



Code of Ethics & Business Conduct

February 2026



Welcome to Our Code

At Dentsply Sirona, integrity is not just an expectation, it's a commitment we make to one another, our customers, business partners, stockholders, and the communities we serve.

Every decision we make reflects who we are and how we lead in transforming dentistry and continence care globally. The purpose of our Code of Ethics and Business Conduct is to guide, inspire, and empower each of us to uphold the highest ethical and professional standards, wherever we work in the world.

Through this Code, we honor our purpose and values and help ensure that our decisions reflect the trust our customers and communities place in us.

A message from our CEO

At Dentsply Sirona, how we achieve results matters just as much as the results themselves. Integrity is the foundation of everything we do. It's what earns us the trust of consumers, dental professionals, business partners, stockholders, and one another, and it's what enables us to fulfill our purpose of transforming dentistry and improving oral health worldwide.

Upholding that trust requires more than following rules; it takes courage, accountability, and a personal commitment to doing what's right. Our customer centric culture strengthens that commitment. By placing our customers at the heart of our decisions, working together as one team with one unified focus, and driving innovation that anticipates their needs, we create an environment where people can thrive, collaborate openly, and feel proud of the work we deliver.

Every decision and every action we make reflects on all of us. Together, we have built a strong reputation as a trusted leader in oral health and continence care, and each of us plays a vital role in protecting and elevating that reputation through ethical choices and actions, and a shared dedication to those we serve.

*Advancing with **INTEGRITY*** means using this Code as a guide — every day, in every role, and in every location. I encourage you to read it carefully, refer to it often, and rely on it as you navigate challenges with clarity and confidence. Thank you for your continued commitment to our values, to each other, and to the customers who depend on us.

Dan Scavilla
President & Chief Executive Officer




Dan Scavilla, President & Chief Executive Officer.

Our Purpose & Values

Everything we do starts with one mindset: Putting the customer at the center.

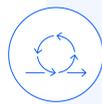
By transforming the customer experience and strengthening execution and speed, we build the foundations for sustainable growth and lasting success for Dentsply Sirona.

Values in action



Accountable

- Takes ownership of decisions, actions, and results
- Identifies and resolves issues at the root
- Delivers results with speed and excellence



Agile

- Recovers from difficulties and adapts to change
- Maintains a hopeful and constructive perspective
- Quickly adjusts in the best interest of our customers



Collaborative

- Functions as one team, one focus
- Knows when and how to seek help
- Works cross-functionally to serve our customers



Respectful

- Builds relationships and is easy to work with
- Encourages open dialogue and listens actively
- Represents own goals while supporting others



Trustworthy

- Always acts with integrity
- Consistently follows through on commitments
- Delivers the best outcomes for our customers





Integrity in Action boxes highlight practical examples and reminders to help you recognize common ethical risks and apply our Code in everyday situations.



Why the Code?

Our Code is a practical tool that helps each of us make choices that reflect our values and protect the company.

It applies to everyone at Dentsply Sirona - regardless of role, title, or location - as well as to contractors, consultants, and other third parties acting on our behalf. We expect our business partners to share and uphold our values.

Use the Code whenever you're faced with a difficult decision, if you are unsure about the right course of action, or if you need clarity on our expectations. While it may not have every answer, it will point you in the right direction and connect you to the resources that can help.

By using the Code and speaking up when something doesn't feel right, we protect one another and help ensure we're always *Advancing* with **INTEGRITY**.

Integrity In Action

When should I use the Code?

- When you're unsure if a decision aligns with our values.
- When you are unsure of a company policy or guideline.
- When you face a situation that feels uncomfortable, unethical, or unclear.
- When you need help understanding your responsibilities.

Remember:

- The Code applies to all of us, no matter your job title or location.
- It's okay not to have all the answers. Asking questions is part of doing the right thing.
- Speaking up helps protect our people, our reputation, and our ability to keep *Advancing* with **INTEGRITY**.



Living our Values

Our Commitment to Our People

Our people are our greatest asset. We are committed to creating a workplace where every employee feels valued, respected, and supported regardless of role, location, or background. We believe that a culture rooted in trust, inclusion, and mutual respect empowers individuals to grow, contribute, and thrive.

Our global team is united not only by our business goals, but by a shared purpose and a common set of values. As we innovate and grow, we are guided by our customer centric culture; acting as one team with a shared

focus, accelerating innovation, and holding ourselves accountable to one another. These principles guide how we serve customers and partners, and how we support and collaborate every day.

We expect every employee to foster an environment where people feel safe to speak up, contribute ideas, and be themselves. We do this by treating others with fairness and professionalism, raising concerns early, and taking responsibility for the way our actions affect those around us.

This section outlines how we bring our values to life in the workplace. It describes the key principles and expectations that support a respectful, inclusive, and safe environment for all. These commitments are not just policies; they are part of who we are and how we strive to keep *Advancing* with **INTEGRITY**.

Anti-Harassment and Anti-Discrimination

At Dentsply Sirona, everyone has the right to work in an environment that is respectful, professional, and free from harassment and discrimination. Harassment and discrimination go against our values and have no place in our company.

Harassment includes any unwanted conduct that creates a hostile, intimidating, or offensive environment. It can be physical, verbal, written, or even non-verbal, such as gestures or images. Discrimination is when someone is treated unfairly or unequally because of their race, color, nationality, sex, gender identity, sexual orientation, religion, age, disability, or any other characteristic protected by law.

We all have a duty to speak and act respectfully. This means we must avoid jokes, comments, or actions that could make others feel uncomfortable or unwelcome.

Remember: sometimes even unintentional behavior can be harmful. If someone tells you something you did or said bothers them, take it seriously and stop the behavior.

All Dentsply Sirona, managers and team leaders must act if they see or learn about inappropriate conduct. Managers and leaders are expected to listen carefully to their team members, report concerns as soon as possible, and work with HR to address issues.

If you experience or witness harassment or discrimination, you are encouraged to speak up.

We are all responsible for creating a culture of respect. Every voice matters. Every action counts.

