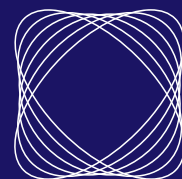


# Code of ethics



Adria  
Dental  
Group

---

# Contents

## 3 **Introduction**

4 Whom does this code of ethics apply to?

4 What is this code of ethics based upon?

4 *Mission of ADG*

4 *Vision of ADG*

5 *ADG values*

## 6 **Ethical principles**

7 Principles of behavior in relationship with patients

9 Principles of behavior within the organization

12 Principles of behavior towards external staff and the public

14 Principles of responsible business conduct

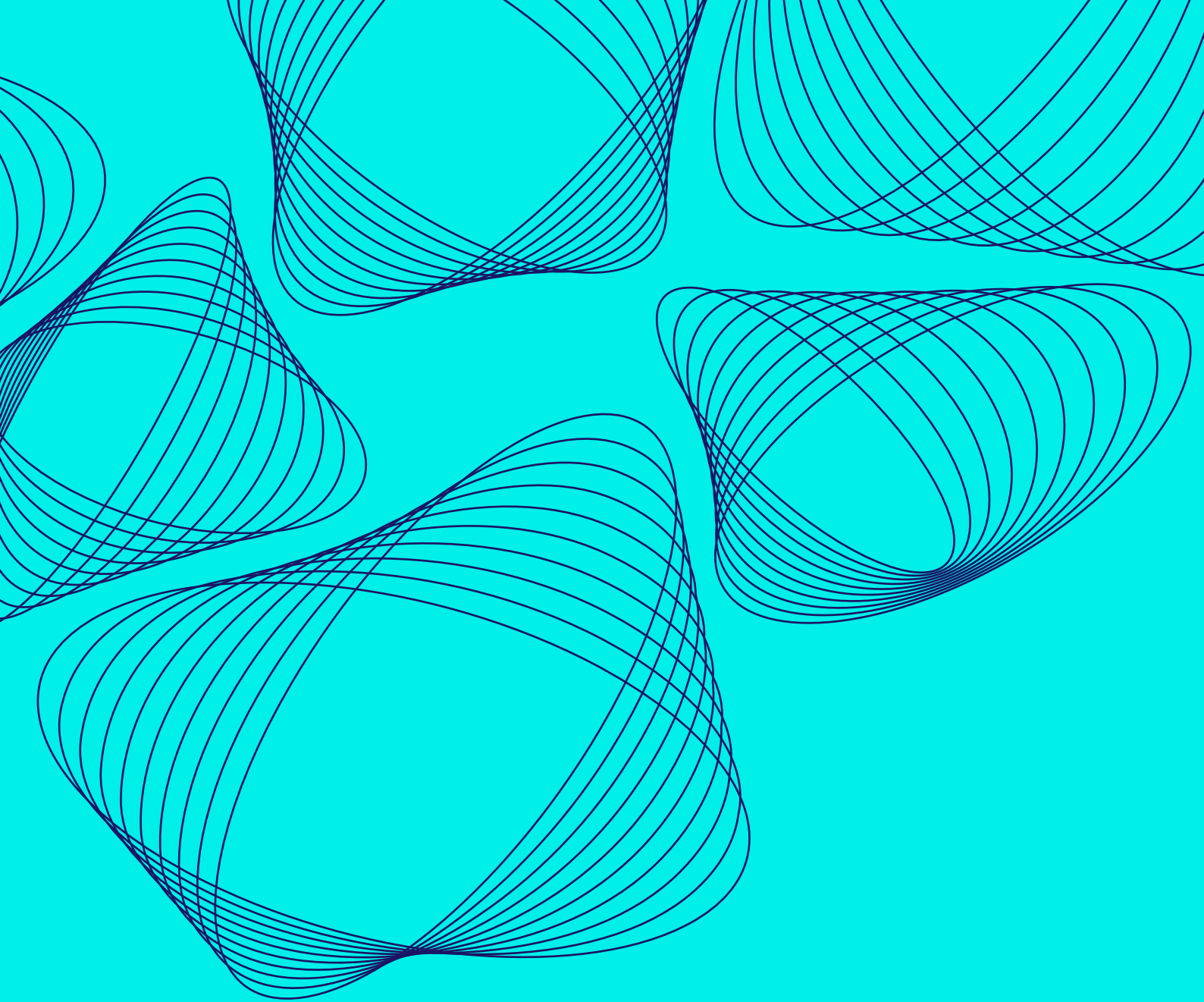
## 16 **Final provisions**

17 How is code of behaviour managed and who manages it??

17 I have a problem, who can i speak to?

17 When does the code of ethics enter into force?

17 The availability of the code of ethics



# Introduction

With this Code of Ethics, we want to clearly define and convey information about the ethical responsibility and principles of all of us in Adria Dental Group. This way, considering the continuous growth and development of the group and its members, we want to ensure the highest labor standards for our patients and employees.

### **WHOM DOES THIS CODE OF ETHICS APPLY TO?**

Provisions described in this Code of Ethics apply to all members and employees of Adria Dental Group (hereafter ADG) as well as all the others who are not employed by ADG but take part in its work and activities.

The trust of all stakeholders and the reputation of ADG depend on all of us. Our work is evaluated not only by what we do but also by how we do it.

Every employee of ADG shall respect the principles of this Code of Ethics, reject every action that is contrary to the principles of it and report it to the ethics committee. Every action that is contrary to the provisions of this Code of Ethics shall be subject to employment liability as defined in the Rules of Procedure of ADG members.

