

# Fighting Against Forced Labour and Child Labour in Supply Chains Act Report

Dentsply Canada Ltd ('Dentsply Sirona') has an unwavering commitment to supporting the global effort to combat modern slavery, child labour, human trafficking and all other human rights abuses.

This statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act and constitutes Dentsply Sirona's report and attestation for the 2023 financial year. It sets out the steps Dentsply Sirona have taken to ensure that slavery, child labour and human trafficking is not taking place in our supply chains or in any part of our operations.

Dentsply Canada Ltd and its subsidiaries will be collectively referred to as "Dentsply Sirona", "we", "us" or "our" within this statement.

## **Dentsply Sirona's organization structure and supply chains**

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.

Dentsply Canada Ltd, locally headquartered at 60 Courtneypark Dr W, Unit 1, Mississauga, Ontario, L5W 0B3, is a wholly owned subsidiary of Dentsply Sirona Inc. Dentsply Canada Ltd employs 167 staff based in Canada.

The Canadian Business Number for Dentsply Sirona Pty Limited is: 101348 779.

Dentsply Canada Ltd's main operations in Canada are the distribution, marketing and sales of Dentsply Sirona products to our customers directly and via distribution. Dentsply Sirona products are manufactured at our various manufacturing sites around the world.

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.

# OUR COMPANY



The majority of Dentsply Canada Ltd's supplier relationships are with other entities within our group and thus, are considered very stable and long-lasting.

Dentsply Canada Ltd's local supply chain includes the transportation of Dentsply Sirona products from our global manufacturing sites to our local warehouses and then on to our end customers. It also includes services that are required for daily operation such as cleaning, freight forwarding and office suppliers. As well as external professional services when needs arise.

The three largest suppliers to Dentsply Canada Ltd by volume are all Dentsply Sirona subsidiaries. The top being our Lancaster Distribution Center, followed by our distribution centre in Venlo, the Netherlands and Sirona Dental, our manufacturing site in Bensheim, Germany. The highest volume suppliers supplying Dentsply Canada Ltd from our Lancaster Distribution Center are Preventive (DPD), Restoratives (Milford) and Lab (Trubyte) products.

Our SureSmile product line orders are made by dental professionals and delivered directly to them from Dentsply Sirona in the US.

## 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 DS. 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.

## Vision

We transform dentistry to improve oral health globally.

## Purpose & Mission

Every day, we empower millions of customers by proudly creating innovative solutions for healthy smiles

## 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 31/12/2023, Dentsply Sirona has a global workforce of approximately 15,198 employees based in 49 locations worldwide, including 167 based in Canada, and a sales presence in more than 120 countries.

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 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.

SEGMENTS	TECHNOLOGIES & EQUIPMENT					CONSUMABLES			
	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES	PRODUCT CATEGORIES
	Digital Solutions	Enabling Devices	Orthodontics	Implants	Healthcare	Single Unit Crowns (Indirect)	Root Canal Treatment	Digital Lab Workflow & Preventive Procedures	Class II (Direct)
WELL ESTABLISHED BRANDS	Axeos Orthophos Sidexis 4 Schick Primescan CEREC® Primermill Omniscan inLab®	Intego Sinus Teneo SiroLaser DAC T1 Midwest® T2 Midwest® T3 Midwest® T4 Midwest®	SureSmile®  <b>byte</b>	Astra Tech Implant System® Atlantis® Simplant® PrimeTaper OSSIX mis	Wellspect®  LoFric®  Navina®	Aquasil Ultra+ Smart Inlay Impression Material CEREC tessera CEREC Zirconia+ Calibra Cements	ProTaper Ultimate WaveOne® Gold AH Plus® VDW®	Cavitron® Cavitron® Slimline® Nupro® Portrait iPN Denture Teeth Cercon Zirconia Lucitone Print	Palodent® Plus Sectional Matrix System Palodent 360 TPH Spectra ST Universal Composites Innovation SmartLife Pro Surefil one

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

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 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 3464 direct suppliers globally, with 78% of spending focused on the top 250 direct suppliers (54% 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.

### **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. As communicated in our internally and externally facing Codes of Ethics and Business Conduct, we expect all our employees and business partners, including suppliers, to fully comply with the California Transparency in Supply Chain Act of 2010, the UK Modern Slavery Act of 2015, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 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 global policies which all staff are trained on at onboarding and annually throughout each employee's tenure at Dentsply Sirona.

[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 are able to 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 attest to compliance with our Business Partner Code of Conduct. We look at compliance with all applicable laws worldwide 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 or Terms & Conditions which includes language precluding engagement in corruption and bribery and will adhere to all US trade sanctions as well as laws and regulations pertaining to human rights and anti-human trafficking.

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 Code of Ethics and Business Conduct, potential breaches of country or international law or an incident of unethical behaviour or business practices. Management is encouraged to make themselves available for such talks 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 office presence and is available in all languages we do business in. 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 reviewed and sent on to the appropriate member of the Ethics & Compliance team to manage and action. If it is determined that an investigation is required, resources will be allocated as necessary.

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. This agreement defines 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.

All suppliers must attest to the contents of our Third-Party Supplier Conduct Agreement prior to commencing business, this attestation can be made either by signing the Third-Party Supplier Conduct Agreement as a standalone document, as part of a wider contract or by including in our Terms & Conditions. By attesting to this compliance agreement, our suppliers are self-certifying that they will comply with all relevant local and international laws, the provisions of the Dentsply Sirona Business Code of Conduct and Ethics as well as our Business Partner Code of Conduct and will cooperate with requests related to compliance with Human Trafficking and Modern Slavery laws including on-site audits if requested.

