

Wellspect Business Partner Code of Conduct

Wellspect expects all its Business Partners to adhere to the principles set forth in this business partner code of conduct (the “Wellspect BPCC”) and to ensure that these requirements are upheld throughout their entire supply chain, including their suppliers, sub-suppliers, and any additional tiers of suppliers involved.

Wellspect is a wholly owned subsidiary within the Dentsply Sirona Group of companies and the Wellspect BPCC is in addition to the Dentsply Sirona Business Partner Code of Conduct, set forth here: [Dentsply Sirona Business Partner Code of Conduct EN.pdf](#) (the “DS BPCC”). Thus, any references to Dentsply Sirona in the DS BPCC, or other applicable Dentsply Sirona policies referred to herein, shall be interpreted as references to Wellspect, insofar as they relate to Wellspect. Additionally, any references to “Wellspect” in the Wellspect BPCC shall include Dentsply Sirona when and where relevant.

Business Partners are expected to conduct their business in compliance with the Wellspect BPCC, the DS BPCC, and all applicable laws, regulations and standards in the countries in which they operate. If a topic is covered by both applicable national legislation, the Wellspect BPCC and/or the DS BPCC, then the stricter regulation shall apply

“Business Partner” shall for the purposes of the Wellspect BPCC mean the legal entity specified at the signature section below.

We Believe Our Business Partners Should Share Our Commitment to Ethically Responsible Conduct

Our Business Partners include suppliers of goods and services, distributors of our products, consultants who help us interact with Government agencies, as well as key opinion leaders assisting us globally in developing new products and speaking on our behalf. Our shareholders, customers, employees, and even the communities where we work and live, expect honest and ethical conduct from us every day. We believe that it is vital that we and our business partners conduct ourselves in a manner that is ethical, consistent with all applicable laws, and that abides by the sound business practices that we promote.

All internationally recognized human rights, as expressed in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the ILO Declaration on Fundamental Principles and Rights at Work, shall be respected. This commitment extends to our business practices and partnerships.

The Wellspect BPCC is based on the principles and guidelines set forth by the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and the UN Convention against Corruption. These frameworks guide our efforts to uphold ethical standards, ensure responsible business conduct, and combat corruption.

The Wellspect BPCC reaffirms our commitment to the development of relationships based on integrity by outlining what we expect from our business partners, and what our business partners can expect from us.

Wellspect, through our board of directors, senior management, and all of our employees, is committed to our core values, and to the highest standards of integrity and full compliance with the regulations, laws, and policies that impact and apply to our business and how we do it. We expect that our business partners will

conduct business in the same manner, always demonstrating the highest ethical standards. We have no tolerance for ethical violations. We expect the same from each and every business partner, and will accept nothing less.

Our Principles for Ethically Responsible Conduct

The Dentsply Sirona Code of Business Conduct and Ethics, which can be found here: [Dentsply Sirona Code of Ethics and Business Conduct EN.pdf](#) and to which Wellspect is subject, together with our specific business policies, provides our employees, suppliers and other business partners with a framework for understanding what we expect of them in terms of conduct and decision-making. It outlines key principles and behaviors that are supportive of and derived from our core values. Our principles for ethically responsible business partner conduct flow from our Code of Business Conduct and Ethics and contain principles and behaviors that serve to define our relationship with our business partners, regardless of whether you supply us or another of our business partners with a product, business service or serve as a speaker, opinion leader or consultant. We expect you to share these principles and behaviors, and to promote them with all of those with whom you do business.

Our basic goals at Wellspect are to:

- Be consistently compliant - around the globe – with all applicable laws as well as all policies of Wellspect
- Provide a safe workplace
- Be good corporate citizens and good neighbors in the communities where we work, operate, and live
- Promote basic human rights and dignity and assure that those with whom we conduct business also respect and support this principle
- Be forward looking as we develop new products and services and enhance or improve our existing products and services
- Always strive for continuous improvement
- We expect our business partners to share in our values and goals and to abide by this entire policy, and to make it available and known throughout their organization, and to train their employees on this policy or their own policy embracing these same policies and values, to ensure that all employees comply with this policy in its entirety. Lastly, if anyone becomes aware of any violation (or even a potential violation) of this policy, it will be reported to Wellspect as promptly as possible.