Belonging, Collaboration, Inclusion, and Respect

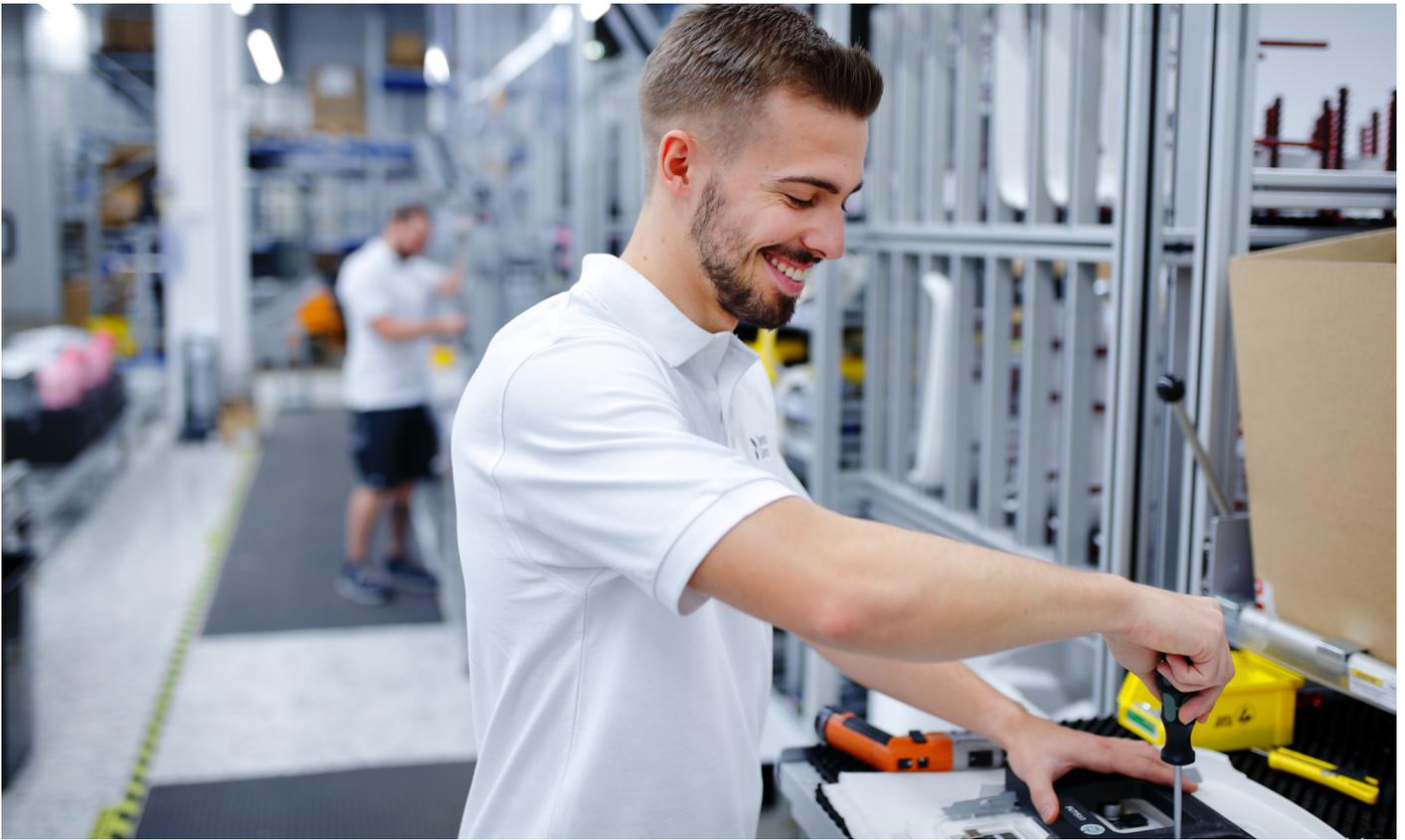
Everyone is welcome, valued, and supported. That's what we mean by belonging. It's not just about being part of a team; it's about knowing your voice matters and your contributions count.

Inclusion means making space for diverse ideas, backgrounds, and experiences. When people feel free to be themselves at work, they're more likely to share ideas, challenge the status quo, and help us grow. Inclusion leads to better teamwork, better decisions, and better results.

Everyone at Dentsply Sirona has a role to play in building this kind of environment by listening to others, treating people fairly, and giving everyone a chance to contribute. We should also be mindful of situations in which someone may be left out or treated unfairly and take steps to address them.

Our leaders play an important role in nurturing an inclusive and respectful culture. We expect our leaders to make fair decisions





and to ensure that no one is overlooked or ignored. Leaders should speak up when they are concerned about bias or unfair treatment and support employees who raise concerns.

We do not allow unlawful discrimination or exclusion of any kind. If you experience or see something that doesn't feel right, you are expected to speak up. Your actions can help create a workplace where everyone feels they belong.

Workplace Safety and Security

Safety is more than a checklist; it's a core part of how we operate. We are committed to providing a safe, secure, and healthy workplace for all employees, contractors, and visitors, wherever they are in the world. This commitment applies to our offices, labs, manufacturing facilities, service centers, and customer sites.

Everyone is responsible for helping to prevent accidents, injuries, and unsafe conditions. We use equipment properly, follow safety instructions, and report hazards or near misses right away. Dentsply Sirona also expects that employees are not impaired by drugs or alcohol while carrying out their job responsibilities. In a global company like ours, we must respect and follow local laws and safety standards in every country where we work.

We take both physical and psychological safety seriously. We do not tolerate harassment, threats, intimidation, or workplace violence under any circumstances. This includes verbal abuse, aggressive behavior, and bringing weapons - both real and replica - into the workplace. Even behaviors that may be legal in some countries may still be inconsistent with our values and violate our policies.

For employees working in clinical settings, following site-specific protocols is essential. These protocols govern the proper handling

of medical and dental products, infection control procedures, and the use of protective equipment, especially when working around patients or sterilized tools.

If you see something that raises safety or security concerns - whether it's a broken workstation in a milling center, repeated lifting injuries in a distribution hub, or emotional distress in a teammate - speak up. Safety is everyone's job. No concern is too small to raise.

Personal Relationships and Conflicts of Interest

Trust is essential to everything we do, especially business decisions. A conflict of interest occurs when your personal, financial, or business interests or relationships could influence, or appear to influence, your decisions at work. Even if the impact seems small, conflicts can be damaging to Dentsply Sirona's interests and reputation, including with customers, clinics, and partners.

