

# Colosseum Dental Group **Supplier Code of Conduct**

Version 1.0/November 2018

## Introduction and Scope

As one of the leading dental care providers in Europe, it is our aim to provide high-quality dental services to help our patients improve their quality of life. To be able to deliver such high-quality dental services, we are not only dependent upon our employees but also upon our suppliers. We carefully choose the latter and work only with reliable, trusted and reputable suppliers that share the same values as us. We expect our suppliers to fundamentally commit to a fair, sustainable, high-quality and compliant way of doing business.

This Supplier Code of Conduct applies to all our suppliers, their employees as well as any sub-contractor assisting the supplier in providing products and services to the Colosseum Dental Group. We expect our suppliers to adhere to the principles and commitments outlined in this Supplier Code of Conduct and to live by the values defined herein.

### 1. Commitment to Compliance

Our suppliers are committed to complying with all laws and regulations applicable to their area of business and the products and services that they provide to the Colosseum Dental Group shall conform to all applicable requirements. We expect our suppliers to have a program in place to ensure and monitor compliance with the applicable laws and regulations as well as this Supplier Code of Conduct.

### 2. Commitment to Quality

Most of the products that we source from our suppliers will be used on patients. Consequently, our suppliers are committed to providing high-quality, safe and sustainable products and services that meet the quality requirements and specifications foreseen by applicable laws and/or as agreed with the Colosseum Dental Group. Our suppliers are expected to have the necessary quality control processes in place to ensure that the products and services are safe for their intended use.

### 3. Commitment to Anti-Corruption

Ethical business behavior is a core value for the Colosseum Dental Group and we therefore expect our suppliers to commit to abstaining from any corruption and bribery in their business practice. Our suppliers shall not engage in or tolerate any form of bribery or other unlawful practice in order to unduly influence any relevant decision makers. Suppliers shall make sure that their employees, agents and sub-contractors do not offer or grant any inappropriate personal benefit to any employee of the Colosseum Dental Group in connection with our group's procurement of products and services. We expect our suppliers to take the necessary organizational steps to prevent bribery and corruption and monitor ongoing compliance with all applicable anti-corruption laws.

## 4. Commitment to Fair Competition

We expect our suppliers to commit to conducting their business in compliance with applicable competition and antitrust laws. Our suppliers shall not engage in business practices that negatively affect fair competition or free markets, such as price fixing, market sharing or market splitting.

## 5. Commitment to Confidentiality & Privacy

Protecting our confidential information as well as the privacy of our employees and patients is very important to the Colosseum Dental Group and we also expect this from our suppliers. Our suppliers are therefore committed to respecting the Colosseum Dental Group's confidential business information as well as the privacy of our employees and patients. They may not share such confidential information with any third party without having obtained our prior consent. Nor may a supplier use such confidential information for any other purpose than for providing products or services to the Colosseum Dental Group under the relevant contractual framework.

Suppliers shall always process personal data from our employees and/or patients in accordance with the applicable data protection laws. In particular, suppliers shall not process such personal data for their own purposes nor disclose such personal data to any sub-processor without having obtained our prior consent. Our suppliers shall implement appropriate technical and organizational measures to protect such personal data from unauthorized access, use and processing.

## 6. Commitment to Fair Treatment

Our suppliers are committed to creating a working environment that provides a safe and healthy work place with fair employment conditions that is free from discrimination and respects human rights. They comply with applicable international labor and human rights standards as defined by non-governmental organizations such as the International Labor Organization or the United Nations. In particular, our suppliers shall abstain from any form of forced or child labor and ensure that no form of modern slavery takes place in their supply chain.

## 7. Commitment to Sustainability

Our suppliers are committed to doing business in a sustainable and environmentally responsible way, having all necessary environmental permits to manufacture the products and respecting all applicable legal environmental requirements. We expect our suppliers to use natural resources efficiently and have processes in place to ensure sustainable waste management and recycling.

## 8. Inspection

In order to demonstrate compliance with this Supplier Code of Conduct, our suppliers shall retain the necessary documentation and provide a copy thereof to the Colosseum Dental Group upon request. The Colosseum Dental Group shall also have the right to inspect our suppliers' facilities for compliance with this Supplier Code of Conduct. Should such an inspection lead to any findings of

non-compliance, the supplier shall propose corrective and preventive actions to the Colosseum Dental Group and, upon approval by us, implement such actions immediately. Repeated breaches may lead to the termination of our business relationship as well as the exclusion from future requests for proposals.