

**Align Australia Group**

# **Modern Slavery Statement**

**Financial Year 2025**

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## About this Statement.



This Modern Slavery Statement ("**Statement**") is a joint statement from the below listed entities (collectively "**Align Australia Group**", "**we**" or "**our**") prepared in accordance with section 14 of the Modern Slavery Act 2018 (*Cth*) in respect of our financial year running 1 January 2025 to 31 December 2025 (the "**Reporting Period**"). It outlines the steps the Align Australia Group has taken to identify and address the risks of modern slavery in its operations and supply chain, and to mitigate risks and assess the effectiveness of our actions.

This Statement is our fifth modern slavery statement.

| Legal Name                               | Reference Name                 | Australian Company Number | Jurisdiction |
|------------------------------------------|--------------------------------|---------------------------|--------------|
| Align Technology (Australia) Pty Limited | "Align Technology (Australia)" | 163 076 971               | Australia    |
| ICA Holdings Pty Ltd                     | "ICA Holdings"                 | 143 532 405               | Australia    |
| Invisalign Australia Pty Limited         | "Invisalign Australia"         | 098 357 736               | Australia    |

## Align business structure.



The ultimate parent company of the Align Australia Group is Align Technology, Inc ("**Align Technology**"). Align Technology is listed on the NASDAQ Global Market under the ticker "symbol "ALGN" and its global headquarters are in Tempe, Arizona USA. Align Technology designs, manufacturers, and sells the Invisalign® System of clear aligners, Vivera™ retainers, iTero™ intraoral scanners, exocad™ CAD/CAM software and dentalXrai software<sup>1</sup> for digital orthodontics and restorative dentistry among other products and services through Align Technology and its affiliated companies. Align Technology also markets and sells consumer products that are complementary to Align Technology's doctor-prescribed principal products under the Invisalign and other brands, including, among other things, aligner cases (clamshells), Invisalign Lens, and cleaning solutions (crystals, foam, and other material) (collectively "**Consumer Products**").

Align Technology's 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 for orthodontic and restorative dentistry, and our exocad CAD/CAM software as the solution of choice for dental labs. During the Reporting Period, Align Technology offered the following main products and services: Invisalign clear aligners, Vivera retainers, iTero intraoral scanners, exocad software, dentalXrai software<sup>1</sup> and Consumer Products. To date, over 22 million people worldwide have been treated with the Invisalign system.

Align Technology (Australia) is a wholly owned indirect subsidiary of Align Technology (together with its subsidiaries) and has six () subsidiaries including ICA Holdings and Invisalign Australia whose operations are to market, distribute and service Align products and services within Australia and New Zealand. The subsidiaries of Align Australia Group are located in Australia, New Zealand, China, Hong Kong and Singapore, respectively, and are either holding companies or distribution entities for each applicable jurisdiction. In 2023, a new entity, Chengdu Jinjiang AiXiaoYing Dental Clinic Co., Ltd. was incorporated in China and forms part of the Align Australia Group. We can now report that this entity is now operational, providing Invisalign clear aligner treatment to our employees as welfare.

## Our business operations and supply chain.



Our purpose is "transforming smiles, changing lives". The Align Australia Group procures the products it sells entirely from related entities in Align Technology's global supply chain. Products sold in Australia and New Zealand are manufactured in various locations around the world including the United States, China, Mexico, Germany, Pakistan and Israel. The Align Australia Group also has local vendors supportive of its services function including in relation to property, digital marketing, insurance, professional services, human resources, office supplies, cleaning, travel, and other services.

As at the end of the Reporting Period:

- Under 100 employees were employed full-time, 3 were employed part-time, 5 on a full-time fixed term contract and 1 on a part-time fixed term contract in Australia where Invisalign Australia Pty Limited operates 1 office and 1 training centre in

<sup>1</sup> During the FY2025 reporting period, dentalXrai software was not sold into Australia or New Zealand.

