



Code of Ethics

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Preface



As a leader in the dental industry and as a pharmaceutical company, behaving with integrity is a priority for Septodont, which is committed to the highest standards of ethical conduct and compliance.

Our commitment to ethical principles drives us to take ownership, value excellence, support each other, and forge new paths. Together, these values ensure that we act with integrity and responsibility, fostering trust and respect within our team and with dental practitioners, patients, suppliers, contract manufacturing clients, distributors and our stakeholders as a whole.

Ethics and transparency are Septodont's core values because we design, manufacture and distribute products for medical purposes. These core values are the soul of our company. Our employees are fully empowered and trained to put the interest of patients at the heart of our actions.

Septodont has zero tolerance for any form of corruption. The Group will therefore refuse to initiate any business relationship likely to involve one or more acts of corruption, regardless of its form.

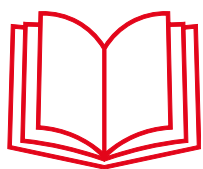
In order to pursue this objective, each Septodont employee must act with integrity and transparency at all times, which implies clear and open communication about the values that guide all our activities. Each Septodont employee must also comply with the policies and procedures forming the Group's compliance program and carefully apply all its operational procedures.

This Code of Ethics recalls the cardinal values of Septodont and describes how these values must be applied on a daily basis. It is imperative that we all act in accordance with these rules and principles.

Septodont expects its professional partners to thoroughly comply not only with applicable legal and regulatory requirements, but also with all ethical rules and good practices, including human rights, health and safety, as well as respect for the environment.

Septodont is actively counting on everyone's participation and engagement to promote the Code of Ethics.

Karim Khadr
CEO



Introduction and Scope

This Code of Ethics covers all activities and business practices conducted by Septodont. Its purpose is to establish the principles and guidelines in terms of ethics to guide the actions of all employees, directors and managers of the Group. The Code of Ethics applies to all Group entities and subsidiaries, as well as entities (including joint ventures) controlled by the Group.

The Executive Committee members are fully committed to respecting the Code of Ethics by ensuring that its principles are brought to life throughout the Group on a daily basis. It is also our responsibility to lead by example on the strict applicability of all of its principles.

The principles and rules set forth by the Code of Ethics must be known and applied by all employees, directors and managers of the Group, who are required to act in compliance with the principles it promotes.

Our employees are on the front line in the spreading of our culture in the whole company. Because they are the first ambassadors of Septodont, we are committed to raising awareness among them so they can achieve the highest ethical standards. This is why Septodont undertakes to train its employees to ensure their good knowledge of the Code of Ethics.

This new version of the Code of Ethics has been prepared and revised within the context of Septodont's compliance plan implemented by the Executive Committee to take into account new best practices, as well as the evolving laws and regulations applicable to Septodont. It shall replace all former versions thereof (and, in particular, it supersedes and replaces Septodont's Code of Business Conduct and Ethics dated 10 April 2020).

The Code is not intended to provide an exhaustive list of the rules that govern the activities of the Group and its employees. It contains the core principles that shall guide all decisions at all levels of the organization. This Code must also be complemented by the various policies, procedures, and instructions in force within the Septodont Group, which must be known and applied by the Group's employees.

The Code of Ethics also applies to external stakeholders worldwide, setting forth our expectations regarding their behavior and ethical standards. More specifically, all external stakeholders are expected to apply standards equivalent to those contained in this Code of Ethics including strict adherence to ethics and all the protective requirements of human rights and environment. Business partners (including distributors, intermediaries, agents, contract manufacturing clients, subcontractors, joint-venture partners and suppliers) are specifically required to commit to and abide by the principles established in this Code of Ethics.

Article 1

Compliance with Laws and Regulations

Employees, directors and officers must follow applicable laws, rules and regulations at all times. Septodont expects that all employees will comply with the Code of Ethics and its principles and rules, except where different requirements are mandated by local laws. If a law or regulation conflicts with any provisions of the Code of Ethics, the more stringent standard must be complied with.

Each Septodont entity and affiliate is responsible for ensuring that the rules set out in this Code are effectively applied in the course of their activities.

All Group employees, directors and officers are expected to behave irreproachably in terms of ethics, and the Group applies a **zero-tolerance policy** regarding conducts contrary to this Code or contrary to any laws or regulations applicable to Septodont.