Examples of conflicts include, but are not limited to:

- Hiring or supervising a family member or close friend
- Having a financial interest in a supplier or dealer
- Using your position to influence a contract with a former employer
- Getting involved with a side business that competes with Dentsply Sirona.

Conflicts are often unintentional and addressable, but when they aren't disclosed, they can lead to unfair advantages, favoritism, and questions about our integrity. That's why we ask all employees to be transparent and speak up early if something might look like a conflict. In most cases, simple steps, such as changing reporting lines or removing yourself from a decision, can resolve the issue.

If you are unsure whether you have a conflict, you should disclose it by contacting your manager, HR, or Ethics & Compliance.

Our customers, patients, and regulators expect us to act fairly and without bias. Every decision we make must be based on what's best for the business, not what benefits an individual.





Data Privacy

We all play an important role in protecting the privacy of personal data. Personal data includes any information that relates, directly or indirectly, to an identifiable person.

Examples include names, email addresses, phone numbers, health data, or government ID numbers. Other types of data - such as intraoral scans, treatment plans, or customer records - may be considered sensitive under applicable law and require an even higher level of protection.

Dentsply Sirona has adopted a global principles-based approach to meeting our legal and ethical compliance commitments. This approach includes policies, procedures, guidelines and systems designed to help protect data, all of which rely on people doing the right thing.

Never access, share, or store personal data unless it's required for your job, and even then, only use approved suppliers,

platforms or systems. Sending files which contain personal data to a personal email account, saving personal data on a USB drive, uploading company or customer personal information to artificial intelligence (AI) tools, or discussing customer cases in public settings - even unintentionally - can create serious risk.

Dental and medical professionals, patients, and business partners trust us to protect their information. That trust can be lost quickly if data is not handled carefully. If you're ever unsure about whether it's okay to access, share, or store data, ask a Privacy team member or email privacy@dentsplysirona.com.

Responsible AI Use

We are committed to developing, procuring, and using Artificial Intelligence (AI) in ways that are lawful, safe, fair, transparent and accountable. The benefits of AI are broad, but the risks are equally as broad. Use of AI for business is permitted with approved systems and use cases. Before using a specific AI tool, check with your IT partner to ensure it has been approved for your intended use case.

Charitable Donations

Dentsply Sirona supports charitable causes that improve patient health, advance scientific knowledge, and strengthen the communities where we live and work. All donations, whether cash, products, or services, must be made transparently for legitimate charitable purposes and never used to gain an improper business advantage. We do not provide donations to improperly influence a Healthcare Professional, customer, or Government Official. Donations are made only through approved company channels, in accordance with our internal policies and approval processes.

Political Activities and Contributions

Dentsply Sirona respects the right of every employee to participate in the political process as a private citizen. However, to avoid conflicts of interest and ensure compliance with campaign finance and lobbying laws, employees must keep personal political activities separate from their role at the

company. Company resources, facilities, and work time may not be used for personal political activities.

Dentsply Sirona does not make political contributions, whether cash, gifts, in-kind contributions or services, on behalf of the company unless the contribution is pre-approved in writing by the General Counsel and Chief Ethics & Compliance Officer and allowed under applicable law.

Integrity In Action

Look Out For:

- Product claims or marketing materials that are not approved or supported by evidence.
- Repeated comments, gestures, or behaviors that make someone uncomfortable.
- Colleagues dismissing ideas based on language ability, accent, or background.
- Promises to customers that go beyond what our products are cleared, licensed, or approved to do.
- Unsafe equipment, exposed wiring, chemical spills, or poor ventilation.
- Pressure to close a sale by providing incomplete or misleading information, or by offering favors or advantages that violate company guidelines or applicable laws and regulations.
- Using company resources or influence for personal gain.
- Ignoring customer complaints or failing to escalate safety or quality concerns through proper channels.
- Side agreements, unapproved pricing, discounts, or commitments not documented in an official contract.



Our Commitment to the Community

As a global leader in the dental and continence care industry, Dentsply Sirona is part of a larger community that includes patients, healthcare professionals, business partners, and neighbors where we live and work. Our actions – both big and small - have an impact beyond our company. That's why we are committed to operating responsibly, ethically, and in ways that contribute positively to the world around us.

Being a responsible business means protecting the environment, respecting human rights, supporting fair and ethical

labor practices, and ensuring that our products meet the highest standards for safety and quality. It also means understanding and responding to the needs of the Healthcare Professionals and patients we serve around the world.

This section outlines how we live that commitment. No matter your role, whether you're in research and development, customer service, manufacturing, sales, or supply chain, your work contributes to how Dentsply Sirona is seen, and the positive impact we make globally.



Environmental Responsibility

Protecting the environment is an essential part of how we operate and live our values. Through our global sustainability strategy -

BEYOND: Taking Action for a Brighter World - we are working to reduce our environmental footprint and support the Healthy Planet pillar of our sustainability efforts. This commitment applies across our business, from product design and packaging to how we run our facilities and manage energy, water, and waste.

As highlighted in our Sustainability Report, we continue to make progress toward our environmental goals, including lowering greenhouse gas emissions intensity, reducing water withdrawal intensity, and decreasing total waste. We are also advancing long-term goals, such as our ambition to achieve Net Zero carbon emissions by 2050 and to transition to more sustainable, recyclable packaging by 2030. These efforts reflect our belief that environmental responsibility supports both our customers and the communities we serve.

Everyone at Dentsply Sirona plays a role in supporting these goals. You can contribute by minimizing waste, reporting leaks or equipment issues, following safe handling procedures, and complying with all site-specific environmental requirements. Teams involved in engineering, sourcing, operations, sales, and marketing should also consider the environmental impact of their decisions and ensure that any environmental claims are accurate and approved.

To learn more about our commitments and progress, please read the [Dentsply Sirona Sustainability Report](#).

Protecting Human Rights

We believe all people deserve to be treated with fairness, dignity, and respect. Dentsply Sirona does not tolerate forced labor, human trafficking, child labor, or any other form of modern slavery in our operations or supply chain.

