

1.0 Purpose

Align’s Global Speak Up Policy provides the framework for when we must speak up about conduct that may be inconsistent with Align’s Global Code of Conduct, Align’s policies and procedures, or the law; and for how Align implements this commitment to speaking up. Following this Policy allows Align to respond to concerns and questions promptly and objectively; and, to be fair to those who speak up.

2.0 Scope

This Policy applies to: Align current and former directors, officers, and employees; Align third party business partners, such as contractors, consultants, suppliers and distributors and Align customers. Since the laws on speaking up may differ by country, it’s important to review Align country-specific policies as well.

3.0 Policy

Directors, officers, employees, our third-party business partners and our customers must conduct Align’s business ethically, honestly and legally and raise concerns about improper business practices.

- Concerns may be raised anonymously.
- Confidentiality will be respected to the extent possible.
- Align will investigate concerns in a timely, thorough and objective manner.
- Align will treat those involved fairly when speaking up in good faith.

4.0 Procedures

4.1 How to speak up

You may speak up directly to:	<ul style="list-style-type: none"> • Your manager or any member of management • Business partner relationship manager • Human Resources • Legal • Finance • Internal Audit • Global or Regional Compliance and Ethics team • compliancehelp@aligntech.com • The Board’s Audit Committee
You may speak up anonymously:	<ul style="list-style-type: none"> • From any computer at www.ethicspoint.com by clicking "File a new report" • In the U.S. and Canada by calling toll-free 1-888-359-6313 (there is no caller-id and callers do not have to identify themselves unless prohibited by law) • If outside of the U.S. or Canada, toll-free numbers can be found on Smile Central or the Align portal at www.ethicspoint.com

4.2 When to speak up

You should immediately speak up any time you believe that conduct may have violated or will violate Align’s Code, Align’s policies and procedures, or the law. For example, you should immediately report:

- Unethical, dishonest, or illegal behavior;
- Accounting or financial irregularities or inaccuracies;
- Inaccurate or incomplete audit or financial reports;
- Improper or unusual payments from or to outside entities or persons;

- Improper or unusual transactions or agreements;
- Fraudulent behavior such as fake vendors;
- Improper use of confidential or private information;
- Risks to health and safety;
- Harassing, discriminating, or bullying behavior;
- Conduct that negatively impacts Align's financial assets or other resources; or
- Conduct that may violate laws and regulations

When speaking up, you do not need complete information since Align's Global Compliance and Ethics (GCE) will gather relevant facts. However, speaking up in bad faith may result in disciplinary action. If someone speaks up to you, you should direct the concern to GCE. Do not investigate the concern yourself.

4.3 Responding to reports

Once a report is received, regardless of the method, the GCE team must be notified and will determine how the report should be handled. Employees are expected to cooperate in investigations and should not conduct investigations. To the extent possible, Align will update those who speak up on how the matter was addressed. For example, updates may not be possible if the report was submitted anonymously.

4.4. Protecting confidentiality and anonymity

Align protects the confidentiality and anonymity of those who speak up and participate in investigations to the extent practical to do so and as permitted by law. Align also protects the confidentiality of those who may be subject to discipline because of an investigation. Align will not ask anonymous reporters to identify themselves. However, Align may disclose the identity of those who speak up if needed but only if the disclosure is reasonably necessary to investigate issues raised and with written consent of those who speak up.

4.5 Fair treatment

Align strictly prohibits unfair treatment of those who speak up in good faith about possible violations of our Code, our policies and procedures, or the law. Unfair treatment or retaliation may include:

- Termination
- Negative performance reviews
- Disciplinary actions
- Changes in job duties or job position
- Harassing, intimidating, or bullying behavior

Immediately contact GCE or your Regional Compliance and Ethics (RCE) team if you believe you or someone else is being treated unfairly for raising a concern.

5.0 Responsibility and Resources

Align's GCE team is responsible for Align's Global Speak Up Policy. Align's Global Speak Up Policy can be located on Align's internal and external websites, and at www.ethicspoint.com. Questions about this Policy should be directed to Align's GCE or RCE teams or sent to compliancehelp@aligntech.com.