as our finance teams and business leaders in our onboarding and due diligence procedures.

Through this structured and role-appropriate training approach, we aim to equip our employees with the knowledge and confidence to uphold human rights, recognize red flags, and respond effectively to potential risks of modern slavery in our business and global supply chains.

## Assessing Modern Slavery Risk

In line with our obligations under the UK Modern Slavery Act 2015, Dentsply Sirona undertakes a structured and collaborative approach to assessing modern slavery risks across our global operations and supply chains. We work with external experts and legal counsel to enhance our risk evaluations, and actively engage with industry peers to share insights and strengthen practices.

Our assessments are informed by credible sources including Alliance 8.7, the UK Government's Annual Modern Slavery Report, and the U.S. Department of Labor's List of Goods Produced by Forced or Child Labor. This enables us to maintain a comprehensive view of global labour risks.

Our highest exposure to modern slavery risk lies in our use of third-party service providers—particularly in cleaning, catering, and transportation—operating in high-risk geographies. We prioritise working with providers that have no known adverse human rights records, using a structured due diligence process to screen new and existing partners.

Based on insights from our ongoing risk assessments, we actively seek to limit supply chain activity in countries identified by credible sources as high-risk for modern slavery or forced labour. These efforts support our broader objective of promoting ethical sourcing and safeguarding human rights across our global operations.

We have taken steps to eliminate engagements with suppliers based in countries identified by international organisations as high-risk. Dentsply Sirona does not source from North Korea, Eritrea, Libya, Iran, Equatorial Guinea, Burundi, Democratic Republic of the Congo, Republic of the Congo, Somalia, Central African Republic, Afghanistan, or South Sudan.



In light of the heightened risk of encountering modern slavery in the supply chain when associating with suppliers from countries where it is a known issue, Dentsply Sirona predominantly sources its materials from nations renowned for their stringent measures to combat modern slavery. These countries include Germany, Italy, Switzerland and the US. Demonstrating our proactive stance, over 62% of our direct suppliers are based in these four countries alone, which further underscores our commitment to ethical sourcing and the global fight against modern slavery.

Dentsply Sirona has not identified any instances of modern slavery in its activities or supply chains for the 2024 reporting year.

Dentsply Sirona has identified that some materials required to produce certain Dentsply Sirona products are considered higher risk for modern slavery such as rubber and cobalt. For these two materials we exclusively use suppliers based in countries with a strong history of combating modern slavery such as Denmark, Germany, Switzerland, the US, and the UK. Electronics is another category of component considered high-risk which we use in our equipment, therefore we have structured our supply chain in such a way to ensure that the vast majority of our electronics suppliers are based in Germany.

Further risk focus areas include freight, raw materials, IT, and telecommunications:

- 80% of our freight spending is directed towards suppliers based in Australia, Germany, the UK, and the US.
- 68% of our IT and telecommunications spending is allocated to suppliers located in Germany, Sweden, Switzerland, and the US.
- 94% of our raw materials spending goes to suppliers based in Belgium, Germany, Sweden, Switzerland, and the US.

This deliberate sourcing strategy reinforces our ethical commitments and supports our global human rights agenda.

## **Due Diligence Processes**

Our initiatives to mitigate the risk of human rights abuses within our supply chain are part of Dentsply Sirona's global commitment to engage exclusively with third parties that uphold high ethical standards. These efforts are consistent across all jurisdictions in which we operate, including the United Kingdom. Our due diligence process is centrally managed by global Ethics & Compliance and Procurement teams to ensure consistency, effectiveness, and accountability.

## **Third Party Risk Assessments**

To ensure the objectivity, accuracy, and robustness of our due diligence processes, an independent third party was contracted to perform both abstract and in-depth risk assessments of selected suppliers globally, including those supporting our UK operations. For the abstract risk assessment, the third-party service provider utilised a country and industry risk prioritisation tool that aggregates data from various sources on global human rights and environmental risks.

Suppliers selected for an in-depth review were determined based on the degree of influence with the supplier, length of the relationship, geographic location, and the criticality of the supplier. Additionally, suppliers who fell into the high or medium-risk categories based on this assessment were screened for negative media mentions related to human rights and environmental violations through an enhanced screening tool that leverages data from over 2 million sources in 18 languages across approximately 180 countries.

All medium and high-risk suppliers identified in the abstract risk assessment were advanced to the specific risk assessment stage, where they were required to complete a risk assessment questionnaire. This questionnaire collected information on suppliers' risk management systems and control mechanisms for identifying and preventing human rights and environmental violations. The responses were evaluated alongside supporting evidence. Based on these responses and related assessments, the service provider determined whether further investigation was required, and any identified gaps were addressed with corrective actions to remediate issues.



These risk assessments are conducted in accordance with our obligations under the UK Modern Slavery Act 2015, and help ensure that forced labour and child labour are not present in our supply chains.

## Supplier Onboarding Workflows

### Workflow A

All suppliers, including those supporting our UK operations, are subject to Dentsply Sirona's globally-managed onboarding process. As part of this process, the onboarding team member completes a questionnaire capturing key supplier details, including (but not limited to) name, country, industry, and anticipated purchase volume. A risk flagging system is then used to classify each potential supplier as low, medium, or high risk.

