

Honesty and integrity.
We stand by our word.

NDX CODE OF CONDUCT





Our Mission and Values

We strive to be the preferred dental lab for all restorative services by continually delivering on value, quality, innovation and exceptional experience.



NDX C.O.R.E. Values

With an established reputation for integrity, at National Dentex (NDX) we are known for standing by our word. Honesty and integrity are characterized by truthfulness and a lack of deception or fraud. These qualities are unchanging and absolute and dictate one standard of conduct. If we are steadfast in this belief, questions of ethical behavior are easily answered in most situations.

No “code of conduct” can hope to spell out the appropriate moral conduct and ethical behavior around every situation with which we may be confronted. In the end, we must rely on our own good judgment. Whenever we find ourselves with a hard decision to make, we must seek counsel, either from local management, corporate management, or, most importantly, from our own conscience.

One of our most important principles of our policy is openness. Every transaction that we engage in must be correctly recorded and create no fear of inspection.

These are the overriding principles that must guide us in conducting our business and are expected to be met by every employee. This document is merely a guideline. What ultimately counts is how we follow through at each and every level of our company.

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- C** Collaboration
 - O** Ownership
 - R** Right Behaviors
 - E** Empowerment

- Collaboration based on mutual respect and open two-way communication
- Ownership through individual accountability
- Exhibiting the “Right” Behaviors rooted in complete honesty and trustworthy behavior
- Empowerment leading to total commitment to one another and NDX



We Will Make Ethical Decisions

This Code applies to all NDXers no matter what job you hold. Whether you work at our labs across the globe or at our headquarters, you will be held accountable for understanding and following the Code, NDX policies and procures and the laws that apply to our business.

The Code is designed as a guide to help you in making decisions. If you have a question about a matter or are unsure about a decision, ask yourself each of the following questions and follow the guidance.

X

Is it legal?

No. Do not proceed.

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Is it in compliance with NDX policy?

Not sure. Ask your manager for clarification or use one of our Reporting Resources.

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Does it feel like the right thing to do?

Yes. If the answer to each of these questions is “Yes”, then you can proceed.

X

Could this endanger someone or cause injury?

Yes. Do not proceed.

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Would you feel comfortable if your action was in the media?

Not sure. Ask your manager, human resources or the compliance department for clarification or use one of our Reporting Resources.



Reporting Resources

If you see or suspect any activity that violates our Code, policies or laws, you have a responsibility to promptly report in good faith using one of the reporting options. We provide a number of ways to voice concerns and receive assistance:

Talk

Talk to your Manager, Human Resources Partner, Compliance or Legal Department



Visit

nationaldentex.ethicspoint.com
nationaldentexmobile.ethicspoint.com



Email

compliance@nationaldentex.com



Call

US and Canada Hotline: 1-844-995-4902
Vietnam Hotline: 1800 4917



Additional Information

There are times when you may need to seek guidance on what action to take, as the Code is unable to include every topic. Your compliance and human resources partners are here to help you make the right ethical decisions. Please contact your partners or use the compliance@nationaldentex.com email for additional information.

NDX does not tolerate retaliation of anyone, who in good faith, asks a question, speaks up about possible misconduct or participates in an audit or investigation. Any retaliation can lead to disciplinary action up to and including termination of employment.





Our Employees in the Workplace

At NDX, we are committed to acting with integrity, treating one another with respect and providing a safe, healthy, sustainable and responsible workplace.

- We are committed to maintaining a safe and healthy workplace.
- We are committed to maintaining a workplace free of harassment and discrimination.
- We are committed to achieving a diverse and inclusive workplace.





Maintaining A Safe And Healthy Workplace

NDX's Commitment:

We are committed to maintaining a safe and secure work environment for our NDXers and business partners. We will follow all applicable labor, workplace, health and safety regulations and laws.

Why It Matters:

It is the right thing to do. It promotes a positive, caring work environment where people can thrive and enjoy their jobs and interactions with their co-workers. We make health and safety a daily priority by observing the health and safety rules of our job. All of us must take precautions to protect ourselves, our colleagues and our visitors.

We must also observe environmental laws to ensure we do not harm ourselves or our environment where we live and work.

To perform at our best every day, we report to work free from any substances, including alcohol or drugs that could prevent us from doing our jobs or create a dangerous situation.