Employees with questions about the applicability or interpretation of any law, rule or regulation, should contact the Group General Counsel.



Article 2

Respect for Human Rights

The Group's ethical principles in conducting business aim to respect all applicable regulations and main international reference texts on human rights and fundamental freedoms, particularly on child labor and forced labor, health and safety, working conditions, and discrimination. The Group commitment to uphold human rights also covers the Group's supply chain, to ensure that we do not contribute to negative impacts on the communities concerned.

We are strongly committed to protect human rights and promote the fair and respectful treatments of all Group employees, as well as all individuals involved in our supply chain.

As a socially responsible employer, Septodont also makes the well-being and safety of its employees a priority, while upholding social rights and fostering dialogue with employees. We carry out safety programs and continuously strive to improve them in order to offer a healthy working environment to all employees. Septodont conducts all operations with the highest regard for the safety of all employees.

As an equal opportunity employer, Septodont encourages diversity and inclusion in the workplace and wants every employee to feel valued and respected. Our employment and professional development decisions are made without regard to color, age, race, religion, sexual orientation, gender, or disability.

Septodont is committed to fostering a work environment in which all individuals are treated with dignity and respect. The diversity of the Group's employees is a huge asset.

Septodont, concerned with and respectful of human rights, does not tolerate any kind of harassment, discrimination, violence, intimidation, bullying or humiliating behavior, whether psychological, sexual or relating to the abuse of power. It is everyone's responsibility not to behave in a way that could harm the dignity and rights of others. We consider that diversity constitutes human wealth promoting creativity and innovation, and therefore economic performance. We also strive to develop an inclusive approach in which all differences are taken into consideration.

Septodont expects its professional partners to pay the same attention to compliance with the rules governing the labor rights, safety and health of their employees.

Article 3

Corporate Social Responsibility

Corporate social responsibility is an integral part of how we do business at Septodont. The Group's social responsibility is based on four pillars through which we cultivate trust by ethical behavior, we care for our people, we preserve nature and we nurture solidarity.

1. Focus on environmental protection

Environmental protection is a key strategic priority for the Group. We are committed to fight against global warming across a low-carbon transition, to preserve water and to protect biodiversity.

To ensure Septodont's efforts match the environmental stakes, the Group has implemented a voluntarist and holistic approach which relies on robust, quantitative data and complies with internationally recognized frameworks and standards.

From an operational standpoint, we ensure compliance with all applicable regulations in the countries where we operate and strive to minimize the negative environmental impact of our sites and activities. We have built clear action plans to continuously improve our environmental performance and achieve our targets.

Septodont expects all of its business partners to share the same commitments in term of environmental protection.

We regularly communicate on our environmental performance with a constant concern for sincerity and transparency and ban all forms of greenwashing.

In addition to its environmental impact mitigation plan, Septodont is also working on an adaptation plan regarding the environmental crisis and associated risks.

We recognize the importance of protecting the environment and strive to minimize our impact as we contribute to the development of the territories in which we operate.

As part of our commitment to promote economic development and value creation while fostering sustainability, Septodont regularly liaises with its business partners to, inter alia, improve sustainability performance and reduce the environmental impact of its products and activities.

2. Focus on philanthropy

Concerning philanthropy, Septodont created its foundation which has a triple vocation: facilitate access to dental care for the most disadvantaged populations throughout the world, establish partnerships on social, educational, cultural and professional integration initiatives in territories where we are established and finally helping vulnerable populations during humanitarian disasters.



Article 4

Transparency and Integrity in Collaboration with Healthcare Professionals

In our activity, the Group engages with healthcare professionals and related entities (companies or individuals) around the world with the aim of obtaining their expertise and advices, which are essential to advancing medical knowledge, developing innovative products, as well as promoting the appropriate use of our solutions and conducting clinical or research studies.

We carefully select the partners and suppliers we work with, taking into consideration environmental, social and ethical principles. We manage our business in compliance with the regulatory requirements of the countries where the health care professional and we operate.

These services provided by healthcare professionals must always serve the legitimate purpose of advancing our mission in the interests of the patients. Compensation for these services is based on fair market value and reflects the nature and scope of the work performed.

Septodont is dedicated to transforming ideas into innovative registered products. To achieve this, we conduct pre-clinical or clinical trials in strict adherence to applicable laws and Good Laboratory/ Clinical Practices (GLP/GCP) standards, ensuring that our research is carried out responsibly, transparently and with respect to human dignity and safety.