Human Rights and Labour Standards

We expect our employees and our business partners to treat everyone with dignity and respect. Through our core values, we demonstrate our commitment to be a good global citizen and acting in a socially responsible way wherever we live and work, and we expect our business partners to do the same. We require our businesses and our business partners to provide clean and safe work environments and conditions for all workers, forbid child labor, and require that all workers receive all rights and benefits required by law, international and national conventions in the area of fundamental rights. This incorporates, but is not limited to, support the freedom of association, the right to collective bargaining, protection of children and mothers and the right to form works' councils. Also, the supplier is expected to adopt an open attitude towards the activities of trade unions and their organizational activities. Equal opportunity and fair treatment should be extended to all, and a to foster a culture of diversity and inclusion is encouraged.

Wellspect will not tolerate discrimination based on, but not limited to, age, color, disability, ethnicity, marital or family status, national origin, race, religion, sex, sexual orientation, veteran status, or any other characteristic protected by law.

Suppliers' working hours shall comply with national laws and local industry standards, and wages and other benefits provided by supplier must be fair and at least equal to the minimum relevant legal and industry standards.

In addition to the Conflict Minerals provisions of the U.S. Dodd-Frank Act of 2010, Wellspect supports global efforts to address the issues of slavery and human trafficking through our internal policies as well as through direct actions with our business partners in our supply chain. We expect all of 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 the Australian Modern Slavery Act of 2018 and the Uyghur Forced Labor Prevention Act of 2022.

Child Labor

Wellspect does not accept child labor or any form of exploitation of children. Business partners must strictly follow legal requirements and ILO Convention No. 138 on the minimum age for work. Employment should not be offered to anyone under 15 years of age (or 14 where national law allows) or below the country's legal minimum age if higher. Business partners are expected to actively prevent all forms of child labor and exploitation within their sphere of influence.

Forced Labor

Wellspect does not accept any form of forced labor, bonded labor, or involuntary prison labor. Business partners must ensure they do not engage in or support any form of forced labor, including debt bondage, involuntary prison labor, human trafficking, and other forms of modern slavery, as set forth in ILO Conventions No. 29 and 105. Business partners are expected to take measures to prevent any form of forced labor and ensure compliance with these standards.

Health and Safety

We require all business partners, suppliers, and sub-suppliers to provide a safe and healthy working environment for their employees. Business partners should take appropriate action to monitor, report and prevent potential workplace accidents, incidents, near misses and illness.

Business partners must adhere to the principles of ILO Convention No. 155, ensuring the formulation, implementation, and periodic review of a coherent policy on occupational safety, health, and the working environment. Business Partners are expected to prevent occupational accidents and diseases by identifying and mitigating risks, including fire, explosion and security, natural hazards such as earthquakes and extreme weather, exposure to physical hazards e.g. repeated muscular-skeletal activity, noise, moving machinery, providing appropriate training, and promoting a culture of safety.

In line with ILO Convention No. 170, business partners must ensure the safe use of chemicals at work by evaluating hazards, providing necessary information to employers and workers, and implementing safety measures, such as personal protective equipment, to prevent chemically induced illnesses and injuries.

Business partners must comply with the principles of ILO Convention No. 148, taking measures to protect workers from occupational hazards related to air pollution, noise, and vibration. Business partners are committed to preventing and controlling these hazards to ensure a safe working environment.

All business partners, suppliers, and sub-suppliers must comply with all applicable local laws and regulations related to health and safety. This includes adhering to national and regional standards that may exceed the requirements outlined in this code of conduct.

Our commitment to health and safety extends to our entire supply chain. We expect our business partners, suppliers, and sub-suppliers to uphold these standards and continuously strive to improve their health and safety practices to create a safe and healthy workplace for all.

Environment

Wellspect Business Partners are expected to contribute to a sustainable society including a commitment to optimize the use of energy and natural resources of their business, minimize emissions and reducing the environmental impact of any waste handling in line with requirements of a recognized international standard such as ISO 14001. Applicable legislation must be followed, and emissions to air and discharges to water must comply with regulatory requirements and existing permits. If hazardous waste is generated, procedures must be in place to ensure compliance with national regulations. Environmental impacts in the development of products and services should be considered.

Ethical Business Standards and Compliance

All our business partners, including suppliers, distributors, consultants, and independent contractors, are expected to adopt and comply with the ethical business standards and values set out in this code of conduct. They must actively communicate these standards when dealing with their own (sub-) suppliers.

Anti-Bribery and Corruption

Services – Consultants, Speakers, Key Opinion Leaders, Agents, and Other Service Partners

All Wellspect Business Partners providing a service to, or on behalf of Wellspect must comply with all applicable laws and regulations and policies applicable to Wellspect, regarding anti-corruption, anti-bribery, and ethical interactions with healthcare professionals as well as with government officials. The Dentsply Sirona Ethical Customer Interaction Policy, found here: [Ethical Customer Interaction Policy](#) defines how Wellspect and our business partners will interact with healthcare professionals and ensure compliance with all laws pertaining to these interactions including transfers of value and all transparency and reporting requirements.