Sydney, NSW;

- b. Under 10 employees were employed full-time in New Zealand where the Align Australia Group does not operate any physical premises;
- c. Over 130 employees were employed full-time in Singapore where ICA Ortho Services Pte Ltd operates 1 office;
- d. Over 30 employees were employed full-time in Hong Kong where Invisalign Hong Kong Limited operates 1 office; and
- e. 2 employees were employed in China where Chengdu Jinjiang AiXiaoYing Dental Clinic Co., Ltd. operates 1 premise. The entity is operational now, providing Invisalign clear aligner treatment to our employees as welfare.

## Understanding our modern slavery risk.



The Align Australia Group continues to operate as an integrated group of companies with consistent policies, systems and approaches applying to each entity.

The Align Australia Group has taken a risk-based approach to evaluate the likelihood of modern slavery existing in our operations and supply chain, including by sector and industry, by the type of products and services and by geographical location. We believe the risk of modern slavery in our operations is **medium** or **low** depending on the category. As with any company, there may be an unknown and latent risk of modern slavery practices through hidden or disguised activities of our employees, vendors, and their supply chains.

We have assessed that the overall risk of the Align Australia Group's operations causing or contributing to modern slavery through our business practices as **low**. This analysis reflects our assessments of key supply chain categories, as set out below, as well as series of mitigation strategies that are particularized later in this Report.

### Geography

The Align Australia Group currently operates in Australia and New Zealand either directly or indirectly through distributors. Pursuant to the 2023 Global Slavery Index released by Walk Free <https://www.walkfree.org/resources/> as a guide, "Australia is among the least vulnerable countries to modern slavery in the Asia Pacific region and globally" and "New Zealand is among the countries with the lowest prevalence both in the region and globally of modern slavery."

### Sectors and industry

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

- a. Manufacturing;
- b. Electronics;
- c. Catering, cleaning and logistics; and
- d. Travel management services.

The following categories of our products and services have been used to help identify and address modern slavery risks within the Align Australia Group's operations and supply chains.

| Main supply chain category                                                                                           | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Risk rating   |
|----------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Manufacturing facilities – Invisalign clear aligners, Invisalign Palatal Expander System and Vivera retainers</b> | <p>Invisalign clear aligners, the Invisalign Palatal Expander System and Vivera retainers, sold by the Align Australia Group directly to Australian and New Zealand doctors, are manufactured in Align Group facilities in Mexico and China.</p> <p>Our digital treatment planning facilities are located worldwide. For Australia and New Zealand, these services are supported by our team located in Costa Rica and Mexico (clinical specialists and CAD designers).</p> <p>All manufacturing and treatment planning facilities are directly operated and managed by Align Technology through its affiliates in each relevant country. This direct organizational relationship helps mitigate the risk of modern slavery. Employees who work at Align's facilities are provided working, employment, and recruitment conditions in compliance with our quality standards. They also have access to the policies and training particularised in this report and, importantly, are encouraged to raise good faith concerns by speaking up through our Global Speak Up Policy without fear of being subjected to retaliation.</p> | <b>Low</b>    |
| <b>iTero intraoral scanners</b>                                                                                      | <p>We produce our handheld intraoral scanner wand, perform final scanner assembly, and repair our scanners for Australia and New Zealand at our facilities in Israel, and service and repair certain scanners in Israel and Singapore.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Medium</b> |