Acts of violence, threats and physical intimidation will not be tolerated at NDX. Such actions can result in immediate disciplinary action including termination.



Maintaining A Safe And Healthy Workplace

In Your Daily Work:

- This requires each team member to be an advocate of safety at all times and to follow all laws, safety procedures and applicable regulations (such as OSHA). When you stay alert and follow our safety procedures, you are better able to protect yourself and your coworkers.
- Recognize your responsibility to help maintain a safe and healthy workplace and take action if an unsafe situation arises.
- Know and keep apprised of safety regulations and stay alert to your surroundings.
- Report unhealthy or unsafe conditions or behaviors. This includes workplace hazards, broken equipment, injuries or threats of violence.
- Know what to do in case of an emergency.
- Never bring illegal drugs or other controlled substances onto company property or be under the influence while at work.
- Use good judgment and exercise moderation when alcohol is served at company events. Transportation can always be provided if needed.
- Do not carry firearms or other weapons onto company premises or while traveling on company business except as permitted by applicable laws.
- Never retaliate against anyone who reports a health or safety concern.
- Follow applicable wage and hour laws.



Prohibiting Harassment And Discrimination

NDX's Commitment:

NDX maintains a work environment based on dignity and respect and free from harassment and discrimination.

Why It Matters:

We believe every employee should be treated with respect regardless of their race, color, national origin, ethnicity, religion, age, disability, medical condition, veteran status, marital status, gender, sexual orientation, gender identity or gender expression or other protected characteristic.

Many forms of harassment and discrimination are prohibited by law. Behavior that interferes with another's work environment is prohibited. This includes offensive, intimidating, disruptive, abusive or hostile words or actions.

NDX has zero tolerance for unwanted verbal or physical (sexual or otherwise) conduct. This includes degrading and disparaging jokes related to any protected category. All claims will be seriously investigated and may result in immediate disciplinary action including termination.



Prohibiting Harassment And Discrimination

In Your Daily Work:

- Maintain a workplace where individuals are free from all forms of harassment, including bullying.
- Conduct yourself appropriately in all dealings with others.
- Be aware and recognize signs of harassment. When behavior interferes with someone's work or creates a hostile or offensive environment, it may be harassment. Harassment may take a variety of forms and can be visual, verbal, physical or sexual in nature.
- Stay alert for sexual harassment. This can include asking someone out repeatedly, sexual advances, inappropriate touching, sharing of sexual materials, inappropriate verbal or physical conduct.
- Do not discriminate against anyone on the basis of race, color, gender, age, national origin, religion, sexual orientation, gender identity, disability or any other legally protected characteristic.
- Promote equal employment opportunities.
- Be conscientious of how our actions and comments might be perceived or misunderstood by others.
- Report any instances of discrimination or harassment immediately.



Examples of Harassment:

- Unwelcome sexual advances or remarks
- Disparaging comments, slurs, gestures or jokes
- Displaying or storing written or graphic matter that shows hostility toward a group or individual
- Distributing or storing pornographic, obscene or sexually suggestive content



Achieving A Diverse And Inclusive Workplace

NDX's Commitment:

We believe in our people. We encourage a diverse and inclusive environment that gives everyone access to the same opportunities and where everyone feels welcome, valued and respected.

Why It Matters:

Every one of our employees is guaranteed the same equitable treatment. We value individuals of diverse backgrounds, approaches and ideas. When we are inclusive and do our best to create opportunities for everyone, we benefit from the richness of different perspectives and points of view.

In Your Daily Work:

- Treat your team members with dignity and respect.
- Foster an atmosphere of open and candid communication where all perspectives are welcome.
- Speak up when you observe actions and behaviors that are not consistent with our values.



Ensuring Trust

At NDX, we recognize the impact of our products on our customers' patients. The everyday choices we make matter to those we work with and our customers.

- We will keep quality at the forefront of our daily activities
- We will ensure a compliant global business
- We will protect human rights and prioritize responsible sourcing
- We will keep privacy in mind
- We will avoid conflicts of interest
- We will compete fairly





Ensuring Quality Products and Services

NDX's Commitment:

We will ensure our customers receive high quality products and services they can trust. Our reputation is based on our customers' and their patients' experiences with our products and services.