The Group promotes transparent relations with healthcare professionals. Under various applicable laws and requirements, the Group must disclose engagements, payments and other transfers of value to healthcare professionals.



Article 5

Anti-Corruption

The Group is fully committed to complying with all national and international anti-corruption laws wherever it conducts business. All acts of corruption or influence peddling, in any form, are strictly forbidden and will not be tolerated by the Group.

1. Definitions of the offences of corruption and influence peddling

"Corruption" is an act by which a person occupying a specific function in the public or private sector, solicits or accepts, promises or offers, directly or indirectly, something of value to obtain an undue advantage.

Corruption can be either "public", when it involves a "public official" (e.g., elected representatives, magistrates, officials or any person who holds a function at a government, a government department, a public authority, a state-owned or controlled company, a political organization, a public entity), or "private" when it only involves people who are not related to public functions.

- **"Active corruption"** is the act of promising or offering to a public official or a private person, whether solicited or not, directly or indirectly, any undue advantage, for himself or a third party, in order that this person performs, delays or abstains from performing an act within the scope of his/her duties.
- **"Passive corruption"** consists of a person exercising a public or private function, taking advantage of his functions by soliciting or accepting gifts, promises or advantages with a view to accomplishing, delaying or abstaining from accomplishing an act pertaining to his/her function.

"Influence peddling" means a person holding public authority, charged with a public service mission or vested with a public elected office trading on his/her position or influence, real or supposed, to influence a decision that will be taken by a third party.



The following examples illustrate situations in which employees of the Septodont Group could find themselves that could reveal a case of corruption or influence peddling. These situations are unacceptable and are as such prohibited:

- Accepting gifts or hospitality from a supplier participating in a call for tender that can affect the impartiality of the selection process;
- Offering an undue benefit to a client to secure a contract with the Group;
- Accepting a request for facilitation payments from a public official in charge of an administrative procedure involving the Group;
- Making a donation to an entity that is ultimately owned by a public official in order to influence a decision to the benefit of the Group.

An “undue benefit” can take various forms and cover anything of value even in non-monetary form, in particular:

- A sum of money, in cash or on any other support (e.g., gift card, discount, reimbursements);
- Free services rendered;
- Hospitality and gifts;
- An internship or a job position;
- A confidential business information;
- A contract or a mandate.



2. Expected behaviors of all employees, directors and officers of the Group

As stated above, the Group's policy is to conduct all of its business in an honest and ethical manner. Septodont has a zero-tolerance policy towards corruption and is committed to acting professionally, fairly and with integrity in all its business dealings. Employees, directors and officers of Septodont must never offer undue benefit that may qualify as corruption or influence peddling.

The Group has adopted a specific compliance program to meet these standards and mitigate any identified risks. In this respect, Septodont conducts regular assessments of the risks of corruption and influence peddling pertaining to its operations to ensure that these are properly identified and mitigated.

The risk of corruption is particularly heightened when employees, directors or officers have to interact with public officials. Acting transparently towards public officials is fundamental to maintaining the integrity and credibility of our organization. Transparency helps ensure that all interactions with government representatives are lawful, ethical, and free from any appearance of impropriety or undue influence. It also supports compliance with anti-corruption laws and reinforces public trust in both our operations and the institutions we engage with.

Risks of corruption also arise from the use of third parties. When selecting business partners (for example, a subcontractor, a supplier or a distributor), it is essential to ensure they uphold the same ethical standards and values that define our Group. Collaborating with partners who share our commitment to integrity, transparency, and responsible business practices helps safeguard our reputation, mitigate risk, and promote long-term, sustainable success. By aligning with ethically responsible organizations, we foster a culture of accountability and trust that benefits our stakeholders and reinforces our dedication to doing business the right way.

Employees involved in partner selection are expected to conduct appropriate due diligence and prioritize ethical alignment in their decision-making process, and to ensure that the remuneration is due in exchange of a real need and is proportionate to the services provided. For example, the use of a third party and related payments must not conceal kickbacks paid to a decision-maker in order to obtain or retain business.

Facilitation payments

Facilitation payments typically refer to small payments or gifts made to officials to obtain a service to which the requestor is legally entitled, for instance to speed up administrative processes, obtain a visa, permit, license or service such as installing a telephone line, clearing customs duties or other basic services.