| Main supply chain category           | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Risk rating |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
|                                      | The facilities in which these activities are performed are all directly operated and managed by the Align Group.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |             |
| exocad CAD/CAM software              | Our exocad software developed and manufactured in Germany is licensed and made available on a dongle manufactured in China and sold through authorised resellers in Australia.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Low         |
| Ancillary products                   | <p>The Align Australia Group also sells ancillary products directly to Australian doctors such as aligner seaters, cheek retractors, cleaning crystals, clamshells, dental pliers kits, PVS trays, professional whitening gel, Invisalign Stickables, assembly kits, iTero sleeves and the Invisalign Lens. These are either sourced or manufactured mainly in the following countries, including (but not limited to) Australia, Austria, China, Israel, Korea, Lithuania, Mexico, Pakistan, Switzerland, Thailand, the United Kingdom, the U.S and Vietnam.</p> <p>The Align Australia Group also uses ancillary products such as dental bibs, gauze, self-etching primer, composite resin, micro brushes, gloves, cleaning wipes. These particular products are used in our training sessions with registered GPs and Orthodontists looking to become Invisalign trained providers. These products are purchased directly from the Australian entity of an international third party distributor of medical and dental supplies.</p>                                                                                                                                                                                                                                                                   | Medium      |
| External Treatment planning services | The Align Australia Group provides treatment planning services to Invisalign trained providers through experienced Australian and New Zealand registered dental practitioners who are not employed by the Align Australian Group (" <b>TPS Providers</b> "). TPS Providers provide product technical support services to enable Invisalign trained providers to utilise the ClinCheck® software more efficiently and improve their treatment planning process and do not provide any case diagnosis or decision / approval on the Invisalign trained provider's behalf. The treating doctor remains fully responsible at all times for approval and oversight of their final treatment plan. All TPS Providers are either based in Australia and New Zealand (as applicable) and are registered healthcare professionals in their field of specialty. They are free to end their commercial relationship with the Align Australia Group at any time and are compensated appropriately for the services they provide.                                                                                                                                                                                                                                                                                      | Very low    |
| Internal Treatment Planning Services | <p>The Align Australia Group provides treatment planning services to Invisalign trained providers through experienced Australian registered dental practitioners who are employed by the Align Australian Group ("<b>Internal TPS Providers</b>"). Internal TPS is not currently provided in New Zealand. Internal TPS Providers provide product technical support services to enable Invisalign trained providers to utilise the ClinCheck® software more efficiently and improve their treatment planning process and do not provide any case diagnosis or decision / approval on the Invisalign trained provider's behalf. The treating doctor remains fully responsible at all times for approval and oversight of their final treatment plan.</p> <p>All Internal TPS Providers are based in Australia and are registered healthcare professionals in their field of specialty. They are engaged as employees of the Align Australia Group and are therefore subject to the employment practices, policies and controls described in the "Our people" section of this Statement, including requirements relating to lawful employment, remuneration, training and speaking up. Accordingly, the risk of modern slavery in connection with Internal TPS Providers is assessed as <b>very low</b>.</p> | Very low    |
| Medical device products              | Our supply chain includes sourcing of raw materials, manufacturers of specialised scanning equipment, rapid prototyping machines, resin, and other advanced materials, as well as the optics, electronic and other mechanical components of our intraoral scanners. The Align Technology entities that procure these products maintain supply relationships (some of which are sole source) and also rely on third-party manufacturers and sub-assembly manufacturers. Our related entities also have visibility over raw materials in the supply chain as the raw material procurement takes place from vendors.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Medium      |
| E-commerce                           | <p>We sell our Consumer Products online through our corporate website and third-party platforms that are direct to consumers.</p> <p>Our Consumer Products can also be purchased directly from Invisalign trained providers by consumers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Medium      |