Modern slavery is a global issue and can be difficult to detect. It can be hidden in supply chains or subcontracting relationships, especially in industries involving raw materials, packaging, or electronics. Certain raw materials may also be associated with heightened human rights risks, including the potential for conflict financing. For this



reason, we expect all suppliers and third-party partners to comply with our standards and uphold international human rights, including but not limited to the right to freely chosen work, fair wages, and safe working conditions.

We conduct risk-based due diligence on our suppliers. We also require our partners to confirm that they are in compliance with applicable international regulations such as the UK Modern Slavery Act, the California Transparency in Supply Chains Act, and similar laws in Australia, Canada and the EU related to modern slavery and human rights. As part of our supplier due diligence, we consider risks related to conflict minerals and applicable laws that promote transparency in the sourcing of certain minerals from conflict-affected or high-risk areas.

In addition, Dentsply Sirona publishes modern slavery transparency reports in accordance with all applicable legal requirements, including in Australia, Canada, and the United Kingdom.

We all have a duty to remain alert and speak up if we see something concerning. That might include unusually low pricing, poor factory conditions, or workers who appear fearful or underage. Concerns may also involve suppliers that cannot clearly explain where certain raw materials or minerals come from.





Product Quality and Safety

Patients, dental professionals, and continence-care providers trust us to deliver products that are safe, effective, and of the highest quality. We earn and maintain that trust through every decision we make, from how we design, test, and validate our products to how we manufacture, label, distribute, and support them.

Dentsply Sirona complies with quality and safety regulations in all regions where we operate. We also follow Good Manufacturing Practices (GMP), regulatory standards that ensure products are consistently manufactured and controlled to meet quality and safety requirements, and Good Clinical Practices (GCP), international guidelines that ensure clinical research is conducted ethically, protects participants, and produces reliable data.

Quality is not just the responsibility of the Quality Assurance team. All Dentsply Sirona employees - from manufacturing technicians

and engineers to sales representatives and field service teams - have a role to play. Dentsply Sirona expects all employees to report deviations or defects, follow procedures precisely, keep accurate records, and never take shortcuts that could compromise product quality and safety.

If you become aware of an issue that could affect product quality or safety, you must report it immediately through the appropriate channels. These reports help us act quickly to investigate, correct problems, and make any required regulatory notifications. Delaying or failing to report concerns puts patients and users at risk and may lead to fines, recalls, or loss of trust.

Research Ethics

We are committed to conducting research with honesty, transparency, and scientific integrity. Our research activities, whether clinical trials, product testing, or user evaluations, play a critical role in improving dental and continence care and bringing safe and effective products to the market. To maintain trust with patients, Healthcare Professionals, regulators, and each other, our research must meet the highest ethical, scientific and legal standards.

Research ethics begins with respect for the rights, safety, and privacy of participants. All research involving human subjects is expected to comply with applicable laws, international standards, and regional and local requirements.

We must ensure that participants give informed consent, fully understand the risks and benefits of participating, and are free to withdraw at any time. This is especially important when studies are conducted across countries and cultures. Language barriers, power dynamics, and access to information can affect how participants experience research. We have a duty to design and conduct studies in a way that protects and respects all participants.

Accuracy in data collection and reporting is also essential. Research results must reflect what actually happened, not what we hoped would happen. Falsifying or omitting data, reusing images or graphs without disclosure, or failing to report unexpected results undermines scientific integrity and can delay or prevent important safety improvements.

We are also committed to responsible and ethical treatment of animals in research. Where animal testing is required by legislation for certain types of medical

devices, it is conducted only through qualified third parties and in compliance with applicable animal welfare laws, ethical standards, and regulatory requirements. We seek to minimize animal use and support alternatives wherever possible.

Employees involved in research - whether directly or through support roles - must follow protocols carefully and maintain proper documentation. If you have concerns or suspect something isn't right, speak up.

Integrity In Action

Look Out For:

- Leaks, spills, or emissions from equipment or facilities that could harm the environment.
- Unsupported and/or unapproved environmental claims in sales, marketing, or customer conversations.
- Suppliers offering unusually low prices that seem inconsistent with fair wages or safe working conditions.
- Resistance from a supplier when asked to provide proof of labor practices or to certify compliance with our Business Partner Code of Conduct.
- Incorrect or incomplete product labelling, instructions for use, or packaging.
- Clinical trials being conducted without documented ethical approval from the appropriate review body (e.g., Institutional Review Board, Research Ethics Committee).



Our Commitment to Stockholders

Dentsply Sirona is trusted by stockholders, investors, and other financial stakeholders around the world. These individuals and institutions rely on us to act responsibly, manage resources wisely, and report our business performance honestly and accurately. That trust is earned and maintained through our daily actions.

We are committed to making decisions that reflect our values and protect our long-term reputation. We strive to maintain

strong financial controls, prevent fraud and corruption, and comply with all applicable laws and reporting obligations. We operate transparently and we hold ourselves accountable when things go wrong.

Every employee plays a part in protecting Dentsply Sirona's financial health and reputation. Whether you work in Finance, Sales, IT, Manufacturing, Field Support or in another department, ethical conduct is a core responsibility.



Anti-Bribery & Anti-Corruption

Dentsply Sirona complies with all applicable anti-bribery and anti-corruption laws wherever we do business. We strictly prohibit offering, promising, authorizing, or giving anything of value, directly or indirectly, to anyone we do business with – including,

but not limited to, Government Officials, Healthcare Professionals, procurement officers, and individuals working in the private sector - to improperly influence a decision or to obtain an unfair advantage. Not only are employees prohibited from making improper payments, but distributors, consultants, and other third parties are also prohibited from making such payments on Dentsply Sirona's behalf or for our benefit. We similarly do not tolerate accepting anything of value if it could

improperly influence, or appear to improperly influence, a business decision.

Improper payments, or “bribes,” are not limited to cash. They can also take the form of “anything of value.” For example, gifts, job opportunities, and charitable donations may constitute bribes if they are offered with the intent to obtain an improper business advantage. In our industries, bribery and corruption risks can arise, for example, with regards to product tenders, hospital bids, facility inspections, transportation and clearance of products, training sponsorships, customer consulting arrangements, or continuing education events. All business dealings must be fair, transparent, and well-documented.