Prohibition on Improper Payments and Gifts

To comply with the laws of the United States and the United Kingdom prohibiting bribery, as well as the laws of all other countries where we do business, Wellspect strictly prohibits improper payments, gifts, or any other transfer of value to any person, or promise or offer to do so, regardless of whether the person is a government official or private individual, for the purpose of obtaining or retaining business, or securing any other improper advantage. These actions are prohibited regardless of whether they are carried out by our employees, agents, representatives, or business partners.

Additionally, our business partners must not make any payment in cash or in-kind to any government official on Wellspect's behalf without approval from Wellspect's Legal Department. We expect all employees and all of our business partners to fully comply with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, as well as all local laws governing improper payments and bribes.

Wellspect Business Partners are expected to conduct their business with honesty, fairness, and integrity. Business partners, their employees, or their subcontractors may not engage in, or tolerate, any form of bribery or corruption. Business partners shall not pay, offer, or promise to pay anything of value to a government official or a healthcare professional for the purpose of obtaining or retaining business or to induce, encourage, or reward a decision. Such improper benefits may include cash, non-monetary gifts, monetary loans, pleasure trips, luxury goods, services, or amenities of any other nature.

Compliance with Anti-Corruption Laws

Suppliers and all persons acting on their behalf shall comply with all applicable anti-corruption laws while conducting business with Wellspect. Bribery and any other form of corrupt business practice are strictly prohibited. Suppliers must ensure that no such benefits are exchanged in the course of their business. Suppliers shall conduct appropriate risk-based due diligence prior to engaging any sub-supplier to ensure that such third parties comply with all applicable anti-corruption laws.

Ethical and Responsible Sourcing

Suppliers must have ethical and responsible sourcing practices in place and source only from companies that satisfy the requirements of this code of conduct. Suppliers must secure a due diligence framework to ensure that they have policies and processes in place to identify, prevent, mitigate, and account for adverse impacts in their own operations and related to their own (sub-)suppliers regarding human rights and environmental risks. This framework shall be governed by the supplier's senior management and be based on the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. Dentsply Sirona reserves the right to verify compliance with the supplier's human rights policy and due diligence framework to ensure it operates in line with the mentioned principles and guidance documents. Suppliers shall be aware of all sites and companies involved in their production and supply chain and, upon request, provide Wellspect with adequate details of the supply chain for the goods supplied. Suppliers must implement appropriate measures to ensure that their own suppliers comply with the requirements set forth in this code of conduct. This includes all legal and contractual requirements related to the production and delivery of raw materials, components, and services, including conformance with required specifications and similar requirements.

Import - Export Control

Wellspect seeks to comply with all applicable laws and regulations governing importing and exporting products and technology. This includes production materials, finished goods, capital equipment, molds and tooling, samples and prototypes, repaired and returned products, and technical information.

Business partners are expected to exercise due diligence to ensure proper import/export-related policies, procedures, and controls within their organization. This includes proper identification of third parties, their locations, and the source locations and countries of origin of the products supplied to us, including their components.

As a supplier, this includes responsible participation in Wellspect's Conflict Minerals program, which seeks to verify and eliminate the sourcing of gold, tantalum, tin, and tungsten from the Democratic Republic of the Congo and neighboring states, where profits aid in continued aggressions and human rights violations.

As a distributor, business partners must follow all laws and these policies when registering our products (where necessary) to make them available for sale. Products may only be sold into countries and territories authorized by the commercial agreement. Failure to comply could expose Wellspect, our customers, and other business partners to significant financial exposure, increased scrutiny from government agencies, harm to individuals, and negative publicity.

Our position as a good global corporate citizen and our ability to conduct business on a global basis are privileges that we guard carefully, and we will not allow anyone to jeopardize them.

Conflicts of Interest

We expect our employees and business partners to identify and prevent situations where there is a conflict of interest, or even the appearance of one. All Wellspect employees must disclose to their local Human Resource management if they are employed by any company other than Wellspect. If a conflict of interest is identified, the employee will be advised that continued employment at Wellspect requires the termination of the relationship with the other employer.

Our employees must not accept anything of value if it would constitute either an inducement to make, or a reward for making, any decision that is favorable to the interests of them or a third party, and not Wellspect. We expect our business partners to support this policy, to not put our employees in a situation where they may be compromised in their independence or judgment and therefore may be placing their own interests or those of any third party (including any business partner) above Wellspect's.