| Main supply chain category                                                                          | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Risk rating   |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| <b>Advertising services on Facebook, Instagram, TikTok, Snapchat, Google and YouTube and others</b> | Of the social media platforms with whom we contract and the advertising platforms that they provide, some have indicated that they consider the risk of modern slavery relatively low in their direct business operations because their direct workforce is largely comprised of professional qualified or skilled personnel, and they therefore do recognize that there are inherent risks of modern slavery in their supply chains. We continue to monitor the practices of the social media platforms we engage with. | <b>Low</b>    |
| <b>Intermediaries</b>                                                                               | We sell the majority of our medical devices to our customers directly through a dedicated and specialized sales force. We also sell a small portion of our products (iTero intraoral scanners) through Australian and New Zealand distributors.<br><br>All distribution agreements contained anti-modern slavery obligations and reporting requirements.                                                                                                                                                                 | <b>Low</b>    |
| <b>Couriers and freights</b>                                                                        | We use major third-party services providers for local postage, mail, and for domestic delivery services. We primarily use UPS and FedEx for international freight and transportation services including shipping, distribution, and storage. Any such freight service providers demonstrate their efforts to addressing modern slavery risks in their operations and supply chain.                                                                                                                                       | <b>Medium</b> |
| <b>IT-related vendors</b>                                                                           | Computer hardware and consumables and software. Raw materials, manufacture of consumables and disposal of e-waste may take place in geographies of concern. This industry has a higher prevalence of modern slavery in particular media reports of child labour and forced labour in the destruction of e-waste. Some of our IT vendors are based in Australia, New Zealand, USA, Japan, and China.                                                                                                                      | <b>Medium</b> |
| <b>Professional services</b>                                                                        | Legal and accounting firms, professional consultants such as marketing, HR/recruitment, IT and building management.                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Low</b>    |
| <b>Utilities</b>                                                                                    | Electronic, gas, water, telephone and data services vendors are based in Australia and New Zealand, respectively.                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Low</b>    |
| <b>Office and staff supplies</b>                                                                    | Stationery, office equipment and consumables, staff amenities, uniforms, cleaning products and catering vendors are based in Australia and New Zealand.                                                                                                                                                                                                                                                                                                                                                                  | <b>Low</b>    |
| <b>Facilities Management</b>                                                                        | Security, cleaning, and waste removal. This industry has a higher prevalence of possible migrant labour exploitation and/or underpayment of wages.                                                                                                                                                                                                                                                                                                                                                                       | <b>Medium</b> |
| <b>Rent of premises</b>                                                                             | Invisalign Australia Pty Limited leases two premises, both located in St. Leonards, NSW. All rental payments are made directly to the Australian-registered agents of the respective landlords, who are themselves Australian-based companies. This localised and transparent leasing arrangement helps reduce modern slavery risks by ensuring that payments and property management are handled through entities subject to Australian regulatory standards, including workplace and human rights obligations.         | <b>Low</b>    |

## Mitigation.



Our efforts to manage modern slavery risk in our business operations and supply chain can be grouped into the following categories:

- i. **Our people.**
- ii. **Policies and training.**
- iii. **Vendor onboarding.**
- iv. **Periodic or as needed monitoring activities of vendors.**

### i. Our people.

As at the end of the Reporting Period, the Align Australia Group had approximately 300 team members. Align Group employees show respect for one another by protecting the human rights of others. This means we do not use false or misleading practices when

recruiting and hiring. We also recognise that migrants and foreign workers may be particularly vulnerable to modern slavery and extreme forms of labour exploitation due to the difficulties that they face in understanding and securing their rights and entitlements. **Considering the nature of our workforce and our employment practices, we have assessed that the risk of Align Australia Group's operations causing or contributing to modern slavery through our employees as low.** For example:

- Our Global Code of Conduct ("**Code**") and Preventing Modern Slavery Policy prohibit child and forced labor. All employees are required to review and accept the Code promptly after they commence employment and annually thereafter. All employees are also required to complete annual mandatory training on both the Code and the Preventing Modern Slavery Policy.
- Our Global Speak-Up Policy requires all employees, third party individuals and entities that Align does business with, such as contractors, consultants, suppliers, distributors, other non-employee workers, and Align customers to speak up (confidentially if they choose to remain anonymous) without threat of retaliation if they have a good faith belief of actual or potential violations of our Code, our policies and procedures, or the law.
- All employees are required to hold and continue to hold appropriate work visas or have permanent residency or citizenship. Our candidate and employee management systems include controls intended to mitigate the risk of improper placements occurring, and employment continuing, without the appropriate work rights and skills checks being completed and maintained.
- Our employment conditions are designed to adhere to the legislation relevant to the jurisdictions in which each employee works.
- All employees and applicants are free to apply for employment opportunities, free to turn down employment opportunities and free to leave their employment at any time. We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.
- We provide compensation that is competitive and consistent with the laws that regulate minimum wage and overtime. We are committed to providing our employees with details about their work and that their wage statements and entitlements are clear and understandable. Our remuneration strategy reflects individual and company performance, job responsibilities, individual contribution, and prevailing market conditions.
- We have standard recruitment practices in place that are designed to ensure all our legal obligations are met in the recruitment and onboarding process and we only contract with formal labour providers and recruitment organisations with legitimate and established businesses.
- We promptly investigate any reports of actual or potential violations of laws, human rights or regulations or the Code through our Speak Up process.

