

A modern office lounge area featuring a long, low blue fabric sofa. In front of the sofa are two round wooden tables, each with two black wicker-style chairs. The wall behind the sofa is light grey and features large, abstract, layered cutouts in shades of blue and grey. The ceiling has exposed wooden beams with hanging green plants and modern lighting fixtures, including two glass globe pendant lights and several cylindrical track lights. A dark grey horizontal bar is at the bottom of the image.

# Global Code of Conduct



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Align Technology is changing lives through better smiles. We reimagine and reinvent the way orthodontic and restorative treatment is presented and delivered to millions of people around the world through our network of Invisalign® trained doctors, and our iTero® intraoral scanners.

We know a smile is universal.

Our commitment to conducting business with integrity is also universal and is consistent with the highest legal and ethical standards.

Align's Global Code of Conduct (the "Code") defines the standards we each must follow so that we may conduct the business of Align with integrity and in compliance with laws.

Although the Code cannot and does not explicitly cover all conceivable situations or circumstances employees face, it should be followed to ensure compliance with our conduct expectations and local law and regulations. Align also provides policies, procedures, and other internal resources that must also be followed.

**This chapter covers:**

- A message from our CEO
- Align's values
- Our commitment to integrity
- Speaking up
- Where to go for more guidance

# Operating with integrity



## Dear team,

At Align, we are accountable to one another and to all our stakeholders – our customers and their patients, our business partners, investors, regulators, and the communities where we work. We are each accountable for conducting our business with integrity and complying with the law. In doing so, we increase the value of our company, build trust with our stakeholders, and we protect our reputation – one of our most valuable assets.

Our business and industry are subject to complex laws, rules, and regulations. We all need guidance and support to understand and to follow these requirements. Our Code – along with our policies and procedures – provides us with the compliance framework and ethical standards to meet these requirements.

Conducting our business with integrity is as essential as the business results in themselves.

So, we expect our customers and our business partners to operate with integrity and to follow the law. And we support them in doing so by following our policies and procedures.

Although Align's Code establishes the standards necessary to make ethical decisions and follow the law, the Code cannot address every situation. We are each responsible for speaking up, seeking guidance, and applying sound judgment when it's not clear what we should do.

Our commitment to ethical decision-making, and compliance with laws, facilitate our mission to transform smiles, lives, and our industry.

Thank you all for knowing and following our Code.

Joe Hogan, CEO

## Our values

### Agility

**speed | simplification | flexibility**

Moving with speed and agility is critical in our business and our industry. We develop solutions rapidly, evaluating alternative solutions that ultimately make things easier for our customers. We are constantly looking for ways to remove unnecessary complexity, enabling us to adapt to a changing market.

### Customer

**curiosity | empathy | innovation**

Delighting customers is at the heart of what we do. We understand customer expectations, treat their problems as our own, and tailor our solutions to their needs. We genuinely care about our customers.

### Accountability

**responsibility | ambition | results**

Accountability for delivering against our expectations, every time, is at the core of who we are. We hold ourselves to the highest standards with regard to our work, our professionalism, and our outcomes. We own our results and do not blame others. We are always looking for better ways to work and deliver impact, taking lessons from both our internal and external environments.

## Our purpose

Transforming  
**smiles**  
changing lives

## Our commitment to integrity

At Align, we conduct our business honestly and ethically by following the law and doing the right thing while providing our customers and their patients the highest quality products and services. We are each accountable for complying with the law, our Code, and our policies and procedures.

### Our Code applies to Align:

- Operations and subsidiaries around the world
- Officers, directors, and employees
- Third parties acting on our behalf
- Customers

As a global medical device company Align is subject to complex laws, regulations, and standards of each country in which we operate. These requirements often differ by country so knowing and following the law can be challenging.

Align supports all of us in making ethical business decisions and in following the law through our Code, policies, and procedures, along with guidance from our Global Compliance and Ethics team.

Our Code provides a set of unifying standards and where to go for guidance as we make ethical decisions and comply with these complex requirements. Our Code also includes examples of what to look out for to avoid unethical or illegal conduct.

### Compliance is everyone's responsibility

We are Align, the company behind the smile. Our customers and their patients depend on us. Each one of us has a responsibility to perform our business the right way, every day, and everywhere. Acting with integrity ensures sustainable growth and builds a competitive advantage. Align's leadership and its Global Compliance and Ethics team empower you to do the right thing, and our Code, policies, and procedures provide you the guidelines for doing the right thing.

Failing to follow our Code, policies and procedures, or the law may result in discipline including termination and, depending on the situation, may even result in civil and criminal penalties that may damage our reputation, our value, and we may lose business.





## Speaking up

We hold ourselves and each other accountable for delivering against our promises and for performing our work with quality and integrity. We are also accountable for respecting one another, our customers, and our business partners. And finally, we are responsible for complying with laws and our professional obligations.

So, we must speak up when we see something that may be inconsistent with this commitment, does not seem right, or when we need additional guidance to do the right thing.

Even if uncertain about whether something is improper, we must still speak up and seek guidance. Once a report is received, regardless of the method, The Global Compliance and Ethics Office 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.

Our commitment to integrity is built on trust, which we develop by listening to those who speak up. Align strictly prohibits unfair treatment, including retaliation, of those who speak up in good faith about possible violations of our Code, our policies and procedures, or the law.

Throughout our Code, there are examples of when you should speak up – that is, what we each need to “Look out for.”

### You may speak up directly to:

- Any Align manager or any member of management.
- Business partner relationship manager
- Human resources
- Legal
- Finance
- Internal audit
- Global or regional compliance
- [compliancehelp@aligntech.com](mailto:compliancehelp@aligntech.com)
- The members of Align’s Audit Committee of its Board of Directors.

### You may speak up anonymously:

- From any computer at [aligntech.ethicspoint.com](http://aligntech.ethicspoint.com) by clicking “File a new report” or by calling the provided country specific phone numbers.
- By scanning this QR code on any mobile device.



- There is no caller-ID.
- Callers do not have to identify themselves unless required by law (unless prohibited by law).

## Where to go for more guidance

Reach out to Align's Global Compliance and Ethics team or to your Regional Compliance and Ethics team with questions or for more guidance about the Code.

On Align's SharePoint sites and Align Connect, find policies, procedures, guidance, and training that supports us doing business with integrity and in compliance with our Code, policies and procedures, and the law. This includes country-specific policies, procedures, and guidance.