Why It Matters:

Our products and services affect hundreds of patients daily. Our reputation is based on every product we make and every service we provide. We aim to meet or exceed our customers' expectations on a daily basis. To ensure this, we must produce quality products and provide services while strictly adhering to our quality program.

In Your Daily Work:

- Always strictly adhere to the requirements of the NDX quality program.
- Continuously learn and train.
- Never take shortcuts or bypass quality controls.
- Immediately report any quality issues so that prompt action can be taken.



Maintaining A Compliant Global Business

NDX's Commitment:

As a company with a global supply chain, we are committed to acting ethically and complying with applicable laws and regulations that govern international trade. We neither rely upon nor tolerate unethical or illegal business practices. We require the same standards from our business partners.

PREVENT BRIBERY: We comply with all anti-bribery laws and never offer or accept any form of payment or incentive intended to improperly influence a business decision. In addition, we keep accurate books and records and maintain effective financial controls.

FOLLOW INTERNATIONAL TRADE RULES: We follow all international trade rules including U.S. sanctions and import or export regulations. International trade rules regulate where, how and with whom we can conduct business across borders. We do not conduct business with countries or entities that are subject to trade embargoes or economic sanctions, and we do not participate in boycotts that the U.S. government doesn't support.



Maintaining A Compliant Global Business

Why It Matters:

Being a responsible corporate citizen is a top priority for NDX. This includes abiding by the laws and regulations that may govern our activities including applicable anti-bribery, anti-corruption, sanctions and import/export laws. NDX prohibits all forms of corruption. Penalties for violations can be severe, including fines, revocation of license or permits and even imprisonment.

In Your Daily Work:

- Be familiar and comply with all applicable laws and company policies regarding international trade restrictions.
- Be familiar with bribery laws in applicable jurisdictions applying to NDX, including the U.S. Foreign Corrupt Practices Act (FCPA).
- Specifically, review NDX's Anti-Corruption Policy and its Trade Policies.

- If your work involves our global operations, you must take all related training and understand the company's obligations.
- Remember that third party business partners in the supply chain represent us, and if they violate the law, NDX may be held directly responsible. Monitor third party transactions closely.
- Ask for guidance if there is something that is unclear.
- Watch for any red flags and be extra cautious with transactions involving government officials.
- Immediately notify the Legal or Compliance department if you have any concerns.

POLICIES:

- Anti-Corruption
- Trade Policy
- Supplier Code of Conduct

WHAT CAN BE A BRIBE?

- Cash, a gift card or merchandise
- A meal, gift or entertainment
- Free travel
- A charitable or political contribution
- An offer of employment or an internship



Keep Privacy in Mind

NDX's Commitment:

As part of our day-to-day operations, we come into contact with the personal information of our team members, customers, their patients and business partners. We understand the critical obligation we have to collect, use and share this information in an appropriate way and follow the laws that prevent improper disclosure or use.

Why It Matters:

We expect you to protect the privacy of our team members, customers, their patients and business partners and take precautions to keep all personal information safe. Follow all applicable data privacy laws and our NDX policies for collecting, storing, using, sharing and disposing of personal information.

In Your Daily Work:

- Be able to recognize personal information that alone or with a combination with other data, can identify an individual, and handle such information accordingly and with care.
- Use personal information only for legitimate business purposes.
- Share personal information only with others authorized to see it and who have a business need to know it.
- Share personal information externally only if you have the appropriate permissions.
- Collect and share the minimum amount of personal information necessary for your project.
- Use a team member's personal information only for employment-related purposes, unless you have consent for other purposes.
- Destroy personal information when no longer needed or remove details that could identify someone.



Avoiding Conflicts of Interest

NDX's Commitment:

At NDX, we succeed together. We never allow our personal interests to impact the business decisions we make as team members. The term “conflict of interest” describes any circumstance that could cast doubt on our ability to act with total objectivity with regard to the company’s interests. When our outside activities conflict or even appear to conflict with our responsibilities as an NDXer, we should avoid and disclose any activity that could be considered a conflict of interest.

Why It Matters:

Conflicts of interest can negatively affect not just NDX but its team members. The best way to avoid a conflict of interest is to know and avoid the types of situations where conflicts typically arise between personal and business interests and relationships. Because we value professional objectivity in our relationships with others, we discourage the acceptance by an NDX team member or any member of his/her immediate family of personal

gifts and gratuities of value, including loans made by an NDX supplier, customer or anyone else in a business relationship. However well intentioned the giver, gifts in a business setting influence the climate of objectivity and thus serve to undermine impartial professional judgment.