We also prohibit facilitation or “grease” payments - small payments made to speed up routine government actions - even if they may be allowed under local law.

Before offering or accepting anything of value, or if you are uncertain whether an activity is permissible, seek guidance from Ethics & Compliance.

Accurate Records & Financial Integrity

At Dentsply Sirona, we are required to maintain complete and accurate books, records, and accounts. This includes not just financial reports, but also time entries, quality logs, shipment documents, expense claims, contracts, and regulatory filings, among others. Records must be maintained in reasonable detail and conform with all applicable laws, regulations and company policies. Never record false information, maintain unrecorded funds or assets, hide costs, inflate or understate figures, or delay reporting.

Decisions about pricing, production, and product launches often rely on the data we maintain. If those records are inaccurate,

it can lead to poor business decisions, compliance issues, or even civil or criminal penalties. That’s why we must follow our internal controls, approval processes, and documentation standards carefully.

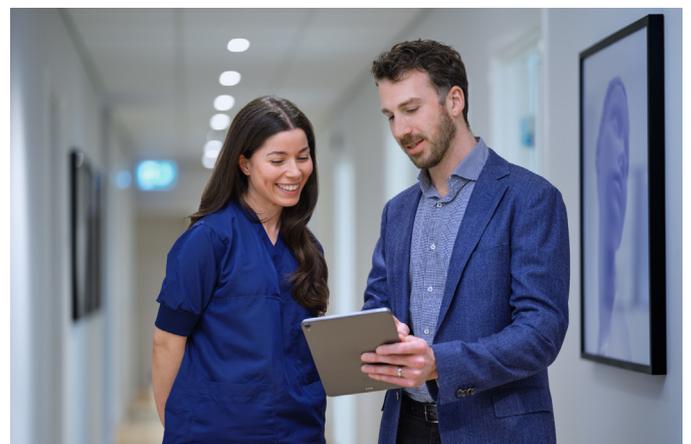
If you’re unsure about how to handle something such as split billing for a customer or allocating a travel expense, ask Finance or Ethics & Compliance. We expect you to speak up if you suspect errors, omissions or manipulation of records, even if it’s outside your department or responsibilities.

Fraud Prevention

Fraud is any act of deception done to gain something of value, such as money, time, goods, or services. It can take many forms, including falsified records, inflated expense reports, improper revenue recognition, merchandising, misuse of company assets, or hiding mistakes. Even small acts of fraud harm the company, damage our culture and reputation, and may lead to criminal charges.

We are committed to detecting and preventing fraud through our internal controls, auditing and monitoring activities, and clear policies. However, the most effective protection comes from employees who are alert and honest in their work.

If you become aware of fraud or are asked to do something that doesn’t feel right, speak up.





Insider Trading

As a publicly traded company, Dentsply Sirona must protect the integrity of financial markets by ensuring that material, non-public information is not used for personal gain. Insider trading occurs when someone buys or sells company stock based on important information that is not publicly available, or when someone shares that information with another person who then trades on it.

Material information is anything that a reasonable investor would consider important in making an investment decision. This could include financial results, product recalls, mergers or acquisitions, leadership changes, regulatory actions, or the launch of a new dental or continence-care technology.

It is illegal and against company policy for you to trade the stock or securities of Dentsply Sirona or other companies while in possession of inside information about such company. It is also illegal to “tip” others, such as friends, family, or colleagues, by sharing confidential

details that could influence their trading decisions.

Employees across the company may obtain access to inside information in the regular course of their job responsibilities. For example, finance staff preparing earnings reports, legal teams managing litigation, or R&D teams working on pre-launch products may all learn of material, non-public information. In addition, certain designated employees are subject to blackout periods - specific times when trading Dentsply Sirona securities is prohibited - regardless of whether they believe they have inside information and such employees are required to pre-clear any trades in Dentsply Sirona securities. Employees will be notified if they are subject to trading blackout periods and pre-clearance requirements. These restrictions are set to prevent even the appearance of improper trading.

If you have any doubt about what you know, whether a blackout period applies to you, or when you can trade, contact the Corporate Legal department before taking any action.

Antitrust and Competition Laws

Fair competition is essential to healthy markets and consumer trust. Dentsply Sirona is required to comply with all antitrust and competition laws in the regions where we operate. These laws protect customers and ensure businesses compete based on merit, not manipulation or collusion.

We must never engage in practices that limit competition, including price-fixing, bid-rigging, dividing territories or customers, or coordinating product launches with competitors. Even informal conversations with competitors - for example, at trade shows, conferences, or industry meetings - can lead to violations if they involve sensitive topics like pricing, discounts, or market strategy.

In the dental and continence-care industries, risks can arise when Dentsply Sirona employees participate in regional tenders, group purchasing agreements, exclusive distribution deals, or even industry meetings and conferences. Consult Legal or Ethics & Compliance when working with third parties, partners, or procurement teams to ensure agreements satisfy local laws and regulations. Violating antitrust or competition laws can

result in severe penalties for the company and individuals, including fines, loss of contracts, and civil and criminal prosecution.

Anti-Money Laundering

Money laundering is the process by which funds from illegal activities are moved through legitimate businesses to hide their true source and make them appear legitimate. We have zero tolerance for money laundering and avoid business relationships with third parties that may be involved in these activities. We comply with all anti-money laundering laws and expect employees to report suspicious activity. Red flags include third parties who request unusual payment terms, use unrelated intermediaries, insist on cash transactions, or attempt to route payments through multiple accounts or countries without explanation. Global businesses like ours must stay alert to unusual financial behavior, especially in markets where anti-money laundering controls may be less mature.

If something seems unusual or suspicious, pause and consult Ethics & Compliance. It's always better to ask questions than to take an unnecessary risk.



Cybersecurity

Our systems and data are essential to delivering safe and effective products and services. Cybersecurity protects our intellectual property, clinical data, patient privacy, and internal operations.

Cyber threats can come in many forms such as phishing emails, ransomware, unauthorized access, or data theft. Attackers often target employees by impersonating trusted sources, asking for login credentials, or inserting malicious links in emails. Even

a small mistake, like opening a fake invoice or using a weak password, can have serious consequences.