### Align SharePoint sites have information on:

- Align's Speak Up helpline
- Align's Compliance and Ethics program
- Global policies, procedures and training
- Regional, country-specific policies, procedures and training

### Acting honestly and ethically is everyone's responsibility, so:

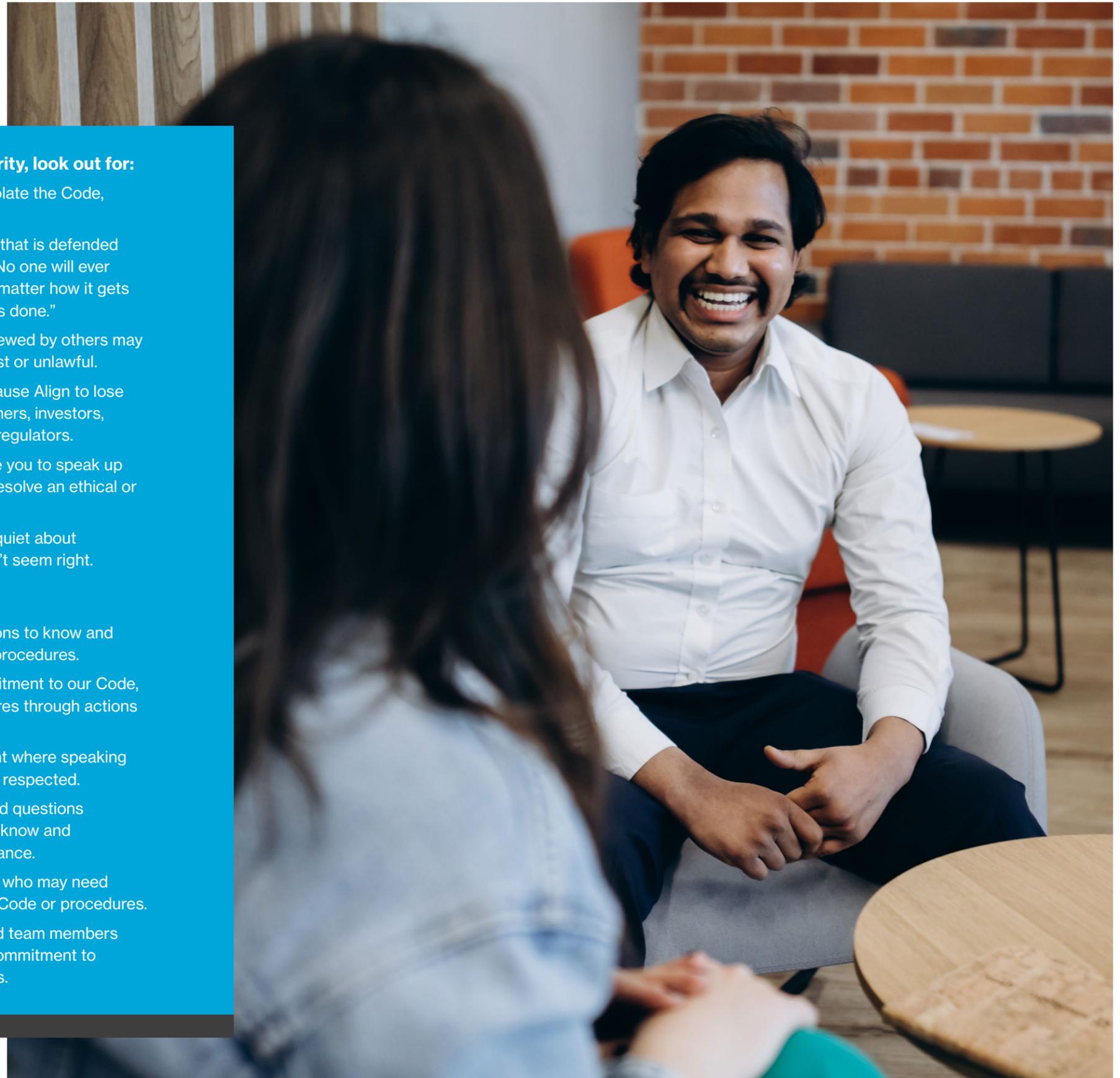
- We cannot assume someone else will correct a problem. We must act.
- We must check on any practice we think is unethical even if it's the way we have always done it.
- We must know the policies and procedures that apply to our job and to the region where we work.
- We must make decisions with integrity.
- We must exercise good judgment.
- We must ask questions and seek guidance when we aren't sure what to do.

### To operate with integrity, look out for:

- Practices that may violate the Code, policies, or the law.
- Decisions or conduct that is defended with comments like: "No one will ever know..." or "It doesn't matter how it gets done as long as it gets done."
- Conduct that when viewed by others may appear to be dishonest or unlawful.
- Conduct that could cause Align to lose credibility with customers, investors, business partners or regulators.
- Situations that require you to speak up or seek guidance to resolve an ethical or legal issue.
- Being asked to keep quiet about something that doesn't seem right.

### If you are a manager:

- Emphasize expectations to know and follow our Code and procedures.
- Demonstrate a commitment to our Code, policies, and procedures through actions and words.
- Create an environment where speaking up is encouraged and respected.
- Escalate concerns and questions to those who need to know and who can provide guidance.
- Guide team members who may need support to follow our Code or procedures.
- Recognize and reward team members who demonstrate a commitment to compliance and ethics.



Protecting Align's assets adds value for all our stakeholders – our customers and their patients, our investors, our communities, and one another.

**This chapter covers**

- Financial and corporate records
- Confidential information
- Protecting assets
- Asset security
- Anti-money laundering

# Protecting our assets

## Financial and corporate records

As a publicly-traded company, we maintain the trust of our stakeholders and the market by assuring that our financial and corporate records are accurate, complete, and up-to-date. Our investors, leadership team, business partners, and the government rely on our records to make informed decisions about Align's business operations.

We are all accountable for making sure we are honest when we create records. Our records should accurately and completely reflect the transaction and all costs or fees associated with transactions. Failing to properly record transactions may result in inaccurate information being provided to our stakeholders or construed as an effort to hide improper payments or corrupt activity.

To make sure we get this right, Align regularly tests and updates our internal controls to help ensure that our records are accurate, complete and current; and that Align conducts business with integrity and in compliance with the law. To do this, we rely on our internal and external auditors to hold us accountable. In turn, our auditors count on us to provide the information they need.

We also must be sure that all of our government filings are accurate and current.

By law we are required to maintain and secure the records that support our financial statements and corporate communications. We are each responsible for knowing the document retention schedule for the records that we create or maintain.

In the event records are placed on a "legal hold", we must preserve those records and follow any other instructions concerning those records as long as the legal hold is in place.

### Look out for:

- Overstating or misrepresenting travel and entertainment expenses.
- Submitting erroneous time sheets.
- Incomplete or inaccurate invoices from our business partners.
- Requests from the media, financial analysts, or others about Align.
- Mistakes that may result in Align's financial statements or corporate records being inaccurate.
- Out of date business records.
- Documents that must be maintained because of a legal hold.
- **Managers:** ensure team reports are current, accurate and complete.

## Confidential information

In our work, we are trusted with non-public confidential information that belongs to Align, to our customers and to our business partners which must be secured and protected. We are also entrusted with the personal information of our customers and their patients, of our business partners, and the personal information of our employees. Some of our most important confidential information is the intellectual property of Align and of others. Whether confidential information is electronic, hard copy, or verbal we must protect it.

### Confidential information

Align's confidential information includes our intellectual property and information about our innovations – our patents, copyrights, and trade secrets. It also includes the identity of our customers and business partners as well as our business strategies, marketing and business development plans, and information about our financial and business operations that is not public. Failing to protect Align's confidential information may impact our ability to be responsive to our customers and may impact our competitive position.

We must make sure that Align's confidential information remains secured and protected. We can do this by restricting access to confidential information, keeping confidential information in Align's systems, or on an Align device as well as by transferring it using a secure method. We should be sure to label information as confidential. Align's records and information must be maintained as required by our retention schedules that define how long we must keep records and information.

Just as we must protect and secure Align's confidential information, if we have been properly provided confidential information that belongs to our business partners and customers, we must label and protect it as well.

In the event we share Align's confidential information or receive and must share the confidential information of our customers or our business partners, we must make sure we have a business reason for doing so, obtain approval from our manager, and enter into a non-disclosure agreement before sharing or receiving the confidential information.

These obligations are not intended to prohibit you from communicating directly with or providing information, including information not otherwise protected from disclosure or by any applicable law or privilege, to any regulator or governmental agency or commission regarding possible violations of the law or regulation. You are not required to notify Align if you make such reports or disclosures.

### Intellectual property

Our intellectual property, our patents, trademarks, trade secrets, and our copyrighted materials are our most valuable assets. They are also some of our business partner's most valuable assets. When working with patents, trademarked and copyrighted materials, either Align's or that of our business partners, we must be sure to protect the information and use it consistent with any license or agreement that governs its use. Even if we create Align intellectual property through the performance of our job responsibilities, it is still Align's property.

### Privacy and data governance

At Align, we have access to and hold personal information of others, which is information relating to an identified or identifiable individual, and includes information from our customers and their patients, consumers, and business partners. Patients' personal information is sensitive health information that is protected by a variety of complex laws that differ by country. We are accountable for securing and protecting this personal information, which means we must properly label it, secure it, and only share it with those at Align or outside of Align who are under obligations of confidentiality. We do not use personal information for reasons other than the purpose for which it was collected unless we have consent or a legal basis for the use.

## Protecting assets

We are able to innovate and delight our customers as long as we have the resources to do so. This means we need to protect Align assets: Align facilities need to be secure, safe places to work; the equipment and devices we use for our jobs must be in good working order; and our intellectual property must be identified, classified and secured. It also means we only use Align assets to benefit Align.

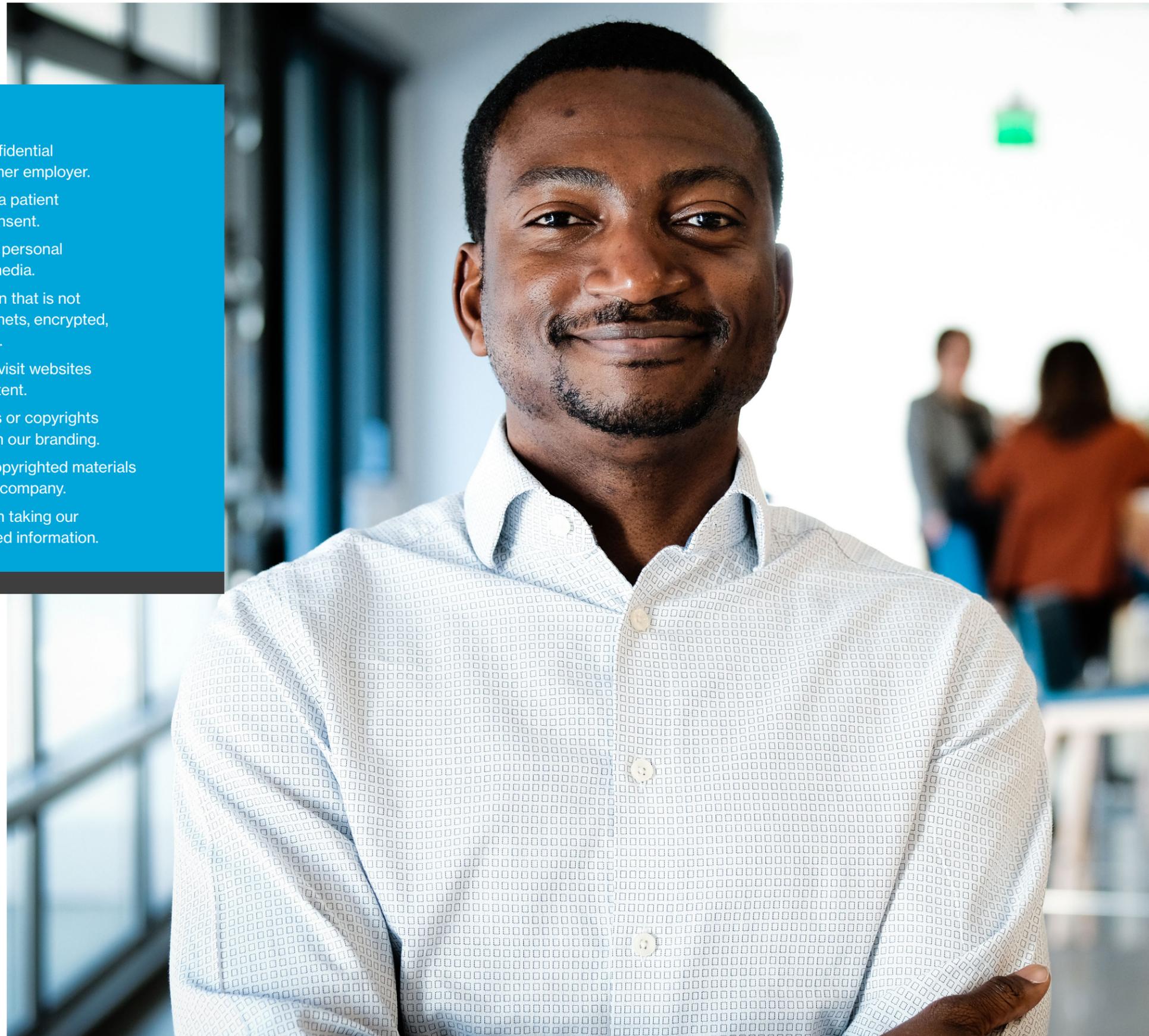
To assure Align facilities are secure, safe places to work, we need to know and follow the procedures for gaining physical access. We also need to make sure that all Align visitors comply with our facility access and safety requirements as well.

Likewise, we must secure and protect Align equipment and resources from loss or misuse. This means that Align equipment and devices should be used primarily for Align business purposes and not for personal benefit. We should never take Align equipment, devices, or even office supplies, and we should never lend or donate Align assets without proper authorization. Remember, although Align provides us with electronic devices, all devices are Align's property and must remain accessible to Align.

Align's intellectual property, our patents, trademarks, trade secrets, and our copyrighted materials are our most valuable assets. They are also some of our business partner's most valuable assets. When working with patents, trademarked materials, and copyrighted materials, either Align's or that of our business partner's, we must be sure to protect the information and use it in compliance with any license or agreement that governs its use. Even if we create Align intellectual property through the performance of our job responsibilities, it is still Align's property.

### Look out for:

- Receiving or using confidential information from a former employer.
- Communicating about a patient without first getting consent.
- Sharing confidential or personal information on social media.
- Confidential information that is not secured in locked cabinets, encrypted, or password protected.
- Using Align devices to visit websites with inappropriate content.
- Using Align trademarks or copyrights that do not comply with our branding.
- Unauthorized use of copyrighted materials that belong to another company.
- Individuals leaving Align taking our confidential or protected information.



## Asset security

Align's assets are vital to our operations. Failure to protect Align's infrastructure or Align devices may jeopardize the security of our network. Align protects our assets by testing and reviewing our infrastructure which includes accessing and reviewing any information received or stored in the Align infrastructure or on an Align device. This often happens without the user's knowledge or consent. So, don't use Align systems or devices for personal information if you don't want other Align colleagues to see it.

We are all accountable for protecting Align's resources. We should never use Align devices or systems in a way that negatively impacts our productivity or the productivity of others at Align.

Any software we want to use on Align's systems or on an Align device must be properly licensed and should not interfere with or damage our technology systems.

### Look out for:

- Emails that contain viruses or other damaging links.
- Software that may not be properly licensed.
- Leaving Align devices unattended in cars or in any public place.
- Align devices that are not password protected.



## Anti-money laundering

We protect our assets by assuring that all our business transactions are legitimate and that any funds we receive are not derived from improper or illegal activities. We are alerted to transactions that may suggest a business partner or customer is seeking to launder money by transferring or hiding money that originated from criminal activities.

We do this by making sure we know who our business partners and customers are and by performing appropriate due diligence. Our due diligence work on business partners and customers should be collected, reviewed, and documented to verify that they engage in legitimate business with us and that none of the funds involved were illegally obtained. We also ensure that any methods used to pay Align are appropriate and standard in the industry and we avoid transactions that seem to be designed to hide or obscure payment arrangements.

### Look out for:

- Requests to create payment structures that are not standard for our customers.
- Requests to use banks in countries unrelated to the transaction.
- Requests from our business partners to make payments to third parties.
- Customers who want to pay in cash.



We are fair in our dealings with our customers and business partners. We also compete fairly and conduct business in an objective, transparent manner free from improper influence or conflicts of interest.

**This chapter covers:**

- Improper payments
- Working with third parties
- Conflicts of interest
- Fair competition
- Insider trading

# Being fair

## Improper payments

Align competes fairly, seeking opportunities based on the value we deliver, and selects business partners based on the quality and values they deliver. We do not use improper payments to get work, to keep work, or to secure or expedite government action, regardless of the country in which we work. We also do not work with business partners who seek to use improper payments on our behalf or who try to use improper payments to obtain our business.

Improper payments are often associated with bribery or corruption. So, we do not offer, promise, or make any payment or give anything of value to obtain an improper business advantage – whether directly or indirectly through a third party. Also, we do not offer, promise, or make any payment or give anything of value to obtain an improper business advantage when working with governments or when working with commercial enterprises.

We must be particularly careful about promising or providing anything of value including gifts, travel, entertainment, or even employment to government officials, employees, close family members, or business partners of government officials or employees because they are often limited or prohibited from accepting items of value – even if there is no improper reason for it. This also means we do not accept improper payments, often called “kickbacks”, as an incentive to award work to our suppliers or distributors or any other business partner.

Even if it is customary to provide something of value or even if our competitors are doing so, we do not do so if it is inconsistent with our Code or procedures.

We also do not use “facilitation payments” to unlawfully speed-up routine governmental administrative actions such as obtaining permits or work visas. Facilitation payments are small value payments which are made to governments to expedite routine government services.

## Working with third parties

Our relationships with customers, suppliers, distributors, sales agents, or any third party must be based on trust and on a shared commitment to ethical and legal business conduct. Our reputation may be damaged if one of our customers or business partners behaves unethically or illegally when doing business on our behalf.

Just as we hold ourselves accountable for following the law and for making ethical decisions, we hold our third-party business partners and customers accountable as well. We do not ask our third-party business partners or customers to do something that is against our Code, policies and procedures, or the law. We expect our customers and our third-party partners to avoid conflicts of interest and avoid any type of illegal or improper payments or business relationships. We expect our business partners to comply with trade laws, environmental laws, wage, and employment laws, and to respect human rights and treat others fairly.

We select our suppliers based on the value they provide after considering the quality of their goods and services, their price, their experience, and the terms of their agreements. If suppliers are significant to our operations, we use a competitive process to select the supplier who is the best fit. We also look for diversity when selecting our suppliers and distributors.

We expect our business partners to adhere to these same ethical and legal principles when they do work for Align. So, when selecting and managing our third-party business partners, customers, and suppliers, we conduct due diligence to make sure there is nothing in how they operate that indicates they may not comply with our ethical requirements and with the law. We also make sure our expectations are clear by having a contract in place with our customers and our third-party business partners that clarifies the terms of our relationship and requires they conduct business compliantly and ethically.

### Look out for:

- Third parties who do not demonstrate the same commitments that we make in this Code, the contract terms, or the law.
- Activities or statements that may be construed as a request for a kickback or improper payment.
- Expense reports or invoices that do not contain sufficient detail and do not include supporting documentation.
- Requests for commissions that are out of the ordinary or that are not consistent with industry standards.
- Requests for agreements that do not include a clear, defined statement of work.
- Requests from business partners to pay other entities.
- Due diligence reports that include information suggesting a potential or current business partner does not have the same ethical standards as we do, for example, they are under investigation for corrupt behavior.

## Conflicts of interest

As part of being fair, we must demonstrate through our actions and through appearances that our business decisions are objective and transparent and that our Align work is not in conflict with our personal interests. This means we avoid and disclose relationships, business interests, or financial interests that create an actual or potential conflict of interest or that imply we are not being fair or that we may be unfair. We need to be alert to possible conflicts of interest since a conflict may arise in any number of ways.

Giving or even asking for gifts, meals, entertainment, or anything of value when doing business for Align may create a conflict of interest or an appearance of a conflict of interest. This does not mean we cannot engage in hospitality, entertainment, or gift-giving if doing so is allowed under our global or local policies and processes, has a justifiable business purpose, and is permitted under local law.

Conflicts of interest or the appearance of a conflict may arise if our family members or close friends work for Align or do business with Align. We should avoid making hiring decisions related to family members, significant and close friends, and we should not supervise or award work to our family members, significant or close friends.

Some outside activities such as other employment or accepting a position as an officer, director, or even investing in another organization, whether for-profit or non-profit, may create an actual or perceived conflict of interest. In such situations, we must disclose the actual or potential conflict of interest and seek permission from our manager before accepting a position outside of Align.

### Look out for:

- Having financial interest in a company that could benefit from Align's business.
- Taking a part-time job that requires time during normal Align working hours.
- Using Align supplies or devices for a part-time job or for personal benefit.
- Receiving gifts, meals, travel, or favors from suppliers or others who want to do business with Align.
- Giving gifts, meals, travel, or favors to customers, business partners or competitors that may appear to be extravagant or that have no business purpose.
- Providing free or improperly discounted products to potential customers or customers in exchange for increased sales.
- Directing business to a company that is owned or managed by a family member or a close friend.
- Hiring, directly supervising, or making a promotion decision about family members or close friends.
- Offers of personal discounts or favors from those who do business with Align.
- Managers: employees or business partners exhibiting favoritism or decision-making based on personal interests.



## Insider trading

Align plays fairly in the financial markets by not using non-public information for our personal benefit or the benefit of family or others.

Since Align is publicly traded, confidential information may, depending on the information, impact the price of Align's stock. This means we do not use or disclose non-public information about Align or about any of our business partners for financial gain or for any other personal benefit. We also do not buy or sell Align stocks, bonds, or any security, or that of our business partners, either directly or indirectly through family, friends, or any other person or business based on non-public information that could impact the price of those securities.

Before trading Align securities, we make sure we can do so because certain positions within Align may have restrictions on when Align securities may be bought or sold. During regularly scheduled trading "blackout periods," all Align employees are prohibited from trading any Align security.

### Look out for:

- Sharing non-public information about Align, especially when the information has the potential to impact Align's stock price.
- Transacting any sale or purchase of stocks or options, even in your retirement account, during a blackout period.
- Selling Align stock short.
- Using Align stock as collateral for loans of debts.

## Fair competition

Align does not make oral or written agreements with competitors or business partners in a way that limits competition.

We do not agree to or collude with other companies to set prices, salaries, or to set the terms we offer to our customers or distributors.

We never agree or collude with other companies to allocate or divide up markets or customers or to manipulate bidding or procurement processes. This means we do not agree with companies, for example, on which geographic markets or which customers to pursue. It also means that we do not agree with companies on who should bid for work.

To make sure Align demonstrates its commitment to compete fairly, we avoid contacts with competitors or other businesses that may create the perception that we are seeking some type of unfair information or understandings. This also means we do not share false or misleading information about Align.

For those of us who previously worked for an Align competitor or who leave Align to work for a competitor, we may not use non-public information to benefit either the new employer competitor or Align.

As part of competing fairly we do not share non-public Align information with governments or competing businesses. Nor do we try to obtain our competitor's confidential information.

### We don't share or ask for competitor information such as:

- Market share
- Pricing
- Customer lists
- Supplier lists
- Distributor lists or distribution practices
- Contract terms
- Production methods or capacity
- Costs or margin
- Sales or business development plans, or
- Information about bids that are being prepared or that have been submitted

### Look out for:

- Developing unapproved initiatives with discounts not offered in Align's published pricing and discounting materials.
- Entering exclusive relationships with distributors.
- Communications or actions that may appear to be unfair or result in unfair competition.
- Offering rebates or free products without reviewing Align's policies.
- Entering into agreements with customers outside Align's standard, published terms, and conditions.
- Discussing prices, output, capacities, sales, profits, or distribution methods with competitors.
- Agreeing with a competitor for either Align or the competitor not to compete, to restrict dealings with suppliers, or to divide up customers, markets, or production programs.
- Influencing the prices charged by our customers or restricting the volumes of their purchases or sales.
- Obtaining competitive intelligence other than through public and freely available information.
- Communicating false information about a competitor's products.
- Communications by a competitor that include information that may be false or misleading.

Supporting the communities in which we work and live includes the dedication of our time, talents, and resources. This has always played an important role in the Align culture. We know that respecting our communities includes providing our support, as well as following the laws that are designed to protect our communities.

**This chapter covers:**

- Corporate social responsibility
- Environmental sustainability
- Public communications and social media
- Working with governments
- Political activity
- International trade



# Respecting our community

## Corporate social responsibility

Align's social responsibility includes philanthropy, our environmental sustainability programs, and the vibrant workplace we create based on our commitment to innovation, agility, and integrity.

As a socially responsible industry and community leader, Align contributes time, talents, and resources to organizations that are part of our industry and are committed to our mission of improving smiles and educating our customers and their patients. We also support our communities by partnering with our employees, customers, and with educational institutions and foundations to improve dentistry around the globe.

## Environmental sustainability

Our social responsibility extends to our respect for the environment. At Align, we facilitate environmental sustainability through our business practices and through programs that encourage each of us and our stakeholders to be more conscious of our environmental footprint. We make sure as an organization that we understand and comply with the environmental laws in each country where we operate.

### Philanthropy

Supporting organizations that tie closely to our business strategy – improving smiles, educating our customers and their patients, and aligning with our customers through partnerships with learning institutions and/or foundations.

### Sustainability

Helping to preserve and protect our environment and the world we live in through our own business practices, and through programs that encourage our employees and other stakeholders to be more conscious of their environmental footprint.





## Public communications and social media

As an industry leader, we have much to share in the field of dentistry and orthodontics. Align regularly communicates through social media, seminars, training, and our informational and promotional materials.

We know that to be a respected industry leader and to make positive contributions in our communities, we need to communicate consistently with our message, with our branding, and as required by the laws that regulate our communications, including any required disclosures. This also means that when we communicate, we are honest and share only accurate and up-to-date information.

We know that working in a highly regulated industry means we must not disclose on social media, either intentionally or by accident, any confidential, competitive, or medical information. We must be cautious on social media when promoting, marketing or even talking about our products and services. Any personal healthcare information concerning the treatment our customers provide to specific patients must be protected at all times and may only be used with the proper consent or other available legal basis.

Align has designated media and finance teams who are responsible for communicating about Align with, for example, the media or the financial community. We do not communicate with the media, the financial community, or post on behalf of Align unless explicitly authorized to do so.

### Look out for:

- Media requests to comment on Align's finances, business, research, or products or services.
- Misstatements, inaccuracies, or outdated information in our promotional materials or other public disclosures.
- Posting on social media any confidential, personal, financial, or health information.

## Working with governments

As a global business in a highly regulated industry, we regularly interact with governments and government officials in many countries. The laws and regulations that we must follow are different in each country and may even conflict with one another.

In many countries, the leaders and employees of hospitals, universities, and some commercial enterprises may be government officials and government employees because the government owns or controls these entities. Anyone who works for a government entity is a government official or a government employee, whether elected, appointed, or hired to work as an employee, and whether working full-time, part-time, or even without pay.

To be engaged and respected in our communities, we must know when we are working with a government entity or with a government official or employee. We also must know and follow the laws that regulate not only our business but the laws that regulate how we interact with governments and how we sell to governments. This means we stay informed of regulatory developments and changes and respond to these changes with policies and procedures designed to assure compliance.

Selling our products and services to governments is different than selling to commercial businesses. When we seek to sell to governments or when we sell to governments, we aim to understand and comply with the unique laws that define government procurement processes and government contract performance. As part of this, we should never access or accept information from government officials, government employees or others about the government's internal selection decisions or about another bidder.

### Look out for:

- Requests to provide a government official or government employee anything of value.
- Offers from government officials or others to share non-public information about government procurements or government regulatory activities.
- New laws and regulations that may change how we do business.
- Subpoenas or other requests for information from government agencies.
- Request for proposals from government agencies that may have complex legal requirements.

## Political activity

Align as an organization is engaged in the political process. As such, Align leaders and employees that manage and participate in the political process for Align know and follow the laws and regulations that regulate the use of Align resources for political purposes.

Likewise, before we approach a federal or local government official or government employee on behalf of Align, our industry, or our customers or patients, we make sure that we have taken the proper steps to comply with lobbying requirements and to assure we are authorized to represent Align. Lobbying includes engaging in any oral or written communication with government employees and officials for the purpose of influencing their decision-making.

Align does not prevent employees from engaging as individuals in the political process. However, unless our job with Align requires us to be involved in Align's political or lobbying activities, any political or campaign activities in which we participate must be done on our own time, using only personal resources, and may not include any reference to Align, including your role at Align.

This means we do not use Align funds or any resources such as Align's email system, email contacts, offices, phones, our time at work or even Align's name to campaign for, raise money for, or otherwise support candidates for public office, political committees, or any political organization or cause.

### Look out for:

- Using Align resources to support a candidate, a political party, or a policy issue whether personally or on behalf of Align.
- Communications or activities that may be considered lobbying when engaging with elected officials.
- Political activity on individual personal or professional social media accounts that includes your role at or business relationship with Align.

## International trade

Respecting our communities means that Align appreciates that each country has laws that regulate cross-border transactions. So before transacting business across borders we need to be sure to comply with trade sanctions and export and import laws and that we avoid improper boycotts of certain nations.

Trade embargoes or trade sanctions are put in place to protect a country's national interests. Embargoes and sanctions generally restrict trade in most products and technologies with embargoed or sanctioned countries. Companies and individuals can also be sanctioned, which means we cannot do business with them regardless of which country they are located in. For example, the U.S. and many European nations have placed trade sanctions against countries, entities, and individuals that support terrorism.

Some countries boycott other nations based on religion or gender. We do not participate in these types of boycotts, for example the boycott of Israel, unless it is a trade sanction or embargo that a government has lawfully implemented.

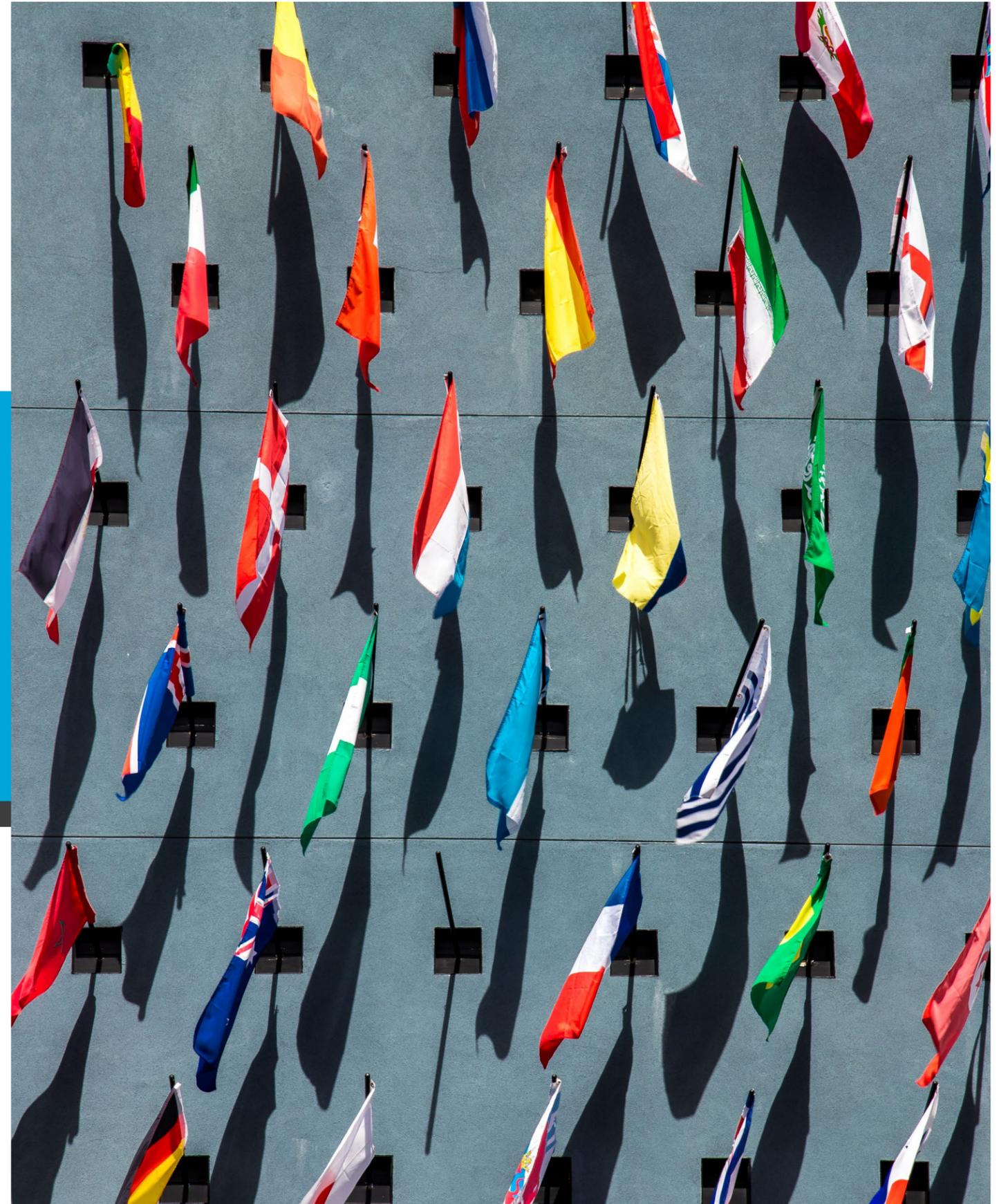
Export laws also regulate how we transfer goods and services to other countries. Export laws even regulate sharing export-controlled goods, technology, and information with foreign nationals who are in the country where we are working.

So, before shipping Align products or sharing Align information with other countries or with foreign nationals, be sure Align has determined that Align can work with that country and has obtained licenses needed to transfer across borders or to foreign nationals.

An important part of international trade is making sure we know to whom we are selling Align products and services and that we know who is supplying or distributing Align products.

### Look out for:

- Emailing or discussing export-controlled information because it is still considered an export.
- Business partners or customers who may be in a country that is sanctioned or embargoed, or that may sell Align products into a sanctioned or embargoed country.
- Doing business in a country that is sanctioned or embargoed, even through a third party.
- Potential business partners or customers who may be sanctioned.



As leaders in our industry, we recognize that Align's products need to be of the highest quality, that our research needs to be done ethically, and that to delight our customers and their patients, we need to comply with the laws and standards that regulate our industry.

**This chapter covers:**

- Interacting with health care professionals
- Our commitment to ethical research
- Our commitment to quality products
- Our commitment to responsible use of data



# Recognizing our obligations

## Interacting with health care professionals

We have built goodwill with Align customers and their patients around the globe. We are committed to preserving this goodwill and maintaining our reputation in the dental industry. Delighting our customers means not only providing them with quality products but also providing value by building relationships based on trust.

This means we are ethical and honest when interacting with health care professionals and others in our industry. It also means we comply with government reporting requirements related to our interactions with health care professionals and others in our industry.

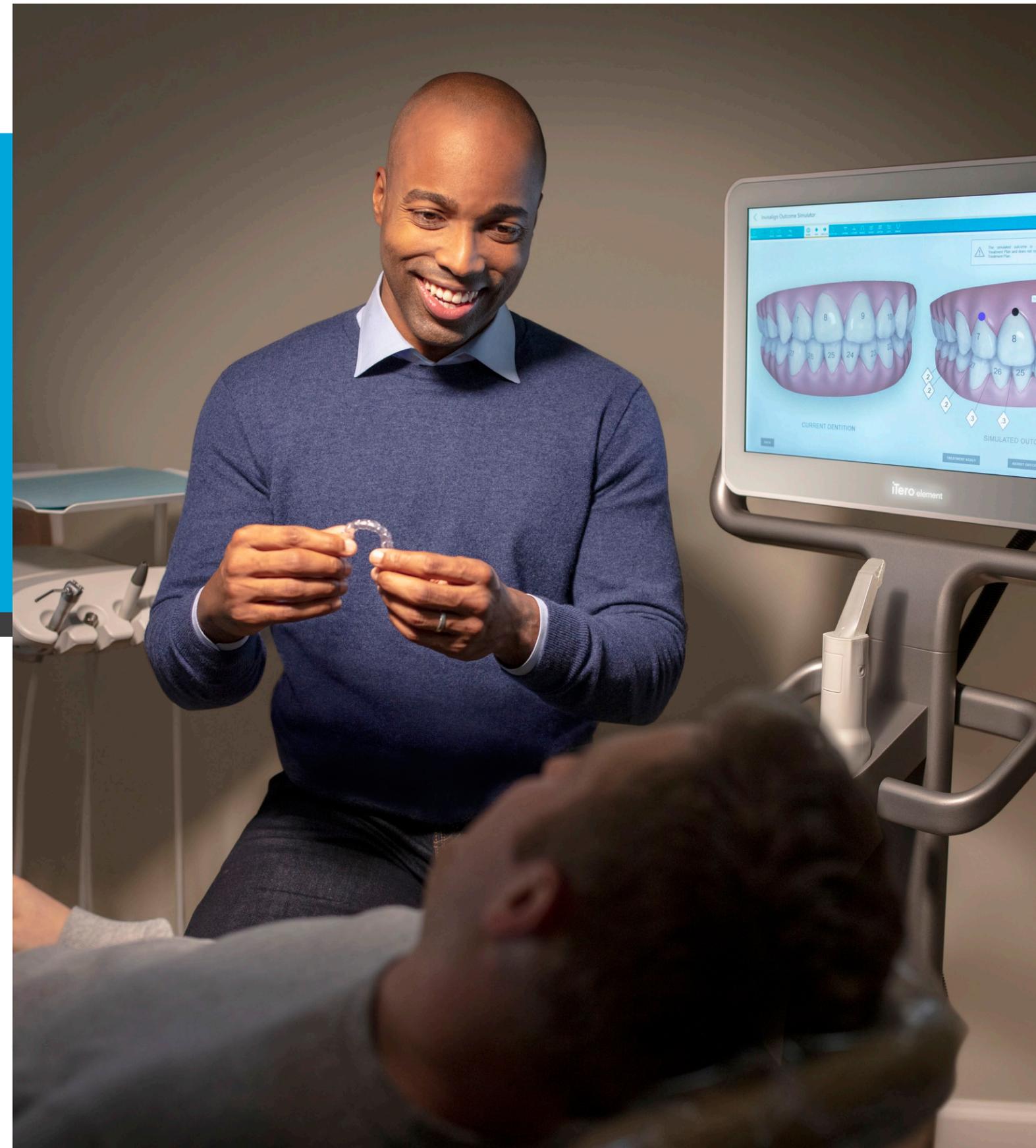
We are committed to developing marketing and sales activities, promotional communications, and product information that are up-to-date, accurate, based on facts and include any information required by law – remembering that laws vary by country.

Additionally, when we share research findings with health care professionals or others, they can be assured that the research is current, accurate, understandable, and based on documented conclusions. We distinguish our promotional or marketing communications from any scientific or dental research findings that we communicate.

Since we also engage with health care professionals to conduct research, to review our products, and to educate others in our industry, we work with them so their contributions on these types of projects, are done honestly, ethically, in compliance with the law, and in compliance with industry standards– which enhances goodwill and builds trust.

### Look out for:

- Unapproved promotional materials that do not accurately describe our products.
- Align seminar speakers seeking payment for side trips after the seminar.
- Research that seems to be unrelated to scientific matters.
- Communications that do not clearly define whether Align is promoting our products or sharing research findings.
- Requests to participate in seminars that are not related to legitimate scientific or dental topics.
- Align payments or other transfers of value to health care professionals that do not reflect fair market value.