### **WHAT IS THIS CODE OF ETHICS BASED UPON?**

This Code of Ethics is based upon the mission, vision and fundamental values that are the backbone of our business and ensure that **the patient always comes first.**

#### **Mission of ADG**

Our mission is to provide complete and highest quality dental care to all patients, while at the same time building with them a relationship of safety and long-term mutual trust.

#### **Vision of ADG**

We aim to constantly improve the quality of our service through the use of high-quality technology and excellent materials.

We want to grow and prosper to ensure that our patients get the dental experience based on trust, quality of work and the utmost care, with the aim of improving the overall health and quality of life. We provide our employees with the best working conditions, thus encouraging their maximum professional development.

## ADG Values

### DEDICATION TO PATIENTS



- With a holistic approach, we provide the best dental care, thus improving the quality of life in accordance with the patient's needs.
- Every interaction with our patients is marked by respect and empathy.
- We provide every patient with the same quality and safety, respecting the rules of the profession.

### EXCELLENCE



- We set the highest quality standards in everything we do.
- We work in accordance with the highest professional and technological standards in the field of dentistry.
- We continuously learn and invest in professional and personal development.
- We encourage and accept continuous improvements and changes.

### RESPONSIBILITY



- We communicate transparently about expectations and responsibilities.
- Each and every one of us take responsibility for accomplishing our tasks in the best way possible.
- With a mentoring approach, we encourage others to take responsibility.
- We dispose of all our resources responsibly.
- We respect our obligations as well as the time and obligations of others.