We are all responsible for protecting our digital environment. This includes using strong passwords, locking screens when away from devices, reporting suspicious emails, and following our IT security protocols. Only use approved systems and cloud platforms for work-related communications and data storage.

Consult the IT-Cybersecurity team with any questions or for more information.

Integrity In Action

Look Out For:

- Offers or requests for cash, gifts, or hospitality to influence a decision.
- Hospitality, sponsorships, lecturing opportunities or travel offered to healthcare professionals in exchange for purchasing Dentsply Sirona products.
- Orders, sales, or revenue entries recorded before customer confirmation or without proper documentation.
- Inaccurate entries, misclassifications, or unexplained discrepancies in financial reports, budgets, or forecasts.
- Requests to falsify records, backdate documents, or hide information.
- Buying or selling shares of Dentsply Sirona or other companies while aware of material, non-public information about such companies.
- Coordinating product launches, promotions, or bids with competitors.
- Complex or unnecessary routing of funds through unrelated third parties.
- Clicking on links or attachments from unknown or suspicious senders.

Commitment to External Parties & Stakeholders

Our business runs on trust, trust from patients, from Healthcare Professionals, from our customers and business partners, and from governments around the world. Because our customers are at the center of everything we do, every external interaction reflects on Dentsply Sirona. We earn trust by being clear about our standards, following the law, documenting our actions, and making choices that put patient safety, fairness, and integrity first.

That is why we hold ourselves, and those who represent us, to the highest ethical and legal standards. This section explains how we build responsible relationships with third-party partners and Healthcare Professionals; how we follow global trade rules; how we interact with governments and regulators; and how we meet our transparency and reporting obligations.



Customers

At Dentsply Sirona, customers are at the center of everything we do, and that includes not only the people and organizations who purchase our products, but also the patients who ultimately depend on them. Whether someone is a Healthcare Professional, a distributor, a public institution, or a patient receiving care, they rely on us to deliver safe, effective, and honestly represented solutions that support better health outcomes.

Across all customer groups, we are committed to providing accurate information, honoring our commitments, and competing fairly in the marketplace. We never misrepresent product performance, make unsupported claims, or promise outcomes we cannot deliver. By treating customers and the patients they serve with honesty, professionalism, and respect, we strengthen long-term relationships and reinforce trust in our brand.



Third-Party Partners

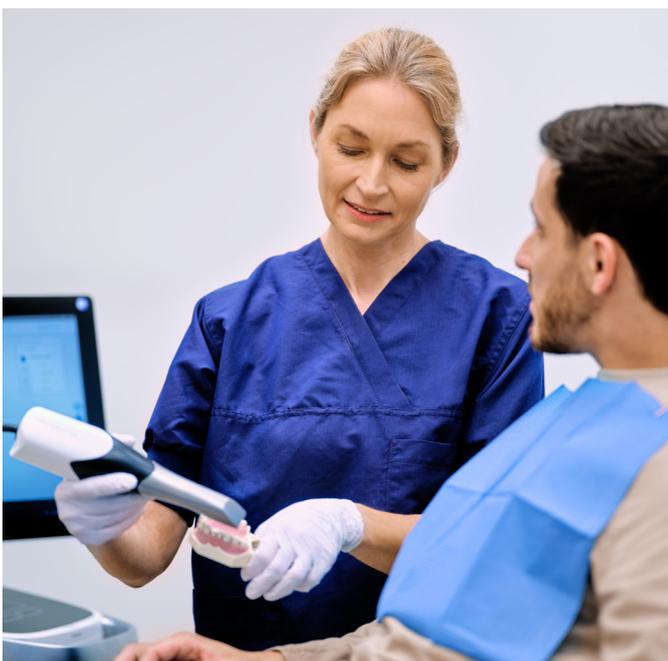
We depend on trusted partners to reach customers and support patients worldwide. Because third parties often act as an extension of Dentsply Sirona, their conduct can create legal, financial, and reputational risk for us.

Who Are “Third Parties”?

Third parties include distributors, dealers, consultants, contractors, suppliers, agents, and anyone else who represents us or acts on our behalf. Their conduct can create risk for Dentsply Sirona, so we expect them to uphold the same principles of integrity that apply to all of us. We choose partners carefully, set clear expectations, monitor performance, and act quickly if concerns arise.

Dentsply Sirona requires its third-party partners to comply with the Business Partner Code of Conduct and other company policies.

If something does not look right, such as unusual payment requests, vague ‘facilitation’ offers, or resistance to compliance reviews, seek guidance from Ethics & Compliance. Our aim is simple: partner only with organizations that share our commitment to *Advancing with INTEGRITY*.



Healthcare Professionals

Healthcare Professionals are a critical customer group and central to our mission. They rely on us for safe and effective products and accurate information that supports patient care. Our relationships with HCPs must be grounded in clinical purpose, transparency, and compliance with all applicable laws, regulations, and industry standards in every country where we operate.

When we provide Healthcare Professionals with education or training, engage them as speakers or consultants, or support their scientific activities, the work must address real clinical needs, be based on fair market value, be properly approved, and be fully and accurately documented. These standards protect patients, safeguard our reputation, and help ensure that clinical and purchasing decisions are made for the right reasons.

Government Interactions

We engage with governments and regulators in many ways, for example, when we are seeking licenses and approvals, responding to inspections or audits, participating in tenders, and fulfilling reporting requirements. Every interaction must be professional, transparent, and ethical. We must never offer, promise, or provide anything of value, directly or indirectly, to improperly influence a government decision or action. Only authorized Dentsply Sirona employees may represent Dentsply Sirona in discussions with regulators or Government Officials, and any information we provide - whether in conversations, documents, or formal submissions - must be complete, timely, and truthful. If you are ever asked to act in a way that conflicts with these standards, stop immediately and escalate the concern.



Business Courtesies

Meals, travel, entertainment and gift giving, what we call “business courtesies,” can sometimes support professional relationships with our customers and business partners, but must never be used, or appear to be used, to improperly influence a business decision. All such courtesies must be modest, infrequent, and tied to a legitimate business, cultural, educational or scientific purpose.

Special rules apply for Healthcare Professionals and Government Officials.

Similarly, Dentsply Sirona employees must take care when accepting gifts, meals, or other business courtesies from vendors and suppliers. Such items must never influence, or be perceived to affect, our business judgment.

