



Align Technology Switzerland GmbH

Statement of Commitment on Human Rights

for the Fiscal Year 2024

This is the second modern slavery statement (“**Statement**”) made by Align Technology Switzerland GmbH (collectively “**Align Switzerland**” or “**Company**”) for the Fiscal Year 2024 (“**Fiscal Year**”) to adhere to the new Articles 964j and following of the Swiss Code of Obligation and the respective Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor (DDTrO).

Align Switzerland’s ultimate parent company, Align Technology, Inc. (“**Align**”, “**we**” or “**our**”), is listed on the NASDAQ Global Market under the ticker symbol “ALGN” and its global headquarters are in Tempe, Arizona USA. Align designs, manufacturers, and sells the Invisalign System of clear aligners, iTero™ intraoral scanners, exocad™ CAD/CAM software for digital orthodontics and restorative dentistry among other products and services through Align and its affiliated companies, including Align Switzerland.

Align Switzerland is a wholly owned direct subsidiary of Align and has 11 direct subsidiaries and 38 indirect subsidiaries through Align Technology B.V. in the Netherlands and mertus 602. GmbH in Germany. Align, directly and through its affiliated entities globally, markets, distributes, and services Align products and services. As at the date of this statement, there were less than 250 employees at Align Switzerland on an annual average basis.

Align Switzerland procures the products it sells entirely from affiliated entities in Align’s global supply chain. Products sold all over the world are manufactured in various locations, including China, Mexico, Israel and Poland. Align Switzerland also has local suppliers in relation to owned and leased real property, digital, marketing, insurance, professional services, distribution and logistics, human resources, office supplies, cleaning and travel.

To adhere to the California Transparency Supply Chain Act (2010), the Modern Slavery Act 2015 (UK), the Australian Modern Slavery Act 2018, and the Swiss DDTrO Align has conducted numerous reviews of its labor practices and those of its suppliers and Align Switzerland didn’t find any reasonable suspicion of child labor in

its first statement for the fiscal year 2023. As such, Align Switzerland was therefore exempt from further due diligence and reporting obligations pursuant to Art. 5 DDTro.

Nevertheless, Align Switzerland adheres to internationally recognized regulations listed in Annex 2 of the DDTro, especially (i) ILO Conventions Nos 138 and 182 and the ILO-IOE Child Labor Guidance Tool for Business of 15 December 2015, and (ii) the UN Guiding Principles on Business and Human Rights.

1. Subject matter and objective

The objective of this Statement of Commitment is to provide a common framework for Align Switzerland's responsibility to respect human rights globally for all its business activities and partnerships.

This Statement of Commitment clarifies:

- the relevant international human rights frameworks that the Company subscribes to
- the Company's salient human rights issues
- the Company's human rights due diligence framework describing the appropriate policies and processes that implement its human rights commitment.

2. Purpose

As stated in Align's Global Code of Conduct, Align Switzerland supports and respects the protection of internationally proclaimed human rights and labor standards. The Company fully respects the personal dignity, privacy and individual rights of its employees and contractors as well as the employees of its customers, suppliers, and other stakeholders.

Align Switzerland aspires to play a leading role in responsible business conduct. Respecting human rights is an integral part of responsible business and is foundation for our corporate culture and credibility. Align Switzerland is committed to maintaining the trust of all our stakeholders by treating people respectfully and with dignity.

All companies have an impact on human rights: either directly through their operations or via the businesses with whom they choose to associate as suppliers or customers. For Align Switzerland, respecting human rights means continuously making business decisions that contribute to upholding and not infringing human rights.

3. Framework of Reference

Align Switzerland is committed to high standards of business ethics and integrity, including the support and respect of internationally proclaimed human rights and labor standards as outlined in international human rights frameworks such as:

- Universal Declaration of Human Rights (UDHR)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- ILO Core Labour Conventions
- ILO Conventions on child Labor No 138 and 139,
- ILO Conventions on child Labor No 182,
- ILO-IOE Child Labor Guidance Tool for Business
- Ten Principles of the UN Global Compact (UNGC)

Align Switzerland complies with the laws and regulations in the markets it operates. Where local laws are less stringent than our policies and the above named internationally recognized human rights and employment standards, Align Switzerland applies the more stringent policies and standards and encourages its suppliers and business partners to do the same.

4. Focus and human rights issues

Align Switzerland is committed to respecting internationally recognized standards of human rights and does not attribute more importance to one human right over another. However, for the implementation of its human rights commitment, Align Switzerland prioritizes human rights issues most salient to its business – identified via a formal human rights saliency assessment conducted in accordance with the UNGPs.