### INTEGRITY

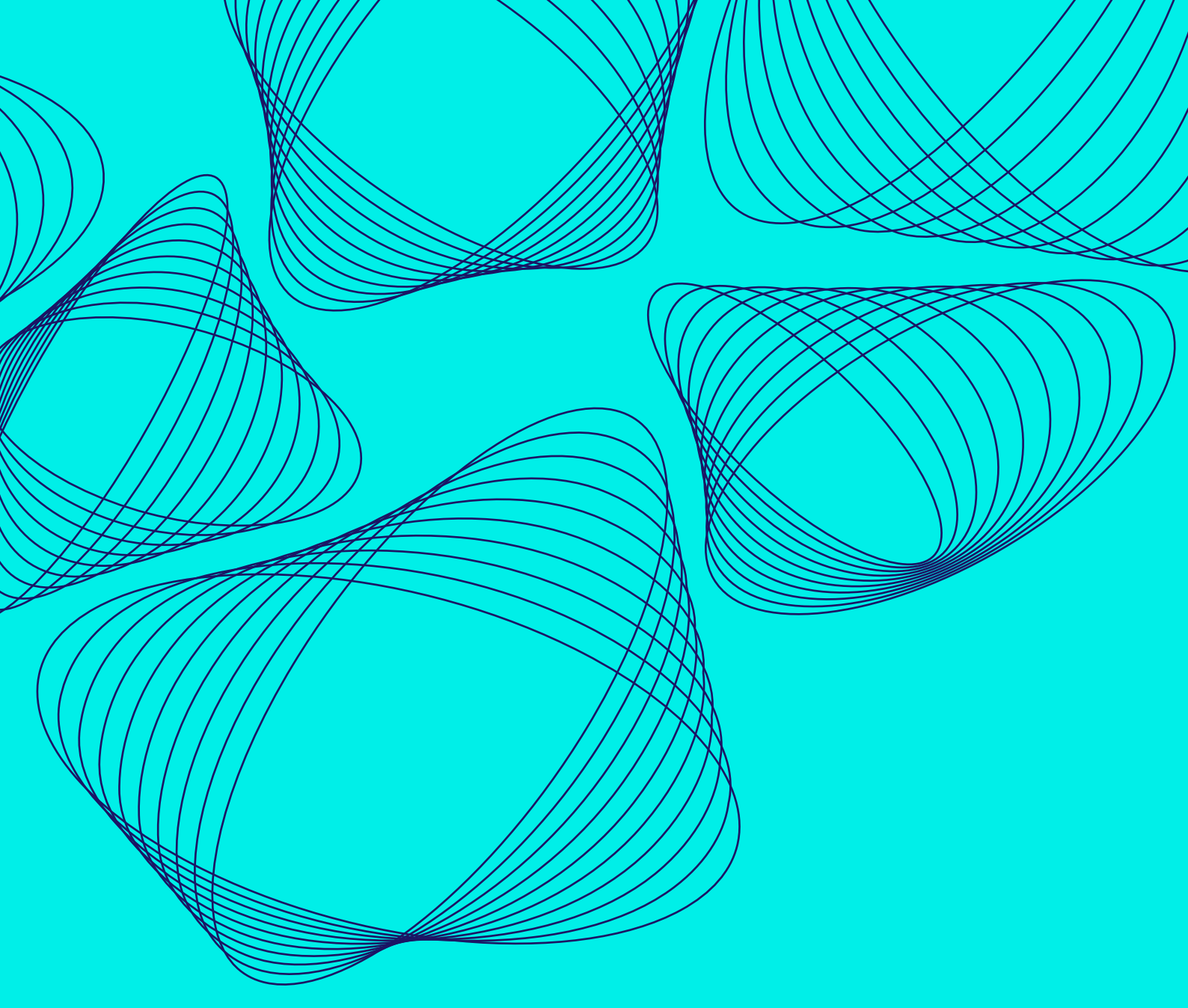


- We build relationships of trust based on respect, confidentiality and honesty with our patients, colleagues, suppliers, partners and all other stakeholders of operating and strategic business.
- We establish and implement the same rules in the operating and strategic business of the group.
- We ensure compliance with ethical standards by example and simple procedures for reporting and solving problems.

### TEAMWORK



- We recognize and appreciate the contribution of every individual. We appreciate diversities, learn from them and build upon them.
- We help each other regardless of the department.
- We support new colleagues to make them feel good and to quickly integrate them into the team.
- We respectfully communicate with each other and solve problems constructively.
- We spread a positive atmosphere while interacting with our colleagues, showing empathy and cordiality.



# **Ethical principles**

Code of Ethics consists of **principles of ethical behavior** which ensure mission and values accomplishment in daily business:

- principles of behavior in relationship with patients
- principles of behavior within the organization
- principles of behavior towards external staff and the public
- principles of responsible business conduct.

## Principles of behavior in relationship with patients

Everything we do is aimed at providing a patient with high-quality service through teamwork and respect for all his rights and needs. Our goal is to improve the quality of patient's dental health and life. This can be seen in our expertise, approach and the equipment we use.