## ii. Policies and training.

| Policy                                               | Overview                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Global Code of Conduct ("Code")</b>               | <p>The Align Group follows our Code which defines the ethical standards we each must follow to conduct the business of the Align Group with integrity and in compliance with laws. Our Code also includes examples of what to look out for to avoid unethical or illegal conduct. As such, anyone representing the Align Group is prohibited from taking unfair advantage of anyone else through manipulation, fraudulent inducements or concealment, abuse of confidential or privileged information or any other unfair dealing. In accordance with our Code, we seek out partners, including vendors, that demonstrate strong values and ethical principles. We work to avoid those that violate the law or fail to comply with the sound business practices we embrace.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Preventing Modern Slavery Policy and Training</b> | <p>Effective December 1, 2024, the Align Group implemented the Preventing Modern Slavery Policy. Align's Code defines the ethical and conduct standards that each must follow to conduct the business of Align with integrity and in compliance with laws. Also, Align's policies and integrated approach to preventing modern slavery are based on internationally recognized labor and human rights standards such as the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Ten Principles of the UN Global Compact (UNGC), the ILO Core Labour Principals, the ILO Conventions on Child Labour No 138 and No 182 as well as the ILO-IOE Child Labour Guidance Tool for Business. These are the current authoritative global standards for addressing modern slavery and other human rights harms associated with business activities.</p> <p>All Align team members globally are required to undertake and complete annual mandatory training in relation to demonstrate that they have read and understood the Preventing Modern Slavery Policy.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Intermediary Due Diligence Guidelines</b>         | <p>Align Group's Intermediary Due Diligence Toolkit and, as of 1 December 2024, our Global Intermediary Due Diligence Guidelines establish our expectations related to selecting, onboarding and renewing business with entities or individuals that interact with other entities or individuals on our behalf ("<b>Intermediaries</b>"). Business with Intermediaries should be based on trust and a shared commitment to bring our brand and products to market ethically and compliantly.</p> <p>We ask our Intermediaries to adhere to the same ethical and legal principals we follow. We do not ask our Intermediaries to do something that is unethical, illegal, or inconsistent with our Code. During the Reporting Period the vendor onboarding process was automated via our internal vendor onboarding tool, or a manual process where it was not available.</p> <p>We select Intermediaries based on value, the quality of the goods and services provided, reputation, price, and experience. When selecting Intermediaries who are significant to our operations, we consider them in a competitive process designed to identify the Intermediary that is the best fit. We document our selection of each Intermediary in a Business Decision Form.</p> <p>When onboarding a potential, or renewing an existing, Intermediary, we obtain information from the Intermediary, typically through a Due Diligence Questionnaire or a risk-based due diligence report, including a request to confirm the Intermediary has all required licenses to conduct the services desired by us. Any flags identified reviewed by a qualified legal or compliance employee. If necessary, and in the Align Group's sole determination, an Intermediary may be asked to provide additional information to evaluate the flag. We expect Intermediaries to cooperate with our review and processes to understand flags that are found during the diligence process. The Align Group business relationship owner and other internal functions are involved in the review of the flags, as appropriate.</p> <p>Once flags are addressed, the Align Group Business Relationship Owner and their manager or another appropriate leader will determine whether to approve or deny the Intermediary.</p> |
| <b>Speak Up Policy</b>                               | <p>Grievance mechanisms are vital for workers to raise issues that need to be addressed. As part of our commitment to honest and ethical behavior, we have a Speak Up Policy through which we require all employees, third party individuals and entities that the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                              | <p>Align Group does business with, such as contractors, consultants, suppliers, distributors, other non-employee workers, and Align Group customers, to report any actual or potential violations of Code, our policies and procedures, or the law. Reports are responded to or investigated by an independent and qualified investigator, as appropriate based on the nature of the report. The Align Group encourages all employees to present ideas, raise concerns, and ask questions. Every people leader in the Align Group is responsible for listening to and escalating potential or actual allegations reported to them. The Align Group also provides a third-party website and mobile QR code to facilitate anonymous reporting.</p> <p>Our Speak Up mechanism is also available for third parties.</p> <p>In addition, in accordance with Corporations Act 2001 (Cth) in Australia, the Speak Up Policy has been amended accordingly.</p> |
| <b>Intermediary compliance training</b>                      | <p>We require our Intermediaries to undergo periodic compliance training including on Align Group's standards in respect of compliance with applicable laws, and anti-bribery and anti-corruption measures. We also ask Intermediaries to sign an annual Compliance Certificate, which includes commitments that they have read, understood and followed Align Group's Intermediary Code of Conduct and requires that they report, in writing, any actual or suspected violations of labour, anti-human trafficking, and conflict minerals laws.</p>                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Harassment and Discrimination-free Workplace Policies</b> | <p>We are committed to maintaining a workplace free from discrimination and harassment. The Align Group does not tolerate or condone bullying, harassment, victimization (including unlawful behaviour) under any circumstances. The Align Group has appropriate policies in place in each of its member entities as may be required by local laws and consistent with the Code. While these will vary somewhat between territories, these policies generally set out steps employees can take if they become subject to or aware of any acts of discrimination or bullying or harassment. These policies set out what the member entity will do if a complaint is made and what actions it may take. Penalties may include disciplinary action, including suspension or termination of employment where appropriate or justified under the circumstances. These policies are designed to meet the requirements of applicable local laws.</p>          |

