



Forced Labour Report: Straumann Canada Ltd.

1. Introduction

This Report is submitted by Straumann Canada Ltd. (the "Company", "we" or "our") in compliance with Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"). It describes the measures the Company has taken to monitor and address forced and child labour in its supply chains during the period January 1, 2023 to December 31, 2023.

2. About the Company

We are a Canadian subsidiary of Swiss holding company, Straumann Holding AG, together with its global subsidiaries known as "Straumann Group". The Straumann Group companies specialize in the manufacture and distribution of dental implants, prosthetics, and orthodontic solutions. Straumann Group is a leading global provider in the field of implant dentistry, offering a wide range of products and services to dental professionals worldwide. Its products include dental implants, tissue regeneration products, prosthetics, and digital solutions, among others.

3. Our Supply Chains

We function as the sole distributor in Canada of products manufactured by Straumann Group entities located in Europe, Brazil and the US. These products include dental implants, abutments, biomaterials, treatment planning software, clear aligners and dental prosthetics (crowns, bridges etc.).

The products we distribute in Canada contain diverse inputs, including digital intra-oral scanners and certain biomaterials. These inputs are sourced globally from numerous suppliers. All of Straumann Group's supplier relationships are governed by Straumann Group's values, policies and procedures discussed further below.

4. Addressing Forced and Child Labour in Our Supply Chains

We are guided by and act in accordance with the values and policies of Straumann Group. These values include trust, integrity, respect, sustainability, and transparency. We are committed to maintaining the highest ethical standards, including respecting human rights in all our business dealings, and the elimination of forced and child labour in our supply chains. Straumann Group requires all its subsidiaries to comply with its Code of Conduct and all its business partners (including suppliers) to comply with its Code of Conduct for External Business Partners.

Straumann Group's Code of Conduct outlines the guiding principles and standards of behavior expected from its employees, contractors, and business partners. It emphasizes the importance of treating others with respect, dignity, and fairness, regardless of differences in background or status, and prohibits unethical or illegal business practices.

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The Code of Conduct also describes Straumann Group's Compliance Hotline for reporting suspected violations of the Code of Conduct, internal regulations, the law or other external regulations. Straumann Group investigates such reports according to its internal procedures that are in line with the applicable national laws and regulations. Straumann Group thoroughly investigates such reports and takes immediate action to remediate violations.

Straumann Canada employees may access the internal "SpeakUp® Line" to report violations and suspected violations of Straumann Group's Code of Conduct both online and via phone in English and in French.

- (a) Straumann Group Code of Conduct for External Business Partners ("ExBP Code")

Straumann Group's ExBP Code outlines the ethical standards and expectations for suppliers, distributors, consultants, and other external partners. Among other requirements, the ExBP Code requires external partners to:

- Respect and uphold human rights in their operations, including the prohibition of child labor, forced labor, and discrimination. In particular, the ExBP Code provides that external business partners shall have no reasonable suspicion that there is child labor or forced labor in their organization or supply chain. External business partners are expected to uphold administrative processes to exclude activities within their organization or supply chain associated with slavery or human trafficking.
- Comply with all applicable laws, regulations, and industry standards in their business activities.
- Conduct business with honesty, integrity, and transparency, avoiding any form of corruption, bribery, or unethical behavior.
- Report any suspected violations of the Code of Conduct or other ethical concerns, providing channels for reporting and addressing issues promptly.

The ExBP Code is made available to all external business partners in English, and Straumann Group may ask certain external business partners to extend this Code to selected sub-suppliers. External business partners are expected to abide by the provisions of the ExBP Code as a precondition to doing business with Straumann Group. Straumann Group may monitor certain external business partners to evaluate their compliance with the ExBP Code. Straumann Group's major external business partners are required to sign the ExBP Code periodically as written confirmation of their commitment to abide by its provisions.

Non-compliance by an external business partner with the provisions and requirements of the ExBP Code is treated as a violation of substantial contractual obligations. If the ExBP fails to correct this non-compliance, Straumann Group is committed to seeking an alternative external business partner who is willing and able to comply with the ExBP Code.



The Straumann Group Compliance Hotline for External Business is available for reporting potential violations of the ExBP code, and can be accessed via this link:

<https://www.straumann.com/group/en/home/investors/corporate-governance/code-of-conduct/contact-us.html>.

(b) SpeakUp® Lines

The Straumann Group's SpeakUp® Lines are confidential reporting channels provided to employees, business partners, and other stakeholders to report any concerns or suspected violations of the company's Code of Conduct or ethical standards. They allow individuals to raise issues related to fraud, corruption, harassment, discrimination, safety violations, or any other unethical behavior, including any suspected incidence of forced or child labour in Straumann Group's supply chain.

Our SpeakUp® Lines are operated by an independent third-party provider, ensuring anonymity and confidentiality for those who wish to report concerns. Reports can be submitted online or via telephone, and individuals have the option to remain anonymous if they choose.

Once a report is submitted, it is reviewed and investigated by the appropriate authorities within the company, with the goal of addressing the issue promptly and taking appropriate corrective action if necessary. The SpeakUp® Lines play a critical role in promoting transparency, accountability, and a culture of integrity within the organization, reinforcing the company's commitment to ethical conduct and responsible business practices.

(c) Training

All employees of the Company receive mandatory training in Straumann Group's Code of Conduct.

(d) Supply Chain Monitoring and Due Diligence

We maintain internal accountability and reporting processes set out in Straumann Group's Code of Conduct, as well as the SpeakUp® Lines, which are designed to monitor and address situations where employees, contractors, suppliers, or others along the supply chain fail to demonstrate our values and ethics.

Should concerns arise, including in respect of forced labour or child labour in our supply chains, parties should use our SpeakUp® Lines.

5. Addressing and Remediating Forced Labour or Child Labour in our Supply Chains

As of December 31, 2023, we have not faced situations of forced labour or child labour in our supply chains. As such, we have not had to remedy such situations.

6. Attestation

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In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Andreas Meier
Director, Straumann Canada Limited
May 15, 2024

I have the authority to bind Straumann Canada Ltd.