When in doubt, always ask Ethics &

Compliance before giving or accepting anything of value.

Transparency & Reporting

Transparency builds trust in healthcare. Many countries require companies to record and, in some cases, publicly report certain payments or transfers of value to Healthcare Professionals and organizations. We meet these requirements by capturing accurate and complete information - including consulting fees, sponsorships, educational support, travel, and meals - in our systems and by filing required reports on time. This supports ethical decision-making, protects our reputation, and helps patients and Healthcare Professionals have confidence in our products and practices.



Global Trade Compliance

Dentsply Sirona operates in more than 100 countries and ships products globally. As a result, our business must comply with a wide range of export controls, customs regulations, and international sanctions regimes that vary by market and change frequently.

We are committed to complying with all

applicable laws and regulations. We take great care with cross-border shipments, technology transfers, sanctioned-party screening, and properly classifying and valuing goods. When an authorization or license is required, we secure it before proceeding. We ensure all labelling and supporting documentation is accurate and complete. If there is any doubt about a transaction or engagement, we must stop and consult with Ethics & Compliance before taking further action.

Integrity In Action

Look Out For:

- Ignoring customer complaints or failing to escalate safety or quality concerns through proper channels.
- Promises to customers that go beyond what our products are cleared, licensed, or approved to do.
- Requests for cash, off-contract payments, or payments to offshore or personal accounts.
- Close or undisclosed ties to Government Officials or healthcare providers.
- Educational or promotional events without a clear scientific or clinical purpose.
- Incomplete or inaccurate documentation of transfers of value (for example, honoraria, sponsorships, or travel).
- Requests from officials for luxury gifts, personal travel, or cash payments.
- Meals, travel, or entertainment that seem excessive or are intended to influence a key business decision.
- Failure to log HCP-related expenses or transfers of value in approved company systems.
- Requests to ship products, software, materials, or equipment to embargoed or sanctioned countries.



Speaking Up

At Dentsply Sirona, *Advancing with INTEGRITY* means more than simply following the rules, it means creating a culture where everyone feels safe to raise questions and concerns. Speaking up is how we protect one another, our patients and customers.

Silence can allow small problems to grow into serious risks. That is why we expect every employee, at every level, to use their voice when something doesn't seem right. We also encourage other stakeholders, including our customers and business partners, to similarly report any concerns they have with Dentsply Sirona to the company.

Speak Up – Your Voice Matters

When you raise a concern, you are helping Dentsply Sirona live our values. Whether it is a question about a sales practice, a safety issue in manufacturing, or something you witness at a customer event, speaking up is the responsible thing to do. All concerns must be raised in good faith.

Dentsply Sirona will treat reports confidentially and promptly investigate the concerns raised. Violations of the Code, our policies and procedures, or applicable laws and regulations may result in disciplinary action, which may include coaching, employee education, job responsibility limitation, increased management oversight, or termination.



Manager Responsibilities

Managers have an additional responsibility to ensure employees' concerns are heard and addressed fairly and objectively. If an employee raises a concern, managers must:

- Listen carefully and give the employee their full attention.
- Take the concern seriously and treat every issue with respect.
- Thank the employee for speaking up, as raising a concern takes courage.
- Avoid making assumptions or judgments before the facts are known.
- Not investigate on their own. Escalate the concern promptly through the proper channels (HR, Ethics & Compliance).
- Protect confidentiality by sharing information only with those who need to know.
- Never retaliate - or allow others to retaliate - against someone who raises a concern or participates in an investigation. If you suspect retaliation, report it immediately.
- Not attempt to identify an anonymous reporter. Any effort to determine the identity of someone who submits a concern anonymously is strictly prohibited and may be considered retaliation.



How to Speak Up

We offer multiple ways to raise concerns so you can choose what feels safest and most effective:

- Your manager (or another manager if your direct supervisor is involved)
- Your HR business partner
- Ethics & Compliance
- Our [Ethics & Compliance Hotline](#) — available globally, 24/7, online and by phone, in multiple languages, managed by an independent, external provider with an option to report anonymously where permitted by law.
- Email Ethics & Compliance at compliance@dentsplysirona.com

You may also report your concerns externally. Nothing prohibits you from communicating with government agencies about possible violations, including filing a complaint and/or participating in a government investigation.

Our Commitment Against Retaliation

Dentsply Sirona strictly prohibits any form of retaliation against anyone who either raises a concern in good faith about potentially illegal, unethical, or non-compliant conduct, or who cooperates in a company or government investigation. Prohibited retaliation includes actions like demotion, discipline, reduced hours, or exclusion from professional development opportunities. If you believe you are experiencing or have witnessed retaliation, report it immediately through any of the available reporting channels. Employees who retaliate against others for reporting concerns or cooperating with investigations will be subject to disciplinary action, which may include coaching, employee education, job responsibility limitation, increased management oversight, or termination.