Among the broader human rights issues identified along the value chain, Align Switzerland is committed to focusing on the following human rights issues:

- health and safety;
- environmental impact (e.g., water pollution, dust and other emissions, hazardous materials);
- working conditions in our operations and throughout our supply chain;
- discrimination and harassment.

In prioritizing these issues, Align Switzerland recognizes that for certain groups negative human rights impacts may be particularly severe due to their vulnerability or marginalization. Align Switzerland recognizes that the evaluation of the severity of potential impacts may change and that other issues may grow in importance over time. It therefore regularly reevaluates the salient issues based on further assessments and regular dialogues with internal and external stakeholders.

5. Policy Commitment

As outlined in this Statement, Align Switzerland recognizes the important role it has in respecting human rights, in line with the “Protect, Respect, Remedy” framework provided by the UNGPs, which defines:

- the stated duty to **protect** against human rights abuses by third parties, including business;
- the corporate responsibility to **respect** human rights; and
- greater access by victims to effective **remedy**, both judicial and non-judicial.

Align Switzerland’s commitment to respect human rights also extends to all individuals throughout the value chain, and Align Switzerland uses its relationships with independent suppliers and other business partners to encourage and promote the principles of this Statement throughout its network.

6. Assess actual and potential impacts

Align Switzerland identified its most salient human rights issues in accordance with the UNGPs and will regularly re-assess its human rights risks based on internal and external stakeholder feedback and expert judgments, recognizing that the human rights issues currently deemed the most salient may change over time.

Through this process, Align Switzerland focuses on proactive stakeholder engagement as a tool to identify and mitigate potential risks and develop positive opportunities for impacted individuals.

Salient issues and expected high risk areas may be assessed in more detail through in-depth human rights risk assessments and other means to identify appropriate measures.

7. Integrate findings & take appropriate action

Based on the human rights-related risks and impacts identified, Align Switzerland develops prevention and mitigation measures integrated into its operations, training programs, policies, and management systems. This is achieved through the development and implementation of action plans approved by the Executive Management. The roadmap assigns clear responsibilities to related initiatives and is monitored, updated, and revised annually.

8. Track & communicate performance

Align Switzerland pursues the effectiveness of its actions and influence to ensure human rights are respected in its value chain through a system with clearly defined targets and key performance indicators

monitoring the implementation of its human rights action plans. Where possible, Align Switzerland strives to measure the actual impacts of its actions on human rights.

9. Remediate adverse impacts

Align Switzerland attaches great importance to an open corporate culture, where every employee is encouraged to speak up if they become aware of compliance risks. This includes human rights issues. Grievance mechanisms are vital for workers to be able to raise issues. As part of our commitment to honest and ethical behaviour, we have a Speak Up Policy through which we ask all employees to report any actual or apparent violations of law, conduct that is inconsistent with our Code, applicable policies and procedures or ethical standards so that they can be investigated and dealt with appropriately. Align Switzerland has an open-door policy and encourages all employees to present ideas, raise concerns, and ask questions – especially those of a legal or ethical nature. Everyone on the management team is responsible for supporting our open-door policy and for welcoming direct reports or other employees who may reach out to them for assistance. Align Switzerland encourages all team members to utilise the Speak Up mechanisms, including an online portal to help facilitate anonymous reporting, or confidential conversations with their managers, Compliance and Ethics Office, HR, or Legal to raise concerns. Align Switzerland does not retaliate or permit retaliation against anyone who raises questions or concerns in good faith about corporate activities. Align Switzerland is committed to investigating these issues thoroughly and providing appropriate responses and remedies.

When adverse human rights impacts are uncovered, Align Switzerland is committed to taking timely and transparent action to remediate abuses or violations in a fair and equitable manner in line with the UNGPs. Where Align Switzerland finds impacts directly linked to its business relationships, it will use its influence to encourage suppliers and business partners to respect human rights, whether through corrective action plans or termination as appropriate under the circumstances.

10. Validity

This Statement is effective as of January 1, 2024. It will be reviewed periodically and updated as required to comply with applicable changes in our business and regulatory requirements.

11. Responsibility

All questions related to this Statement should be addressed to the following e-mail address:

compliancehelp@aligntech.com

12. Communication and Implementation

This Statement is available on Align Switzerland's corporate website for the Company's external stakeholders, suppliers, and business partners. It is also made available on the Company's internal communication channels. Furthermore, every manager must ensure that Align Switzerland employees become aware of this Statement, understand it, and adhere to it.



Align Technology Switzerland GmbH
Simon Beard
President of the Management
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