Antitrust and Competition Laws

Competition is part of business, and Wellspect competes by making superior products, selling them at fair prices, and providing value to our customers. While doing so, we expect our employees, agents, representatives, and supply chain partners to comply fully with all antitrust and competition laws that apply to our and their respective businesses, and to thereby compete fairly. This means not entering into an agreement with or among any competitor(s) that restrains trade or reduces competition – such as agreements to: fix, stabilize or control price; limit output levels or the sale of products; allocate customers or geographic territories; or boycott certain suppliers or customers.

Management system

Business Partners should have adequate management systems and controls in place to ensure compliance with the Wellspect BPCC or agreed equivalent standards. The functioning and quality of the Business Partner's management system should be in proportion to the size, complexity and risk environment of its business. Wellspect Business Partners are encouraged to have or work towards a culture of continuous improvement in developing and implementing measures to ensure they align with the requirements set forth in the Wellspect BPCC.

To this end, every Wellspect entity engaged in procurement of goods and services from third parties (external to Wellspect) must establish and maintain a program to assure compliance to laws and regulations set forth in the Wellspect BPCC. This program will have the following elements:

- A method for identifying those suppliers, including their suppliers, sub-suppliers, and any additional tiers of suppliers involved, which represent the greatest risk in terms of potential violations to the provisions of these laws and a structured action plan for those deemed as "high risk".

- A risk-based plan whereby those suppliers identified as high-risk are assessed at appropriate intervals for compliance to these laws.
- Purchasing Agreements, Supply Agreements, and/or Purchase Orders will contain language detailing Wellspect's expectations of our Supply Chain Partners related to Human Rights and all other ethical concerns outlined in this document. Further detail is provided in the Purchasing Agreements section of this document.
- Quick and appropriate actions if any supplier is found to be in non-compliance with our purchasing agreements/ purchase orders related to modern slavery, human trafficking or Conflict Minerals.
- Documented training of all employees engaged with our supply chain wherein they acknowledge reading, understanding, and commit to complying with the provisions of this policy.

Monitoring and Rights to Audit

Wellspect Business Partners' compliance to the Wellspect BPCC will continuously be monitored by asking Business Partners to provide relevant information as well as be entitled to perform audits at Business Partners' premises or sites regarding Business Partners' proper fulfilments of the Wellspect BPCC. In addition, suppliers shall ensure access for either Wellspect representative or an appointed third party to their own and their sub-suppliers' production facilities. In case of deviations from the Wellspect BPCC and/or applicable laws and regulations are found, the Business Partners shall take corrective actions in accordance with, and in cooperation with Wellspect, agree upon corrective action plans. Lack of cooperation, repeated or severe violations to the Wellspect BPCC and/or applicable laws or regulations may result in a reduction in business and, ultimately, end to the business relationship with Wellspect.

Formal Agreements

Commercial Agreements (Supply Agreements, Purchasing Agreements and/or Purchase Orders, Distributor Agreements) will contain Compliance and Ethics terms and conditions which requires support of all laws and regulations, the Dentsply Sirona Code Ethics and Business Conduct, the Wellspect BPCC and the DS BPCC.

Your Responsibility

As a business partner, your role does not end with simply understanding Wellspect's values and principles. If any ethical or legal compliance issues arise that raise questions in your mind, we expect you to bring them to our attention. If you raise a concern, you may choose to remain anonymous (though identifying yourself may aid in our investigation of the matter). Regardless, we will treat your concern as confidential to the full extent permitted by law.

To raise a concern, you can submit a report through our confidential Ethics & Compliance Hotline at dentsplysirona.ethicspoint.com. Reports can be made online or by phone using the toll-free numbers listed on the website. This service is available 24 hours a day, 7 days a week, and can be accessed from any location. For additional assistance, please feel free to contact a Wellspect Ethics & Compliance professional.

In addition, you may reach out to your primary business contact at Wellspect, or the Chief Compliance Officer, the General Counsel, or a member of the General Counsel's staff to report your concern, and you may

do so either by telephone or email. You can find the telephone numbers and email addresses of the Chief Compliance Officer as well as the General Counsel and staff on Wellspect's corporate website.

Signature section

The Business Partner acknowledges receipt of the Wellspect BPC and affirms compliance with the values and principles stated therein. By signing this document, the Business Partner also acknowledges receipt of and compliance with the DS BPC. The Business Partner further commits to operating its business in compliance with all applicable laws and regulations. This affirmation has been signed by a duly authorized officer with the authority to sign on behalf of the Business Partner.

Business Partner (Company name):

Date:

Signature:

Name:

Title: