

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 (“Code”), Align’s policies or procedures, or the law; and for how Align implements its commitment to listening to those who speak up in good faith.

2.0 Scope

This Policy applies to Align Technology, Inc., and each of its subsidiaries, directors, officers, and employees; third party individuals and entities that Align does business with, such as contractors, consultants, suppliers, distributors, other non-employee workers, and Align customers (collectively “We”). Since the laws related to speaking up may differ by region or country, Align may adopt regional or country specific Speak Up processes to ensure compliance with local laws that have more restrictive or specific requirements. Any such local process must be approved by the Align Global Compliance and Ethics Officer (“GCO”).


3.0 Policy

Our commitment to integrity is built on trust, which We develop by listening to those who speak up. When We speak up in good faith, We will not be treated unfairly for doing so. Align will address unfair treatment for speaking up in good faith,

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.

4.0 Procedures

4.1 How to speak up

We may speak up directly to:	<ul style="list-style-type: none"> 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 The members of Align’s Audit Committee of its Board of Directors
We may speak up and self-identify or raise the concern anonymously:	<ul style="list-style-type: none"> From any computer at www.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 

4.2 When to speak up

We must immediately speak up and report a concern when becoming aware of or suspect that an actual or potential violation of the Code, a policy, or other conduct violation, including but not limited to:

- 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;
- A risk to health or 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, we must report the known information related to the concern or question. If We receive a Speak Up concern or question, We must immediately escalate the question or concern to the Global or Regional Compliance and Ethics Office. Align employees may not investigate a reported concern unless designed as the investigator under the below Responding to reports section of this Policy.

4.3 Responding to reports

Once a Speak Up is received, regardless of the method, the GCO must be notified and will determine the best next steps to inquire into the reported question or concern. The GCO or her designee will send acknowledgement of receipt as soon as practical, and not later than seven days after receipt. The GCO or her designee may assign an investigator to inquire into the concern or question.

To the extent practicable, Align will periodically provide an update to those who speak up concerning the reported question or concern within a reasonable timeframe, not to exceed three months.

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 and as permitted by law, including witnesses. This includes restricting access to reports and the Speak Up case management tool to only those with a need to know.

Align also protects the confidentiality of those who may be subject to discipline because of an investigation. Align will not require 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 or required by law or legal proceedings.

4.5 Participating in an investigation and case confidentiality

We may be asked to participate in an investigation as a witness or as someone who has knowledge or documents that relate to a Speak Up. We are expected to cooperate with investigations and requests from an investigator, including:

- Timely, accurately, and completely respond to requests for information; and
- Accept requests to talk with investigators which may include, internal or external personnel, including attorneys or other legal personnel, members of Human Resources, Internal Audit, or other departments or organizations

It is important that We maintain the objectivity of the Speak Up process. Therefore, we may be asked to keep the fact that you were contacted to provide information, interviewed as a witness for a Speak Up case, or keep details of the process confidential, meaning not disclose or discuss it with other employees, Align third party business partners, such as contractors, consultants, suppliers, and distributors, other non-employee workers, Align customers or others who may be involved in the investigation process. Sharing confidential information related to the Speak Up could lead to inadvertently biasing other witnesses which could result in case results being inaccurate. However, you may always contact the

GCO or the Regional Compliance & Ethics Officer with any questions about this Policy or a specific investigation.

4.6 Closing a report

For privacy and confidentiality reasons, the report, details of the investigation, and any information related to specific individuals will not be shared. However, the investigator will inform you when the report has been closed, will provide information about the process, and may provide information about corrective actions that have been or will be taken, if appropriate. Note that it may not be possible to provide these close updates for reports that are submitted anonymously or when no contact information is available.

4.7 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, or participate in a Speak Up. 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 the GCO or Regional Compliance and Ethics Officer if anyone is being treated unfairly for raising a concern.

5.0 Responsibility and Resources

Align's GCO is responsible for Align's Global Speak Up Policy. Align's Global Speak Up Policy is located on Align's internal and external websites, and at www.ethicspoint.com. Align will keep records of reports received, but for no longer than is necessary and proportionate.

Questions about this Policy should be directed to Align's Global or Regional Compliance and Ethics Office, or sent to compliancehelp@aligntech.com.