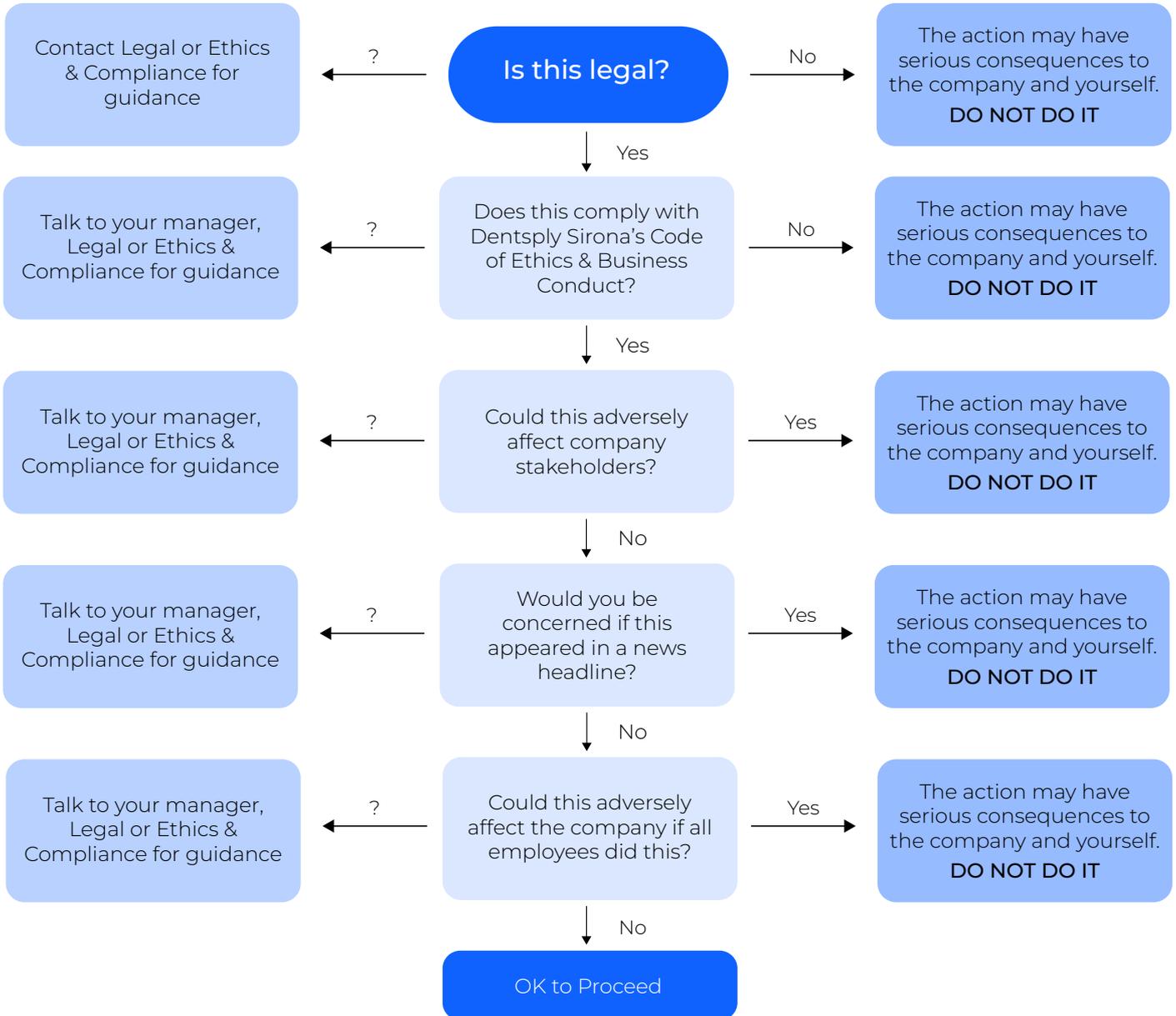
Integrity In Action

Look Out For:

- Behavior that feels unsafe, unethical, disrespectful, or inconsistent with our values.
- Pressure to ignore or hide issues rather than report them.
- Managers dismissing or discouraging questions or concerns.
- Signs of retaliation against someone who raised a concern in good faith or participated in an investigation.
- Reports of misconduct that are not escalated through the proper channels.
- Uncertainty about whether a situation violates company policy or the law.

Decision Guide

Not sure whether to speak up? Use the Decision Tree to help you decide. If something feels unsafe, unethical, or inconsistent with our values, it is worth speaking up.



Examples of When to Speak Up

- You notice a product shipment left the warehouse without proper quality checks.
- A dental professional at a trade show offers gifts in exchange for preferential pricing.
- A colleague is making offensive remarks.
- You see patient data being shared through an unapproved file-sharing app.

- You suspect a supplier may be using underage or unsafe labor practices.

In every case, the right action is to raise the concern promptly through one of our reporting channels. Managers and employees should not attempt to investigate concerns themselves; all issues must be reported, even if you are unsure whether misconduct has occurred.





Your Responsibilities

Our Code of Ethics and Business Conduct is only as strong as our commitment to follow it. Each of us, regardless of title, role, or location, must take responsibility for living up to the standards described in this Code. Together, we shape how Dentsply Sirona is seen by patients, customers, partners, and communities around the world. By *Advancing* with **INTEGRITY** we build and strengthen trust and ensure that our success is sustainable.

Each of us must understand and agree to abide by this Code and the related policies that support it. This means taking time to read it, asking questions when we are unsure, and using available resources when necessary to put it into action. Real-world situations can be complex, so when uncertainty arises, we must use good judgment, ask questions, and seek guidance to make informed decisions.

We must act with integrity in everything we do. This includes being truthful and transparent, conducting business ethically, and making decisions for the right reasons even when it is difficult. By doing so, we protect not only ourselves but also Dentsply Sirona.

We must speak up when something does not seem right. Turning a blind eye can allow problems to grow. We should raise concerns when they arise and support a culture where everyone feels safe doing the same. Retaliation against anyone who reports in good faith is never acceptable.

We must complete required compliance training and certifications on time and apply what we learn in our daily roles. These programs help us recognize risks, respond appropriately, and uphold our obligations to patients, customers, regulators, and to each other.

Finally, we should always consider the impact of our actions. Each decision we make affects

customers, colleagues, communities, and the company. We must always ensure our actions contribute to a culture of respect, safety, and inclusion.

Additional Responsibilities for Leaders

If we manage others, we take on additional responsibilities. Leaders must set the tone by modelling ethical behavior, reinforcing the importance of the Code and related policies with their teams, and ensuring their teams complete required training. Leaders must also create an environment where questions are encouraged, concerns are heard, and issues are addressed promptly. By doing so, we help build trust and accountability and foster a culture of *Advancing* with **INTEGRITY** throughout the company.

When we all take responsibility for *Advancing* with **INTEGRITY**, we protect patients, support each other, and build a company we are proud to be part of.

Integrity In Action

Look Out For:

- Treating compliance as a checkbox exercise rather than a daily responsibility.
- Ignoring the Code or related policies when making business decisions.
- Failing to seek guidance when you are unsure about the right course of action.
- Staying silent when you see conduct that does not align with our values.
- Assuming someone else will raise a concern instead of speaking up yourself.
- Cutting corners to meet business goals.
- Leaders dismissing or overlooking concerns raised by their teams.



Dentsply Sirona Global Headquarters
13320-B, Ballantyne Corporate Pl
Charlotte, NC 28277
USA