### iii. Vendor onboarding.

As part of the Align Group vendor onboarding process, vendors and other business partners going through our automated onboarding process answer certain questions that allow us to assess risk. These questionnaires are generally completed and undergo a thorough risk assessment prior to the vendor providing any goods or services. The Align Group generally follows the following steps when onboarding a vendor:

- Request or create an onboarding request through the Align vendor portal.
- Vendors will be subject to a series of due diligence questions, which, depending on the type of vendor, may include questions directed to general, finance, quality assurance, data privacy, anti-bribery/anti-corruption, and/or cyber/technology risks.
- Qualified Align employees review vendor information provided and assess and address any risk prior to a vendor being approved to be onboarded.
- Global vendor onboarding employees review information for completeness and create vendor accounts in Align's systems.

Depending on the vendor categorisation, vendors may also be required to go through Align Technology's Quality Management System ("QMS"). Potential new vendors who are required to go through our QMS process are required to complete additional and more detailed questions disclosing, among other things, their efforts to evaluate and address risks of human trafficking and slavery. These questionnaires are reviewed by internal personnel. If a vendor does not meet acceptable standards of doing business ethically, we refuse to enter into a business relationship with them.

In December 2024, Align Technology, Inc., the ultimate parent company of the Align Australia Group, implemented a new vendor categorisation structure to provide greater clarity and oversight to modern slavery risks and assessments across its global operations. Align now assigns its suppliers and vendors to one or more of 90 possible categories of which 48 may have elevated risks of modern slavery. All suppliers and vendors within these 48 categories which are also located in countries with enhanced, or heightened risk of child labour (according to the UNICEF Children's Rights in the Workplace Index) are required to answer additional and specific questions regarding modern slavery.

#### iv. Ongoing monitoring activities of vendors.

Once a vendor has been categorised and onboarded into our systems, we have quality processes in place to monitor vendors. A risk-based approach to vendor quality management is performed which is designed to ensure compliance and regulatory obligations are met – the degree of control is commensurate with the significance of the product or service supplied, including: capacity/scalability, catastrophe/geopolitical, and quality/regulatory.