### **Training**

As part of our commitment to ensuring the integrity and ethics of our operations, Dentsply Sirona takes responsibility for the conduct of its employees worldwide, recognizing each individual as a representative of our company values. To this end, we ensure that all our staff across all global entities are assigned training on our Code of Ethics and Business Conduct as part of the onboarding process, with refresher courses taking place annually.



In training our employees, we utilise different methods, such as global communications, digital learning modules and on-site presentations. Training is orchestrated by our Ethics and Compliance Department to ensure a consistent and comprehensive approach.

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 due diligence procedures.

These measures, we believe, equip our staff with the knowledge and tools needed to identify and address potential risks of modern slavery in our business and supply chains.

### **Assessing Modern Slavery Risk**

In our assessment of potential modern slavery risks within our operations, we have adopted a thorough and collaborative approach. We have sought the expertise of external partners and enlisted the guidance of proficient legal counsel to strengthen our evaluation. Additionally, we have facilitated enriching dialogues with our industry peers to learn from their experiences and strategies. Part of our risk assessment process also involves consulting

authoritative external sources. These include the collaborative global partnership Alliance 8.7, the UK's Annual Modern Slavery Report, and the US Department of Labor's List of Products Produced by Forced or Indentured Child Labor. These diverse channels of information allow us to gain a holistic understanding of the issue, enhancing our ability to proactively address and eliminate modern slavery, child labour and human trafficking in our operations.

Dentsply Sirona's largest exposure to modern slavery risks is through our use of third parties, particularly in the service industry. As a result, when engaging with service providers in the cleaning, catering and transportation industries, through our due diligence process, we aim to use reputable providers with no history of any negative human rights or ethical issues.

In response to the findings of our modern slavery risk assessments, we have structured our supply chains to minimize engagements with suppliers from countries where modern slavery has been known to be an issue.

We have taken steps to eliminate business interactions with suppliers based in countries that relevant international organizations have labelled as having a high risk of modern slavery in order to minimise the potential risk. To that end, Dentsply Sirona does not have any suppliers based in North Korea, Eritrea, Libya, Iran, Equatorial Guinea, Burundi, Democratic Republic of the Congo, Congo, Somalia, Central African Republic, Afghanistan or South Sudan, underscoring our commitment to a supply chain free of modern slavery.


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 Australia, the Netherlands, Sweden, the UK, and the US. Demonstrating our proactive stance, over 40% of our direct suppliers are based in these five countries alone, which further underscores our commitment to ethical sourcing and the global fight against modern slavery.

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.

Other high-risk areas we have identified within our supply chain and have focused our efforts on are freight, raw materials, IT, and telecommunications to ensure ethical sourcing and procurement practices.

69% of our freight spending is directed towards suppliers based in Australia, Germany, the UK, and the US.

70% of our spending in this category is allocated to suppliers located in Germany, Sweden, Switzerland, and the US.



90% of our raw materials spending goes to suppliers based in Belgium, Germany, Sweden, Switzerland, and the US.

By concentrating our spending in these regions, we leverage their strong histories of combating modern slavery, thereby reinforcing our commitment to ethical business practices.

### **Due diligence processes**

Our initiatives to mitigate the risk of human rights abuses within our supply chain constitute one aspect of our broader goal to exclusively engage with third-parties of high ethical. In order to realize this objective, we have established a strong due diligence process. This process is designed to scrutinize prospective suppliers, enabling Dentsply Sirona to only engage with business partners who meet and adhere to the high business and ethical standards we demand.

#### **Workflow A**

Prior to any formal engagement, potential suppliers go through an internal process whereby the on-boarder completes a questionnaire where they are required to enter various items of information about the supplier including (but not limited to) name, country, industry and volume of purchase. A risk flag system will then indicate if the potential supplier is considered 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 mineral 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.

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.

A further risk analysis was conducted in 2023 to identify, evaluate, and prioritise human rights and environmental risks in our supply chain.

To ensure the objectivity, accuracy, and robustness of our due diligence processes, an independent third party was contracted to perform both abstract and concrete risk assessments of selected suppliers. 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.

Dentsply Sirona remains committed to compliance with applicable sanctions laws and regulations and to working with our suppliers to mitigate the risk of sourcing products that involve forced labour or child labour.

## **Measuring effectiveness**

As all of our due diligence reports and third-party onboarding information is created and stored online and monitored daily against a wide selection of restrictions lists, we are alerted, via email, to any new issues found that are linked to one of our potential third-party partners or current suppliers. Once the Ethics and Compliance team is informed of a new alert related to a supplier, they will work to remediate this issue as a matter of priority. We also receive regular reports from our due diligence provider highlighting any new alerts received for the previous month to ensure nothing is missed.

At Dentsply Sirona we are committed to being a pillar of Ethics and Compliance in the dental and medical device industry and are constantly aiming to improve our programs and processes. Over the past year, we have made numerous changes to streamline our due diligence procedures. We will continue to work towards increasing staff and business partner awareness of Dentsply Sirona's commitment to preventing human rights abuses within our supply chain.

At Dentsply Sirona we are committed to continuous improvement and in 2024 we plan to review and update our procurement onboarding processes. We also plan to update our whistleblower hotline system and associated




policies. We aim to increase communications to all staff on a variety of Ethics & Compliance issues including human rights.

External counsel, in conjunction with the Ethics and Compliance team at Dentsply Sirona have reviewed our program from a risk-based perspective to assure we focus on the critical risk areas to maximize the program's effectiveness. We are committed to continuous improvement and will be strengthening our supplier contracts and self-certifications as well as building upon our current policies and processes.

## Attestation

### Dentsply Canada Ltd

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 entity or 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.

- Full name: Melanie Lecours
- Title: VP, North America Commercial Surgical Regional Business Leader
- Date: 30/05/2024
- Signature: 

I have the authority to bind Dentsply Canada Ltd