These payments are strictly prohibited and, when requested, must always be refused. For example, an unofficial payment requested by a representative of a government agency to expedite the issuance of an authorization should be refused, as it may constitute an act of corruption.

When facing this situation, explain to the requestor that the Septodont's rules of ethics do not allow you to grant the request and that such action could constitute an offence (which is the case in the great majority of countries), and report the case to your hierarchy.

Gifts, hospitality and events

The Group is committed to the fight against corruption, influence peddling and conflicts of interest. This commitment is reflected in particular by the strict framework put in place with regard to gifts, hospitality and events.

Relevant expenses must be reasonable and appropriate to the occasion or circumstances, made openly and transparently, as well as properly recorded in our books and records. Moreover, Group employees, their family members, or agents are allowed to offer or accept gifts or hospitality only if such benefits: (i) are not cash, (ii) follow business customs, (iii) are not made with corrupt intent, and (iv) are in full compliance with applicable laws.

The granting and the receiving of gifts and invitations must, in any case, comply with other applicable regulations and internal procedures.

Employees, directors or officers who are conducting business with any government officials must always contact the Group Quality, Regulatory & Medical Department and the Group Legal Department prior to offering gifts and hospitality to governmental officials.

In the event of any doubt about compliance of a contemplated gift, hospitality or business entertainment expense, please address your request to the Group Quality, Regulatory & Medical Department and the Group General Counsel.

Charitable donations and sponsorships

Any contribution, whether defined as corporate philanthropy or sponsorship, may turn into a risk factor for the entity concerned and the Group.

Patronage is an act of philanthropy and disinterested defined as material support provided, without direct compensation from the beneficiary to a work or a person for the exercise of activities of general interest.

Sponsorship designates a commercial operation in the context of which the company makes a payment to associate its name with an activity, an event or any other organization - in the fields of sport, culture, the environment, for example - and receives, in return, rights and benefits such as use of the name of the sponsored organization, advertising credits in the media, for events and in publications, the use of facilities and opportunities to promote its name, products and services. In other words, it is the financial or material support given to an event or a person in exchange for different forms of visibility.

Special vigilance must be exercised when providing financial or material support to a non-profit organization or to sponsored activity. Patronage and sponsorship operations must never be made with a corrupt intent, shall be consistent with Septodont's values and policies and procedures, and must be properly and accurately reflected and recorded in our books and records.

If a decision-making person in a tendering process asks you to donate a certain amount of money to a charitable organization he/she is presiding in order to secure the contract, you must not cede to this solicitation.

In any case, if you have any questions or concerns, please ask your management line or the Group General Counsel.



INTEGRITY

Article 6

Avoiding Conflicts of Interest

In performing their job duties, employees, directors or officers are expected to use their judgment to act, at all times and in all ways, in the best interests of the Group.

There is a conflict of interest when a personal or private interest of the employee, director or officer – family, financial or professional for example – can influence or simply appear to influence the performance of a professional duty of the employee, director or officer.

This “interest”, which must be understood broadly, must therefore not be of such a nature as to influence the independent, impartial and objective exercise of the functions of the employee within Septodont.

A conflict of interest can occur on all levels of governance and in all areas of human relationships.

The following situations constitute examples of conflicts of interest: an employee owns shares in a supplier company and pushes to award contracts to that supplier; a director has a close relative who is an owner or investor in a privately-owned business partner of the Group; an employee has close personal relationships influencing the decisions in a bidding process in which he/she is participating; etc.

Additional information and examples are provided in the internal Septodont policy dedicated to prevention of conflicts of interest.

Employees are expected to avoid any action, position or interest that would conflict or appear to conflict with the interests of Septodont. The mere appearance of a conflict of interest can harm the Group. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf, and refrain from taking advantage of any situation, either directly or through a third party, for personal gain.

Employees, directors or officers finding themselves in a situation of potential or actual conflict of interest (or having doubts on such a situation) should report such situation internally in accordance with Septodont’s internal policies and procedures.

All employees, directors or officers must abstain from taking any actions related to any reported actual or potential conflict of interest until the situation has been assessed and resolved internally.

Article 7

Regulations on Embargoes, Sanctions, Export Restrictions, Competition, and Fair Dealing

The Group wishes to be part of a process of fair and honest competition. The Septodont entities and employees must act in compliance with applicable competition and/or antitrust laws. Antitrust law consists of regulations designed to promote and maintain market competition by preventing anti-competitive practices such as agreements (competing companies agree to prevent, restrict or distort competition) or abuse of dominance (imposition of unbalanced obligations by a dominant company).

Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited.

No employee, director or officer should take unfair advantage of anyone through manipulation, hiding, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

The regulatory landscape regarding embargoes (official bans on trade or other commercial activities with a specific country), economic sanctions (restrictive measures against specific entities or individuals), and export restrictions has grown increasingly intricate and stringent. These regulations are now complex, constantly evolving, and often extraterritorial. Violations or attempts to circumvent these rules can result in severe repercussions for the company and its leaders, including substantial fines, imprisonment, and additional penalties such as exclusion from public contracts.

Septodont is committed to full in compliance with all such applicable laws and regulations, ensuring our operations uphold the highest standards of integrity and responsibility. In this respect, among others, Septodont conducts the requisite integrity checks to ensure its business partners are not on sanctions lists.



Article 8

Representation of Interest and Lobbying

Representation of interests can be defined as engaging with public decision-makers to influence legislation, regulations, standards or decisions in a way that promotes Septodont's legitimate interests and enhance its reputation.

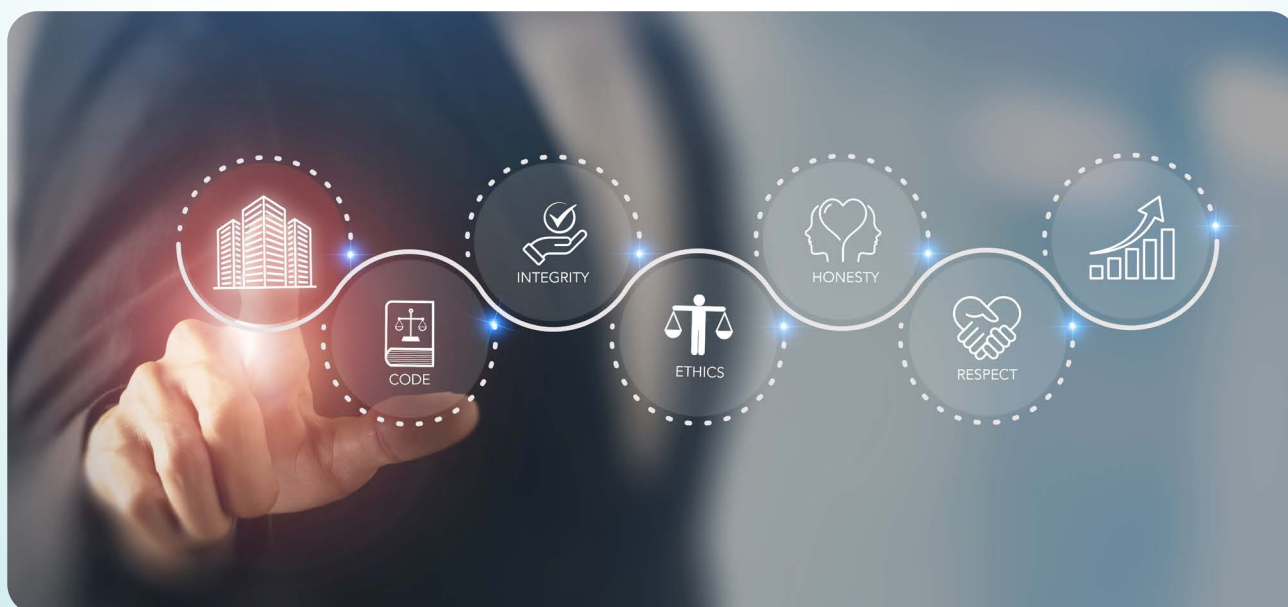
Only designated employees are authorized to carry out lobbying activities on behalf of Septodont. The latter must act with integrity and transparency, clearly identifying their role and affiliation when interacting with public authorities. They must ensure that their actions do not create or appear to create any conflict of interest.

All lobbying efforts must be conducted in full compliance with applicable laws and ethical standards, and always in alignment with Septodont's values of responsibility, transparency, and respect for public institutions.

The key principles of integrity, transparency, and accuracy must guide the Group's participation in the public sphere.

In addition, the use of resources or the granting of donations or financial contributions to support, in any way whatsoever, directly or indirectly, activities or political parties, candidates or political mandates is prohibited.

