

Committed to the  
Highest Ethical and  
Quality Standards

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**SUPPLIER  
CODE OF CONDUCT**





## A LETTER TO OUR SUPPLIERS

# Dear Business Partners,

National Dentex's Supplier Code of Conduct is designed to help us meet the highest ethical and quality standards possible. This Code establishes controls for all business conducted in our supply chain to ensure compliance with all applicable laws and that business is carried out in a socially responsible manner. It is the responsibility of our suppliers to implement management systems that facilitate compliance with this Code and the law, mitigate related operational risks and facilitate continuous improvement.

Thank you for your support as a critical supplier in the National Dentex network.

*Jeff Johnson*

VICE PRESIDENT, SUPPLY CHAIN



# Supplier Code of Conduct

## What It Is:



We believe a strong relationship with our suppliers is the key to ensuring National Dentex's ("NDX") success. The NDX Supplier Code of Conduct ("Code") was created to communicate our expectations to our suppliers.

## Why It Matters:



The Code is the foundation of our relationship with our suppliers - creating a mutual understanding of our company's core values and beliefs. The purpose of the Code is to outline our expectations according to law and our company's core values and beliefs - ensuring consistent compliance from all of our suppliers.



## 1 | **Human Rights Commitment**

Our Code is rooted in a deep commitment to human rights. We expect all Suppliers to commit to human rights and honor this highest standard when applicable laws and regulations differ.

## 2 | **Risk Assessment and Management**

We expect our suppliers to develop and maintain processes that identify risks in all areas addressed in this Code; assess the significance of each risk; and implement appropriate procedures and controls to minimize the identified risks.

## 3 | **Quality**

We expect our suppliers to strictly adhere to any applicable quality requirements, instructions, guidance or laws, including NDX's quality standards. Suppliers shall fully cooperate with any audit or document request from NDX or any regulatory authority.

## 4 | **Performance Objectives with Implementation Plans and Measures**

We require Suppliers to develop and outline performance objectives and implementation plans, including assessments of performance against those specified objectives.

## 5 | **Verification**

We require Suppliers to maintain documentation to verify compliance with the Supplier Code of Conduct and applicable laws and regulations.

## 6 | **Scope**

This Code applies to any company that provides supplies to NDX, including, but not limited to our materials and service providers and their subcontractors. This Code is not exhaustive; suppliers are required to use their own discretion to ensure compliance with unaddressed topics. For additional information regarding our requirements, refer to our general NDX Code of Conduct on our website at [www.nationaldentex.com](http://www.nationaldentex.com)



## **7 | Legal Compliance**

We require our suppliers fully comply with quality requirements and all laws, rules and regulations applicable to their operations.

## **8 | Ethics**

We expect the highest standard of ethics, integrity and responsibility in all our operations and endeavors. Suppliers are required to be ethical in all aspects of their business, practices, operations and relationships.

## **9 | Business Integrity**

We hold all of our suppliers to the highest ethical standards. Suppliers may not engage in bribery, embezzlement, extortion or other corrupt practices.

## **10 | Accuracy of Business Records**

We are committed to the integrity of our business records and ensuring that our books, records, and financial reporting are accurate and complete. We require suppliers to maintain up-to-date business and financial books, records, and statements to demonstrate compliance with applicable laws and regulations. Upon NDX's request, these records must be made available.

## **11 | Disclosure of Information**

We expect Suppliers to accurately record and disclose information regarding their business activities without falsification or misrepresentation, to all appropriate parties and as required by law.

## **12 | Fair Competition and Antitrust**

We require our suppliers to conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate.



### **13 | Conflicts of Interest**

Suppliers may not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests and/or obligations to NDX. We expect our Suppliers to immediately notify NDX if any conflicts of interest arise.