Ongoing controls may include, among others, the following:

- i. Verification and inspection of products: verification and inspection of products or other activities are performed by the Align Group in each relevant country to assess if specified requirements are being met.
- ii. Vendor re-evaluation: all vendors that are onboarded are identified in the Align Group's systems to be reevaluated. The frequency of vendor re-evaluation is determined based on the vendor's QMS classification, or after becoming aware of certain events (e.g., mergers, acquisitions, product/service changes, non-conforming products).
- iii. Auditing: The Align Group may perform audits based on assessments made as part of the evaluation or re-evaluation of certain vendors. The scope of any audit is based on the acceptance criteria and level of risk of the product or service provided by the vendor. An annual vendor audit schedule is established with input from applicable stakeholders. Unscheduled or unplanned vendor audits may be performed as needed throughout the calendar year due to new business, substantial/significant business changes and business/QMS risk.
- iv. Enforcement: For instances of material violations of laws, regulations or our Code, we take necessary actions, including but not limited to removing or inactivating the vendor from the approved vendor list, replacement of the vendor, or reduction or withholding of future business unless and until the material violations are corrected.

#### Effectiveness.



We monitor the effectiveness of our actions based on internal data and direct feedback from vendors, distributors and our employees and strive to continually improve our systems and processes, taking corrective action, as needed.

In assessing the effectiveness of our actions, set out below are some of the actions that we have taken to mitigate risks of modern slavery in our operations and supply chains.

##### a. Global supply template.

Our global Invisalign supply agreement template includes a standard modern slavery clause with which vendors are required to comply, and this continued to be the case through the Reporting Period. These contractual obligations include the requirement to comply with all applicable laws concerning the eradication of forced, indentured, involuntary or compulsory labour including child labour.

##### b. Continued development of workplace reporting and processes.

All employees and contractors with Align system access are required to complete annual training on our Code. Our Global Speak Up Policy provides the framework for when we must speak up about conduct that may be inconsistent with our Code, other policies and procedures, or the law; and for how The Align Group implements this commitment to speaking up. Following this Policy allows the Align Group to respond to concerns and questions promptly and objectively; and to be fair to those who speak up. Concerns related to modern slavery and supply chain compliance would be raised under this Policy and resolved under our global processes. During the Reporting Period none of the initiated speak-up cases related to child or forced labour.

##### c. Vendor Questionnaire and Intermediary Onboarding Due Diligence Questionnaire.

Assessments of vendor policies and practices continued throughout the Reporting Period and vendor assessment questionnaires continued to be used to understand vendors' business practices and processes. Our vendor questionnaire includes questions designed to support the identification of modern slavery risks and foster collaborative efforts between us and our vendors to address these risks. Additional due diligence may be undertaken, if required. Depending on the type of vendor and the product and service they supply, the questions and information that we ask may include:

- the type of labour used in each vendor's organization;
- if any of the services or products provided use contract workers or seasonal workers; if the vendor has a vendor code of conduct that their vendors in turn are required to comply;
- if they have internal written policies and procedures that are intended to set conduct expectations and prevent and detect human trafficking and/or modern slavery concerns;
- if the vendor provides training to its employees on mitigating risks of human trafficking and slavery in the supply chain; and
- if the vendor has received any reports or been the subject of any concerns, charges and/or investigations related to modern slavery and/or human rights violations in its operations and supply chains within the past 5 years.

In the Reporting Period, globally 420 vendors completed Align Group's onboarding due diligence questionnaires of whom 33

vendors answered one or more questions with "no". Some of them did not understand the questions properly and after a discussion with us corrected the answer into "yes". All others could provide justified reasons for their answers that we could admit that the modern slavery risk has been remote. Our assessment showed no suspicion of modern slavery at these 33 vendors.

#### **d. Audits**

In the Reporting Period, Align Technology and its related bodies corporate globally participated in 14 audits Align Technology conducted either on site or remote audits for quality management reasons. 9 vendors could prove during the audit that they have a human rights policy implemented and comply with human rights and 5 were asked in addition to sign the Anti-Forced Labour ("AFL") questionnaire. The AFL audits didn't show any issue with forced or child labour.

