

## Code of Business Conduct and Ethics - Introduction Amendment

### BRIEF DESCRIPTION OF AMENDMENT TO CODE OF BUSINESS CONDUCT AND ETHICS

1. On February 26, 2014, the Board of Directors of Align Technology, Inc. approved Align's revised Code of Business Conduct and Ethics. *The revised Code of Ethics can be found on the Corporate Information/Investor Relations page of our website at [www.aligntech.com](http://www.aligntech.com).* The purpose of the amendments was to update the Code of Business Conduct and Ethics to reflect international laws as well as other business and regulatory developments in order to provide additional guidance and greater detail about various matters. These matters include:
  - o gift giving and receiving,
  - o data privacy,
  - o anti-corruption,
  - o sponsorship and charitable donations

The Code of Ethics now includes:

- o greater specificity related to the Foreign Corrupt Practices Act and UK Bribery Act of 2010, including that our zero-tolerance approach to bribery and corruption must be communicated to all third parties at the outset of our business relationship with them and as appropriate thereafter;
  - o greater specificity related to our gift giving and receiving guidelines, including a specific prohibition on providing gifts or advantages in any form to our customers; and
  - o specific reference to the European Union data protection laws as well as to the Health Portability and Accountability Act of 1996 (HIPPA).
2. On October 9, 2008, the Board of Directors of Align Technology, Inc. approved Align's revised Code of Business Conduct and Ethics. *The revised Code of Ethics can be found on the Corporate Information/Investor Relations page of our website at [www.aligntech.com](http://www.aligntech.com).* Several changes that are not material were made in an effort to unify the language of the Code of Ethics with the language used in the Employee Handbook and other employee materials. The principal material change was to incorporate into the Code of Ethics employment and work place environment that were previously stand alone policies. The Code of Ethics now includes Section III.A-D which addresses the following matters:
    - o Equal Employment Opportunity Employer
    - o Anti-Harassment and Discrimination
    - o Policy Against Workplace Violence
    - o Commitment to a Drug Free Workplace

In addition, the following changes were also made:

- o The Board clarified that supervisor/subordinate relationships were prohibited;
  - o The Board included sections on "Handling Confidential Patient Information" and "Entering Into Contracts", which were previously a separate policies;
  - o The Board amended the complaint handling procedures to reflect the migration from reporting complaints using [www.compli.com](http://www.compli.com) to Align's new reporting system hosted on [www.ethicspoint.com](http://www.ethicspoint.com).
  - o The Board clarified and enhanced the internet/email policy.
  - o The Board included a specific reference to what initial steps Align personnel should take immediately following the receipt of a complaint.
3. On February 22, 2005, the Board of Directors of Align approved Align's revised Code of Business Conduct and Ethics (the "Code"). The revisions to the Code include, but are not limited to, the following:
    - o conforming the mechanics used to report violations of the Code to those in place on Align's online compliance website [www.compli.com](http://www.compli.com);
    - o expanding the areas addressed under certain sections of the Code, including, but not limited to, expanding the discussion of the duty to come forward and the obligation to provide full, fair, accurate, timely and understandable disclosure in reports and documents Align files with, or submits to, the Securities and Exchange Commission and in any other public communications; and
    - o clarifying how related party transactions are reported and approved and how complaints will be investigated.
  4. On February 28, 2012, the Board of Directors of Align approved Align's revised Code of Business Conduct and Ethics (the "Code"). The revisions to the Code, include, but are not limited to, the following:

- Amending the complaint handling procedures to improve the consistency between the Code of Ethics and the Whistleblower Policy;
- Amending Section III.H of the Code to conform with Align's Marketing Code of Conduct; and
- Amending Section IX.G of the Code to clearly refer to prohibition on entering into any agreement, arrangement, promise or commitment that is not contained in our standard terms and conditions.