Suppliers deemed medium-high risk then go through our online due diligence portal to confirm their credibility and ethical standing. Our due diligence and onboarding process utilizes a risk-based approach to identify areas in our supply chain with the highest risk of human rights violations and which require greater focus to mitigate the risk that human rights violations such as human trafficking and use of conflict minerals are occurring. The process was created with help from an external service provider which specializes in third-party risk and due diligence solutions.

Once a supplier has been added to our due diligence portal, a copy of our business partner code of conduct, a due diligence questionnaire and a training deck are automatically sent to their contact email address. The questionnaire requires the potential supplier to answer questions on topics ranging from company structure and industry, if they source any materials from known human rights hotspots and sustainable procurement, to their commitments and actions fighting human rights abuses. The answers given to this questionnaire are considered when the Ethics and Compliance department makes the decision to approve or reject the business engagement.

The training deck which is sent out to all potential suppliers covers a range of topics including human rights and modern slavery, anti-bribery and anti-corruption, trade sanctions, conflicts of interest and it also covers use of our whistleblower hotline system. Potential suppliers are required to read the training and certify that they have understood the contents. This is also checked prior to approval or rejection by the Ethics and Compliance department.

Potential suppliers are then screened against a wide selection of sanctions lists and watch lists, those which are deemed to be higher risk – based on industry or location – are also subject to adverse media searches in English and the language local to the supplier. All due diligence checks are conducted by our independent due diligence provider. This due diligence process enables Dentsply Sirona to identify any human rights risks or issues prior to engagement.

Once the due diligence report, the supplier questionnaire and training deck have been completed and a copy of the signed Third-Party Supplier Conduct Agreement has been uploaded to the online portal, the Ethics and Compliance department will review and decide to approve or reject.

Once approved, all third-parties are screened daily against the same level of due diligence that they were screened against at the onboarding stage and if an alert were to subsequently be found after on-boarding, it will be assessed and dealt with by the Ethics and Compliance team.

If there are any issues found during the initial due diligence reporting phase, the alert will go through remediation by our due diligence provider to ensure that the alert is confirmed to be related to the potential third-party partner which we are screening. If the alerts remain then they are assessed on a case-by-case basis by the Ethics and Compliance team and the engaging Dentsply Sirona business.

Suppliers will certify in our Third-Party Supplier Conduct Agreement that they understand and will comply with Dentsply Sirona's Code of Ethics and Business Conduct as well as the Business Partner Code of Conduct.

### Workflow B

Potential suppliers that are deemed 'Exceptions Suppliers' go through a modified process. 'Exceptions Suppliers' include (but are not limited to) travel expenses, intercompany business, Human Resource services, customer rebates and refunds, speakers and healthcare professionals and utilities. These suppliers go through a more

streamlined process due to the nature of their business. Generally, for 'Exceptions Suppliers' we have preferred vendors which have been vetted and helps to alleviate potential risks associated with lower spend categories.

## Effectiveness of Due Diligence Measures

To date our risk mitigation efforts have proven successful as we have had no instances of slavery, child labour or human trafficking noted in any Dentsply Sirona business.

## Measuring Effectiveness

All due diligence reports and third-party onboarding information are created and maintained within our centralised system, which is monitored daily against a comprehensive range of sanctions and restrictions lists. We receive automated alerts if potential concerns arise regarding any of our existing or potential third-party partners. These alerts are promptly reviewed and addressed by our Ethics and Compliance team. In addition, we receive regular monthly reports from our external due diligence provider to ensure all alerts are captured and responded to in a timely and effective manner.

At Dentsply Sirona, we are committed to being a global leader in Ethics and Compliance in the dental and medical device industry. In 2024, we undertook a comprehensive update of our due diligence and procurement onboarding procedures, which were finalised and began implementation globally in 2025. These enhancements are designed to further strengthen our approach to identifying and mitigating the risks of forced labour and child labour in our supply chains.

While these new procedures reflect our evolving and proactive approach, they were implemented after the 2024 financial year and are therefore not fully reflected in the activities described in this report. They will be included in our future disclosures.

In 2024, we also updated our whistleblower hotline system and supporting policies to enhance accessibility, transparency, and employee confidence in the reporting process. This update is part of our broader commitment to strengthening our Ethics & Compliance infrastructure and is reflected in this report.

In 2025, we are increasing employee and third-party awareness across the business regarding our efforts to prevent the use of forced labour and child labour in our operations and supply chains. This includes enhanced communications on Ethics & Compliance topics and continued rollout of the updated onboarding and due diligence procedures.

In support of continuous improvement, Dentsply Sirona's Ethics and Compliance team, in consultation with external legal counsel, has conducted a risk-based review of our program to ensure a targeted focus on the most significant areas of exposure. We are also strengthening supplier contracts and self-certification measures and building upon our existing compliance policies and control processes.

Accountability for enforcing and maintaining our human rights due diligence framework resides with Dentsply Sirona's Ethics & Compliance team, in coordination with global procurement and regional management. This governance structure ensures effective oversight and responsiveness across our international supply chains.

This statement has been approved by the Dentsply Sirona Board of Directors on 30/05/2025.

Signed: *Francois Loiseau*

Name: Francois Loiseau

Position: Vice President and General Manager – Western Europe

This joint statement is made on behalf of the following UK-based reporting entities under section 54(1) of the Modern Slavery Act 2015:

- Dentsply IH Limited
- Dentsply Russia Limited
- Dentsply Sirona Repair Centre (UK) Limited
- Wellspect Limited