#### **e. Geographic Risk Assessment.**

Align Switzerland implemented the Directive regarding Human Rights in 2024, setting out its commitment to uphold human rights and prevent child labour across the group. All subsidiaries of Align Switzerland, including the Align Australia Group, completed a self-assessment questionnaire in 2024.

Under this framework, operations located in a high-risk environments, or in a medium-risk environments with relevant human rights concerns, are required to undergo a more detailed risk assessment. The scope and methodology of any such assessment is determined with the Align Compliance and Ethics Department on a risk-based basis and may include, among other things, interviews with internal and external stakeholders (including employees, contractors, trade unions, community representatives, local authorities and NGOs), as well as internal and external audits.

No issues or controversies were identified through the 2024 self-assessments, and accordingly no in-depth assessments were required.

Notwithstanding this, Align Switzerland undertook targeted additional risk assessments in the following countries:

Armenia (7 vendors signed the Anti-Forced Labour questionnaire ("**AFL Questionnaire**") in 2023), Russia (11 vendors signed the AFL Questionnaire), South-Africa (2 vendors signed the AFL Questionnaire), Ghana (5 vendors signed the AFL Questionnaire ), Vietnam (6 vendors signed the AFL Questionnaire), India (6 vendors signed the AFL Questionnaire ), Thailand (3 vendors signed the AFL Questionnaire in 2024) and Hong Kong (5 vendors signed the AFL Questionnaire).

These assessments did not identify any actual or alleged instances of forced labour or child labour.

#### **Future steps.**



Identifying and managing our modern slavery risks in our operations and supply chain is ongoing. We will continue to update and refine our practices.

#### **Consultation**



The Align Australia Group operates as an integrated group of entities with common governance, compliance frameworks and reporting processes, consistent with the broader approach adopted across Align Technology's global operations, particularly given the Group's reliance on a global supply chain for products supplied in Australia and New Zealand. In addition, the three Australian reporting entities and the New Zealand entity share a common board composition, which supports consistent oversight and alignment of approach across those entities.

In preparing this Statement, Align Technology (Australia) Pty Limited consulted with the entities it owns or controls, including Invisalign Australia Pty Limited, ICA Holdings Pty Ltd and the relevant New Zealand entity.

Given the Align Group's global operating model and reliance on globally managed supply chains, consultation beyond the Australian reporting entities is also necessary to ensure that this Statement accurately reflects the relevant risks and mitigation activities. Accordingly, the preparation of this Statement also involved consultation with global Align Technology teams, including the Align Technology internal Modern Slavery Centre of Excellence and relevant legal and compliance stakeholders.

The consultation process included:

- consideration of global and regional materials and due diligence prepared by other Align group entities, and their application to the Align Australia Group context; and
- engagement with relevant internal stakeholders (including legal and compliance teams) to confirm applicable risks,

controls and mitigation activities.

This consultation occurred during the preparation of this Statement, including at drafting and final review stages prior to approval.

The preparation of this Statement, including Align Australia Group's commitment to eliminating the risk of modern slavery in our supply chains and operations, continues to have the full support of our Australian leadership.

## Approval.



In accordance with section 14 of the Modern Slavery Act 2018 (Cth) this joint Statement has been approved by the sole director of Align Technology (Australia) Pty Ltd on 28 June 2025 on behalf of itself and ICA Holdings Pty Ltd and Invisalign Australia Pty Limited, which is signed on their behalf by the Sole Director designated below, and the information in this Statement is true, accurate and complete in all material respects for the Reporting Period.

Signed by:  
  
EDF5D89E9A22494...

**Sasithorn Theinthong, Vice President and Managing Director, Australia and New Zealand**

30 June 2026

*"I have the authority to bind Align Technology (Australia) Pty Ltd, ICA Holdings Pty Ltd, Invisalign Australia Pty Limited and their subsidiary companies."*