Avoiding Conflicts of Interest

In Your Daily Work:

- You should not have any financial interest in a competitor, supplier or any other business that could cause split loyalty or even the appearance of such.
- Be alert to activities of family members. Always disclose any personal or family relationships or activities that have the potential to influence decisions you make on the job.
- If your responsibilities include working directly with information about a competitor, supplier or other organization, you must be free of any material financial interest in that organization.
- Know when to say “no.” Offers of gifts, entertainment or accommodations that do not further a legitimate business purpose or comply with NDX policies can create a conflict of interest. Know what is allowed and turn down anything that is or could be perceived as a violation of our policy.
- You cannot solicit or perform work in competition with NDX. If you intend to perform outside work, you must first notify and obtain written approval from the Compliance Department at compliance@nationaldentex.com.
- Outside work cannot be performed on NDX time. You cannot use the company’s equipment, materials, resources or inside confidential information for outside work. Nor should you solicit business or clients, or perform outside work on the company’s premises.
- If there is any doubt or question about the propriety of any relationship with any outside organization or activity, we expect you to discuss it with the Compliance Department.
- If there is or there could be a conflict, report the situation you are involved in and remove yourself from the decision process.

Conflict of Interest Quick Test

IF I TAKE THIS ACTION:

- Will I feel obligated to someone else?
- Is it in conflict with the NDX code or policies?
- Is there a chance my independent judgment is compromised?
- Could it give the appearance of impropriety or divided loyalty?



Competing Fairly

NDX's Commitment:

Acting ethically is core to our culture. Competition and antitrust laws promote free and fair competition between companies. By complying with these laws, we contribute to a thriving marketplace and compete for business based on the quality of our products and services.

Why It Matters:

NDX acts with integrity and fair dealing in our daily activities. Each team member is responsible for following the applicable antitrust and competition laws and ensuring that when doing business with others to avoid practices that are unfair, manipulative or deceptive.

In Your Daily Work:

- Do not make agreements with competitors or others that restrain competition – follow antitrust laws.
- Never discuss or reach an agreement with a competitor on price, terms of sale, margins, promotions, business partner

relationships or the division or allocation of markets or territories.

- Avoid even the appearance that our decisions are based on shared information with a competitor.
- If you gather competitor information, use honest methods. Never encourage anyone to give you information that should be kept confidential, and always refuse information you suspect was improperly obtained. It is never OK to share confidential information from a previous employer.



Safeguarding What's Ours

At NDX, our reputation is in our control and our sponsors have put their trust in us to deliver sustainable performance and create long-term value.

- We will secure our assets
- We will maintain confidential information and intellectual property
- We will use company systems responsibly and will prioritize cyber-security
- We will manage our records





Secure Our Assets

NDX's Commitment:

NDX resources are provided to help us manage our business effectively while serving our customers and their patients. If we use these resources inappropriately, we inadvertently risk financial loss, reputation damage and our ability to grow and thrive.

Why It Matters:

Each of us is expected to care for NDX's assets and use them responsibly, along with any assets or information belonging to our customers and business partners. You are responsible for the resources provided to you and for taking care in your use of such resources to prevent any loss, damage, theft, fraud, misuse, waste or unauthorized disclosure.

In Your Daily Work:

- Recognize company assets that can take different forms from lab equipment to computers to materials.
- Follow the appropriate security procedures to secure any assets.
- If you see something, say something.



Protecting Confidential Information and Intellectual Property

NDX's Commitment:

We must safeguard NDX's and third party confidential information against unauthorized disclosure and misuse. Confidential information, including intellectual property, are valuable assets of NDX and our business partners.

Why It Matters:

Our company's confidential information is vitally important to helping us develop new products and markets, attracting customers and maintaining our competitive advantage. In addition, our customers and third parties entrust us with their confidential information in the course of business.

In Your Daily Work:

- Limit access to confidential information to those whose jobs require it.
- Do not talk about confidential information in public areas. These include planes, elevators and restaurants, whether talking in person or on mobile phones.

- Never use confidential information for personal gain or to benefit anyone outside of NDX.
- Remember that the obligation to protect all confidential information continues after leaving NDX.
- You must not use confidential information you learn during your employment for personal gain or in violation of law. For example, trading in securities or investing in another company where you had access to the confidential information of the company or transaction.