The participation of an employee in political activities can only be done in a personal capacity, in his own name and outside his working hours. Similarly, the use of Septodont premises or resources to conduct political activities is expressly prohibited.



Article 9

Record-Keeping and Financial Integrity

Septodont only uses company funds for authorized business purposes and ensures that its required disclosures are complete, fair, accurate, timely and understandable.

The Group's books, records, accounts and financial statements must be maintained transparently and in appropriate detail, must properly reflect the Group's transactions and must conform both to applicable law and to the Group's system of internal controls.

Such books and records include all data, certifications and other written materials provided for financial reporting and disclosure purposes.



Article 10

Confidentiality, Proper Use of Group Assets and Data Privacy

Employees, directors and officers must maintain the confidentiality of confidential information entrusted to them by the Group or its customers, except when disclosure is authorized by the Group Legal Department or required by applicable laws or regulations. Confidential information includes all non- public information that might be of use to competitors, or harmful to the Group or its customers, if disclosed. It also includes information that customers and suppliers have entrusted to us. The obligation to preserve confidential information continues even after employment ends.

All employees, directors and officers should endeavor to protect the Group's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Group's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation to the management. Any Group equipment should not be used for non-Group business.

The obligation of employees, directors and officers to protect the Group's assets includes its proprietary information. Proprietary information includes intellectual property such as patents, patent designs, trademarks, copyrights and trade secrets, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Group policy.

The Group undertakes to comply with all laws and regulations relating to data privacy and protection. The Group commits to develop and implement appropriate technical and security measures to protect personal data. Any person has the right to obtain the rectification of inaccurate personal data concerning him or her.



Article 11

Reporting Illegal or Unethical Behavior

Employees should openly speak with anyone in their management chain or the Group Legal Department when they have a question about the application or the implementation of the Code of Ethics or when in doubt about how to properly act in a particular situation.

Septodont strongly encourages employees, directors and officers having personal knowledge that a legal/regulatory provision or any of the rules contained in this Code of Ethics (or other applicable policies and procedures) has not been complied with or is about to be breached, to promptly report the matter to their management chain or the Group General Counsel via the dedicated email address.

The Group is committed to creating an environment that encourages all employees, officers and directors to raise ethical concerns early.

It is therefore possible to use the alert line made available by Septodont. Alerts can be sent to ethics@septodont.com in accordance with the Alert Procedure which supplements this Code of Ethics.

The Group will handle reports in accordance with the conditions and confidentiality guarantees detailed in the said Alert Procedure. When an internal investigation is initiated following an alert, the Group's employees, directors and managers will be asked to cooperate in the context of these investigations.

Septodont is committed to taking all appropriate measures to protect individuals submitting a report in good faith, as well as the individuals who assisted them. In any case, the Group does not allow retaliation against any person for having made a report in accordance with the alert procedure.

External business partners, as well as their employees, directors and officers, are also invited to report any suspicions of behavior contrary to the Group's ethical principles or applicable legal provisions which they may have witnessed.



Article 12

Disciplinary Sanctions

Any violation of the rules and principles set out in this Code of Ethics is a serious matter which may affect the reputation of Septodont as it can have important legal (both criminal and civil) and financial consequences. The Septodont Group is committed to taking prompt and consistent action against any potential violations of the Code of Ethics.

As such, any violation of a provision of this Code of Ethics may give rise, if proven, to disciplinary sanctions which may go as far as dismissal, under the conditions provided for by the regulations, policies or procedures of the entity to which the Group employee belongs. The sanctions will be those established under applicable law, in full compliance with the rights and guarantees applicable to the employee concerned.

These possible disciplinary sanctions will be imposed without prejudice to any legal action that may be launched by Septodont.

Those who violate the standards in the Code of Ethics will be subject to disciplinary sanctions, up to and including termination of employment in accordance with Septodont's internal processes, and applicable regulations.

Adequate remedial actions (up to the termination of the relevant commercial relationship) will also be taken against any business partners found to have engaged in unethical behavior.



Article 13

Open Dialogue with Employees

Septodont has an “open-door” policy and employees can freely approach the Group Legal Department with questions, concerns or suggestions they may have about the Code of Ethics and the situations it covers.

No concern is too small, and asking questions helps prevent misunderstandings and potential misconduct. Septodont is committed to ensuring that everyone feels safe and supported when bringing forward issues, without fear of retaliation or judgment.