## Our commitment to ethical research

Align is committed to ethical research and innovation to improve orthodontic and dental treatment for communities around the globe. We support research and innovation through our own research capabilities, through sharing our knowledge and experience, and through our Research Award Program which supports clinical and scientific orthodontic and dental research.

Research we fund may be basic science or clinical but, either way, we require justification that the research furthers the understanding of the field of dentistry. We review all research applications and seek input from independent committees, and we post on our website the recipients of our grants. We are also sure to carefully review all costs associated with research we fund so costs are consistent with laws and our own policies.

Whether we are conducting research or funding the research of others, we are committed to doing so ethically and in compliance with the law and industry standards to include filing any government required reports about our research or its funding. We appreciate that to be ethical researchers we must protect patient personal information and assure that the research is used to further legitimate dental science. We expect the researchers we fund to do the same.

### Look out for:

- Research funding requests that may not be of a scientific or clinical nature.
- Researchers seeking reimbursement for costs that may not be a direct research cost.
- **Managers:** using promotional materials as if it were scientific research.
- **Managers:** mistakes or unsupported claims in the research reports you review.

## Our commitment to quality products

Although we are agile and develop solutions rapidly, we know that to maintain the confidence of our customers and their patients, as well as to remain respected leaders in the dental industry, we need to consistently assure our products meet the highest safety and quality standards.

Align's quality management system ("QMS") is designed to hold us accountable to this commitment by providing the structure, responsibilities, and procedures required to achieve consistent product safety and quality. Align's QMS is based on industry standards and regulations, and it approaches quality from a global perspective since quality standards may be defined differently in each country where we operate.

This means that no matter where in the world we are working for Align, we must know and follow Align's QMS as well as the policies and procedures that describe our approach to designing, manufacturing, distribution, and monitoring of our products. To facilitate compliance with our quality controls, we document our work, keep accurate and current records, conduct regular audits of our quality and quickly investigate and resolve quality concerns. Our QMS and our compliance with QMS principles prepare Align to engage constructively and honestly with our regulators to consistently meet their needs and those of our customers and their patients.

In addition to holding ourselves accountable for the quality of our products, we also hold our suppliers and distributors accountable for assuring the quality of the products and services they provide.

### Look out for:

- Concerns or questions about the quality and safety of our products.
- Complaints from patients or health care professionals about our products or services and report them immediately.

## Our commitment to responsible use of data

Align is committed to reviewing and monitoring its delivery of data and analytics capabilities, and initiatives that leverage these capabilities, in a fair way. This includes use of artificial intelligence, to meet the needs of our current and future stakeholders, protect our reputation, and comply with applicable laws.

Artificial intelligence, autonomous solutions, and other uses of algorithms that calculate, visualize, or self-learn with reduced human oversight, must comply with applicable laws. To confirm compliance, our use of these technologies are subject to periodic review. When we use these technologies, we provide explanations in plain language about how algorithms collect information and use it to make decisions. Consumers' rights and data privacy requirements must be part of the governance.

When using these technologies for any primary purpose, such as clinical purposes, employee or candidate data, or secondary purposes, such as marketing, research or development purposes, each involved person is accountable for governance by design and compliance with applicable regulatory, data protection, and other applicable laws and policies.

### Look out for:

- Vendors offering new artificial intelligence services, even if those services are not the ones we are purchasing.
- Confidential or personal data being used to train machine learning models or for purposes that do not benefit Align.
- Agreements that do not confirm that Align data will be destroyed immediately after our business purpose is achieved or complete.
- Responses from a tool or model that might be false or used to deliver malware.



# Respecting each other

Align knows that providing a vibrant employee experience encourages inclusion and diversity. It's one that supports health and wellness, and develops personal and professional growth – while allowing each of us to build trust with one another, with our customers and their patients, and with our business partners. We respect and treat one another, our customers and business partners fairly. We strive to have meaningful engagement between management and employees.

**This chapter covers:**

- Fair employment
- Health and safety
- Human rights



## Fair employment

We know that as an innovative, global business we can best accomplish our work by having a workplace that is fair, supportive, and inclusive. We do so by respecting our colleagues at Align and respecting those we work with outside of Align.

We respect one another by treating each other fairly and do not tolerate discrimination, harassment, inappropriate or unwelcome behavior or any behavior that jeopardizes safety. This means we do not share offensive, inappropriate materials or make offensive, inappropriate remarks or comments. We do not discriminate against one another on the basis of race, sex, sexual orientation, color, religion, national origin, age, pregnancy, genetic information, physical or mental disability, citizenship status, veteran status, or any other characteristic protected by law.

Our employment practices are designed to ensure we have the person with the right qualifications and experience for the job. At Align this means we do not use false or misleading practices when recruiting and hiring, and we provide compensation that is competitive and consistent with the laws that regulate minimum wage and overtime. We are committed to providing our employees details about their work, that our employee's wage statements are clear and understandable, and we do not interfere with the right to associate or collectively bargain.

## Health and safety

Align is committed to providing a workplace that protects the health and safety of our employees and our visitors.

To do so, we strive to make sure that our facilities are clean, orderly and that unsafe conditions are quickly identified and addressed. We must all be aware of the emergency procedures at the facility where we work and be prepared to follow those procedures.

We prohibit intimidating behavior, acts, or threats of physical violence that create an unsafe atmosphere.

We are committed to providing a safe work environment and do not work while impaired – for example, by working while under the influence of alcohol, illegal drugs, or substances that impair our ability to do our jobs.

## Human rights

We respect one another by protecting the human rights of others.

We make sure our business partners understand Align's commitment to human rights and that they have the same respect for human rights that we do. We expect our business partners to treat their employees fairly and in compliance with labor and employment laws. We use our due diligence processes and our contracts to make sure recruiters or any business partners we work with comply with fair labor laws and are not using forced labor or child labor.

We are alert to situations that may suggest a business partner is using child labor or forced labor, and will respond quickly to address any human rights concerns such as identity, immigration documents, or individuals being prohibited from returning to their home country.



### Look out for:

- Remarks from customers suggesting they do not want to work with Align employees because of race, sex, sexual orientation, color, religion, national origin, age, pregnancy, genetic information, physical or mental disability, citizenship status, veteran status, or any other characteristic protected by law.
- Jokes or remarks that ridicule or offend.
- Aggressive or threatening behaviors.
- Align workplace conditions that are unclean or unsafe and immediately report any safety concern.
- Workplace conditions of business partners that are unclean or unhealthy.
- Practices that intrude on an employee's privacy.
- Align employees or employees of our business partners that look too young to work.
- Align employees or employees of our business partners who are concerned because their identification or immigration documents have not been returned to them.



Helping change millions of lives, one **smile** at a time.