### **14 | Anti-Bribery/Anticorruption**

Suppliers may never engage in any kind of bribery or kickbacks, including promising, offering, providing or authorizing anything of value to a government official or political entity to gain an unfair business advantage. Government officials can include anyone who receives any government reimbursement or payment for their medical or dental services provided to patients. We expect Suppliers to be in full compliance with all applicable foreign and domestic anticorruption laws.

### **15 | Gifts and Entertainment**

Suppliers may not offer or accept anything of value from business partners to obtain unfair business advantages. Any gifts or entertainment must comply with applicable laws and regulations. “Gifts and entertainment” include anything of value, such as loans, prizes, meals, tickets or gift certificates.

### **16 | Confidentiality/Privacy**

In order to conduct day-to-day business with NDX, Suppliers may need access to confidential/ private records. Suppliers must ensure this information is protected and remains confidential and abide by all applicable data privacy laws and regulations. Suppliers may not disclose this information unless given written permission from NDX.

### **17 | Intellectual Property**

Suppliers must respect NDX’s intellectual property rights, including processes, information, technology and customer information. Suppliers are required to take all reasonable efforts and necessary precautions to safeguard their knowledge and protect intellectual property rights.



## **18 | Speaking Up / Whistleblower Protection and Anonymous Complaints**

Suppliers are expected to create and maintain an anonymous complaint system for managers and workers to report workplace complaints. Suppliers must protect whistleblower confidentiality and prohibit retaliation.

## **19 | Workplace Standards**

Suppliers are required to follow all general workplace standards and must comply with all applicable laws and regulations, including those that relate to labor, wage, working hours, discriminatory hiring and employment practices, and health and safety. This commitment establishes and ensures a safe working environment for all employees.

## **20 | Nondiscrimination**

Suppliers may not engage in or tolerate any discriminatory conduct against any person on any basis, including race, religion, gender, disability, nationality, veteran status, union membership, political opinion or any other class protected by law.

## **21 | No Harassment**

All workers have a right to a workplace free of harassment and abuse. We require that our suppliers prohibit all types of harassment including, but not limited to, physical, verbal, psychological and sexual harassment.

## **22 | No Substance Abuse**

Suppliers must create and maintain a workplace free from the illegal use, possession, sale or distribution of controlled substances.

## **23 | No Forced Labor**

Suppliers must ensure that all work is on a voluntary basis. Suppliers may not use or tolerate the use of any illegal form of forced labor, including trafficked, bonded, slave, indentured or prison labor.

## **24 | Terms of Employment**

Suppliers are expected to provide their employees with an environment respectful of human dignity and of their fundamental rights.



## 25 | **Child Labor**

Suppliers must not use child labor. All employees must be of at least legal age established by working age laws of their country of operation. To ensure compliance, suppliers must create and maintain official and verifiable documentation of each of its employees' ages.

## 26 | **Working Hours**

Suppliers must comply with all applicable laws and regulations regarding working hours, break periods and overtime hours in any jurisdiction where the supplier operates.

## 27 | **Wages and Benefits**

Suppliers must pay employees in accordance with applicable wage laws, including minimum wage, overtime hours and mandated benefits in any jurisdiction where the supplier is located. Employees must not be expected to work additional hours to earn minimum wage for a day's work.

## 28 | **Freedom of Association and Union Association**

Suppliers must recognize, respect, and protect employees' lawful rights to freely associate and collectively bargain in accordance with applicable laws and regulations and without fear of retaliation.

## 29 | **Immigration**

Suppliers must comply with applicable immigration laws and regulations in any jurisdiction where they operate and only employ workers with a legal right to work in the relevant location.

## 30 | **Subcontractors/ Third Party Employment Agencies**

We must be informed of all subcontractors who affect or interact with supplier's services to NDX. Suppliers are responsible for educating and training subcontractors and ensuring subcontractors are compliant with the provisions of this Code and the law.





### **31 | Health and Safety Practices**

#### **Overview Sentence**

Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they operate. Suppliers are expected to provide employees with a healthy and safe workplace, including access to clean, safe and reasonable working conditions.