Protecting Confidential Information and Intellectual Property

What is Confidential Information?

EXAMPLES INCLUDE:

- Information that NDX owns such as proprietary information about its products
- Information NDX receives from third parties that is deemed confidential
- Trademarks, patents or other intellectual property
- Financial information
- Manufacturing information
- Procurement data
- Workforce data
- Legal opinions and work product



PROPRIETARY
INFORMATION



RECEIVED
CONFIDENTIAL
INFORMATION



TRADEMARKS
& PATENTS



FINANCIAL
INFORMATION



MANUFACTURING
INFORMATION



PROCUREMENT
DATA



WORKPLACE
DATA



LEGAL
OPINIONS



Use of Company Systems and Cyber Security

NDX's Commitment:

We must all be responsible in our use of the company's information and systems and guard against cyber threats. By using the cyber-security controls, measures and training established by NDX, we protect data on our systems from accidental or unauthorized disclosure, misuse, improper alteration or destruction.

Why It Matters:

NDX's information and computer systems are key to our operations and contain valuable data about NDX, our customers and business partners. It is critical that these assets are used responsibly and in compliance with NDX policies. We strictly prohibit the use of NDX systems for activities that are unlawful, unethical or otherwise contrary to this Code or company policy. In addition, today's cyber security protocols are essential for protecting the data we are entrusted with.

In Your Daily Work:

- Follow NDX policies and requirements related to computer and mobile phone use.
- Use company email for business purposes only.
- Strictly follow NDX cyber security practices and complete training.
- Recognize that there is no reasonable expectation of privacy when using company-provided services or equipment.
- Contact IT immediately if you believe there is or maybe a security issue.



Managing Our Records

NDX's Commitment:

In discharging their responsibilities, almost every team member reports data of some kind. A technician filling out a work ticket, a receiving clerk recording an order, a manager approving a material requisition or any team member filling out an expense report, are all reporting information. Team members are expected to do it accurately and honestly.

Why It Matters:

Some forms of inaccurate reporting may be illegal. Listing a fictitious expense on an expense report or petty cash slip, for example, is illegal. You should only list on your expense report everything you paid for that NDX is required to reimburse, nothing more or less.

In Your Daily Work:

- Report Information accurately. Whether it be sales results, production efficiencies, or hours worked, this should be accurate and timely and a fair representation of the true facts.
- Report information honestly. Information should not be presented in any way that is intended to mislead or misinform the user of the information.
- Know what is required by NDX policies and laws. Follow the record retention policy.



Caring for our World

At NDX, we recognize the need to be aware of our place in the world.

- We will protect human rights and prioritize responsible sourcing
- We will care for those in need
- We will invest in our communities



Protecting Human Rights And Responsible Sourcing

NDX's Commitment:

We will only do business with partners who uphold human rights and operate fairly and ethically while obeying the law. We are committed to maintaining an ethical supply chain free of forced labor, including slavery and human trafficking.

Why It Matters:

We expect our business partners to act ethically and protect the rights of all workers. Further, we are committed to responsible and sustainable sourcing and expect the same commitment from our business partners. Doing the right thing means being vigilant and setting the right example in our business dealings with other companies in our supply chain.

In Your Daily Work:

- If you deal with suppliers, ensure their business complies with our NDX Supplier Code of Conduct.
- Report any concerns immediately.



Caring for those in need

NDX's Commitment:

We will continue to support organizations and efforts to supply dental care and products to those in need.

Why It Matters:

NDX has a long history of supporting charitable organizations in the dental industry for those in need.

In Your Daily Work:

- All contributions must be approved, but we welcome new ideas.



Investing in our communities

NDX's Commitment:

We continue to support our communities where our team members live and work.

Why It Matters:

No matter what job you hold or where you live, we all have a responsibility to support and maintain our reputations and act responsibly in our communities.

In Your Daily Work:

- All charitable contributions must be pre-approved.
- We encourage our team members to become involved in our communities, however please do not make donations or speak on behalf of NDX without preapproval.



Contact Us

compliance@nationaldentex.com



For Resources

Visit the Human Resources or
Compliance Departments
SharePoint Websites



National Dentex ■ NationalDentex.com

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