

Align Technology Switzerland GmbH

**Statement on Due Diligence and Transparency in
relation to Minerals and Metals from Conflict-
Affected Areas and Child Labor**

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About this Statement.

Switzerland amended its Code of Obligation as of January 1, 2022, re due diligence and transparency in relation to minerals and metals from conflict-affected areas and child labor (Art. 964j CO). Undertakings whose seat, head office or principal place of business is in Switzerland must comply with obligations of due diligence in the supply chain and report thereon if:

1. they place in free circulation or process in Switzerland minerals containing tin, tantalum, tungsten or gold or metals from conflict-affected and high-risk areas; or
2. they offer products or services in relation to which there is a reasonable suspicion that they have been manufactured or provided using child labor.

This statement made by Align Technology Switzerland GmbH (collectively “**Align Technology Switzerland**” or “**we**” or “**our**”) is prepared in accordance with 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 Labour (DDTrO).

Our Commitment.

Our commitment to human rights is set out in our Align Technology’s Global Code of Conduct.

We are committed to making our purposes, “transforming lives and changing smiles”, evident in every part of our business, from the way we source our materials, to the products we create, to the services we provide, to the interactions we have with our customers, employees, and communities. Respecting human rights, supporting equality, providing fair and equal wages, and creating a safe place to work – and ensuring our suppliers and their suppliers to do the same – are some of the ways in which we can achieve our purpose.

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 labour and employment laws. We use our due diligence processes and our contracts to make sure recruiters, suppliers, or any business partners we work with comply with fair labour laws and are not using forced labour or child labour. We are alert to situations that may suggest a business partner is using child labour and forced labour and will respond quickly to address any human rights concerns such as identity or immigration documents being taken, or individuals being prohibited from returning to their home country.

Align implemented the Align Technology’s Intermediary Due Diligence Policy with strict vendor onboarding and monitoring procedures and a Speak Up Policy.

Our business structure.

a. Our ultimate parent company, Align Technology, Inc.

Align Technology Switzerland’s ultimate parent company, Align Technology, Inc. (“Align Technology Inc.”) is a global medical device company primarily engaged in the design, manufacture, and marketing of Invisalign® clear aligners, iTero™ intraoral scanners and services for dentistry, exocad™ computer-aided design and computer-aided manufacturing (“CAD/CAM”) software for dental laboratories and dental

practitioners and dentalXrai™ software a dental diagnostic assistance system that helps dentists to analyze dental X-rays. We also market and sell consumer products that are complementary to our doctor-prescribed principal products under the Invisalign and other brands, including retainers, aligner cases (clamshells), teeth whitening products and cleaning solutions (crystals, foam, and other material) (collectively “Consumer Products”). Our primary goals are to establish clear aligners as the principal solution for the treatment of malocclusions, or the misalignment of teeth, and our Invisalign system as the treatment solution of choice by orthodontists, general dental practitioners, and patients globally, our intraoral scanners as the preferred scanning technology for digital dental scans, and our exocad CAD/CAM software as the solution of choice for dental labs. Align Technology Inc. is listed on the NASDAQ Global Market under the ticker symbol “ALGN” and its global headquarters are located in Tempe, Arizona, USA. During the Reporting Period, Align Technology Inc. offered the following main products and services: the Invisalign clear aligners, iTero intraoral scanners, exocad software, dentalXrai software and Consumer Products.

b. Align Technology Switzerland GmbH

Align Technology Switzerland GmbH is a wholly owned indirect subsidiary of Align Technology Inc. (together with its subsidiaries, “Align”) and has eleven direct subsidiaries and thirty-seven indirect subsidiaries (“Align Technology Switzerland Group”) whose operations are to market, distribute and service Align products and services within the whole world.

Our business operations and supply chain.

Our purpose is “transforming lives and changing smiles”. As of the end of the Reporting Period, over 16 million people worldwide have chosen to straighten their teeth with Invisalign clear aligners¹.

Align Technology Switzerland Group procures the products it sells entirely from related entities in Align Technology Inc.’s global supply chain. Products sold worldwide are manufactured in various locations around the world including China, Mexico, Israel, and Poland. These Align entities itself source products and services from third parties. Align Technology Switzerland Group also has local vendors in relation to property, digital, marketing, insurance, professional services, distribution and logistics, human resources, office supplies, cleaning, travel, and other services.

Understanding our risks.

a. Conflict minerals

Align Technology fully support the goals and objectives of Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act, which aims to reduce violent conflict in the Democratic Republic of the Congo and certain adjoining countries and implemented a respective Policy on Conflict Minerals. A copy of the Policy can be found here: <http://investor.aligntech.com/corporate-gov>.

Align Technology Inc. prepares a report every year in accordance with Rule 13p-1 under the Securities Exchange Act 1934, the first time for the reporting period from January 1 to December 31, 2022.

¹ Data on file, Align Technology, Inc. 31 October 2023.

Regarding conflict minerals, Align Technology Switzerland GmbH checks and reports on an annual basis whether it falls under the due diligence and transparency obligations based on the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor (DDTrO).

b. Modern slavery and child labor

The sectors or industries that Align Technology and its affiliated entities operate in or uses continue to be considered as having a higher prevalence or risk of modern slavery practices due to their characteristics, processes, and products²:

- a. manufacturing;
- b. electronics;
- c. catering, cleaning, and logistics; and
- d. travel management services.

Regarding child labor, Align Technology Switzerland GmbH checks and reports on an annual basis whether it falls under the due diligence and transparency obligations based on the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labor (DDTrO).

Rotkreuz, December 2023

² According to (i) the ACSI Modern Slavery Risks, Rights & Responsibilities (<https://acsi.org.au/research-reports/modern-slavery-risks-rights-and-responsibilities/>). This is a research report that contains valuable tools for companies and investors in addressing modern slavery risks and identifies five ASX200 sectors considered to be high risk for modern slavery; and (ii) the International Labor Organization's 2017 Global Estimates of Modern Slavery: Forced Labour and Forced Marriage (https://www.ilo.org/global/publications/books/WCMS_575479/lang-en/index.htm).