### **32 | Occupational Safety**

Suppliers must protect workers from exposure to chemical, biological and physical hazards, in addition to onsite accidents. Suppliers are expected to identify, evaluate, and manage these occupational health and safety hazards and have a program for compliance.

### **33 | Emergency Prevention Section**

Suppliers must identify and assess potential emergency situations in the workplace. Suppliers must develop and implement emergency plans and response procedures, including but not limited to, fire alarms, fire drills, exit facilitates, fire detection and suppression equipment, and

recovery plans to minimize harm to life and property.

Suppliers must regularly test emergency preventative methods, such as fire alarms, to ensure that they are in working order.

### **34 | Infectious Disease Preparedness and Response**

Suppliers must develop, implement, and maintain a program to prepare for, prevent and respond to the potential of an infectious disease outbreak among its employees.

### **35 | Incident Management**

Suppliers must create and maintain procedures to prevent, manage, track and report employee safety incidents. Suppliers are expected to implement corrective action plans to mitigate risks, provide necessary medical treatment and facilitate employees' return to work.



### **36 | Housing Facilities**

Suppliers must adhere to legal requirements when providing housing facilities to employees. Suppliers must follow legal requirements for the amount of living space in sleeping quarters, clean toilet facilities, potable water, and sanitary food preparation and eating facilities. Living spaces must be distinct from the factory/ production area and separated by gender.

### **37 | Sustainability**

We recognize our responsibility to the environment and seek to operate sustainably. Suppliers are expected to apply a continuous improvement approach to enhance their environmental performance and reduce their environmental footprint. Suppliers must follow all applicable laws and regulations regarding environmental practices.

### **38 | Disaster Plan**

Suppliers must develop a disaster plan for their business that takes into account supply chain and customer impact and plans to address disasters on an emergency basis.

### **39 | Hazardous Waste**

Suppliers must create and maintain systems to ensure the safe handling, movement, storage, disposal and management of hazardous materials. Suppliers are expected to train employees on how to handle hazardous material.

### **40 | Wastewater and Solid Waste Emissions**

Suppliers must monitor, treat, control, manage, and properly dispose of wastewater and solid waste. Suppliers must comply with all applicable waste management laws and regulations.

### **41 | Air Emissions**

Suppliers must identify, manage, reduce and properly dispose of air emissions that pose a hazard to the environment. Suppliers are expected to conduct routine monitoring of the performance of their air emission control systems.



## **42 | Pollution Prevention**

Suppliers must strive to reduce consumption of resources, including raw materials, energy and water. Suppliers are expected to implement improvement plans for waste reduction, recycling, and energy conservation policies and seek ways to use cleaner sources of energy.

## **43 | International Trade Regulations**

Suppliers shall adhere to all international trade regulations, sanctions and embargo requirements. Suppliers must acknowledge that NDX is a U.S. company and must adhere to U.S. trade requirements and laws. Suppliers should notify NDX immediately if they believe there is an issue that may violate U.S. trade laws.

## **44 | Conflict Minerals**

Suppliers and their subcontractors must not use conflict minerals, whose obtainment is linked to human rights violations. Suppliers must comply with any information and reporting requested by NDX.

## **45 | Permits and Reporting**

Suppliers must obtain and maintain all required environmental permits. Suppliers must comply with the reporting requirements of applicable permits and regulations.

## **46 | Audits and Inspection**

We can audit our suppliers at any time to ensure compliance with the standards in this Supplier Code of Conduct. If permission to conduct an audit is denied, consequences up to or including termination of our agreement may occur.

## **47 | Penalties for Noncompliance**

Part of conducting business with NDX includes compliance with this Supplier Code of Conduct. We have the right to terminate business with a supplier who fails to adhere to the code. If it is determined that a supplier does not adhere to the Code, they must correct their actions to ensure compliance with the requirements outlined in this document.



National Dentex ■ [NationalDentex.com](https://NationalDentex.com)

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