- Individually and in teamwork, we do what is best for the patient while providing him with complete dental care. In case of uncertainties while performing a certain procedure, the interest and safety of the patients always come first, and the doctor in charge has full decision-making responsibility.
- Through all our actions we show respect, cordiality and empathy towards the patient and care for the highest communication standards.
- We respect the patient's right to his physical and mental integrity as well as his privacy. We provide dental care to all patients regardless of sex, gender, age, race, nationality, language, property, national or social origin, sexual, religious or political beliefs, social status or other aspects of the integrity of the individual. We always respect the integrity of a person as well as basic human rights.
- We educate patients about the way and the importance of self-care and the responsibility of one's oral health.
- In our relationship towards the patient and in the provision of health care services, we work in a way that respects the meaning and provisions of laws and regulations of the countries in which the group operates that relate to our field of action.
- With our approach, expertise and use of high-quality technology, we set new standards in the provision of dental care while keeping up with the needs of patients and providing a solution in accordance with their abilities.

## HOW TO ACT?

? We have a chance to offer an implant that is not necessary, but is a possible solution to patient's problems. However, the cost for the patient is significantly higher. Is it acceptable to offer this option?

→ It is acceptable to present the patient with all options promptly, with clearly defined information about the need from a professional side and the financial cost, leaving the decision to the patient in a respectful and neutral manner.

? The patient is worried about the period after the procedure. Is it enough to say that everything will be fine and that you have done everything to make him feel well?

→ It is not enough. For the patient to feel that he is taken care of, it is necessary to ask what exactly worries him, and then explain the situation in more detail. The patient needs guidance on how he can continue to take care of his dental health depending on a specific procedure. If necessary, information on how he can contact you afterwards should also be mentioned. Every patient is different and it is important for us to know how we can help each one.

? The patient who has an appointment enters the waiting room, but it is crowded and there is no place to sit. I have noticed that none of my colleagues has spoken to that patient. What would be the right thing to do in that situation?

→ It is necessary to speak to the patient, apologize and search for an additional chair or find another way to ensure that he has a place where he can comfortably wait for his appointment. The best thing to do is to check the schedule and find a solution in advance, whether by smaller changes to the schedule or promptly finding an additional place to sit. We want the patient to know that he is extremely appreciated.

### ***Who can you speak to:***

If there is a problem related to a doctor-patient relationship, speak to the team leader, head doctor, director of the polyclinic, person from the human resources department, operations manager or an ethics commissioner.

(Check the "I have a problem, who can I speak to?" chapter)



# Principles of behavior within the organization

Our responsibility and excellence in providing service to patients are ensured through quality cooperation and mutual relationships. Our patients can see that.

- Everybody assumes responsibility for the best possible accomplishment of their tasks in accordance with their workplace and their legal and organizational obligations and responsibilities, as well as Code of Dental Ethics and Deontology.
- We acknowledge and appreciate the contribution of every individual and nurture a relationship based on respect, propriety and collegiality. We treat others equally, regardless of their sex, gender, age, race, nationality, language, property, national or social origin, sexual, religious, political or other beliefs, social status or other aspects of the integrity of the individual.
- We communicate with each other in a way that reflects the highest standards of behavior. We cooperate and help each other, regardless of position.
- Through our example, we transfer the values of ADG to others, and the leaders have a crucial role as promoters of values.
- We clearly recognize the compliance of behavior with the values and ethical principles of ADG, we communicate about them in our day-to-day relations and adequately evaluate them through a reward system.
- We define and apply processes and procedures that are uniform and efficient for everyone in the group. We constantly encourage and accept improvements in the quality and efficiency of our services. This way we demonstrate that we are ready for changes.
- We do not transfer nor exchange with others information that does not have business importance or is not intended for them, especially information that offends someone's privacy.
- We continuously learn and invest in the professional and personal development of our employees. In the process of integrating new colleagues or taking on new roles and responsibilities, we encourage and mentor each other while transferring information and knowledge.

## HOW TO ACT?

? I am unable to attend a meeting about the implementation of an important joint project of the polyclinic. Is it enough to say that I cannot make it?

→ When you are unable to perform your obligation where you are expected to contribute, apologize and agree on how you will make up for the absence – send your opinion in advance, agree on who will substitute for you, convey information about what had happened and how you can express your opinion at a later date. This is your way of showing that you care about your colleagues' time, joint task and goal and that you actively participate in the work of the team although you were unable to attend the meeting.

? I am the team leader and one of the colleagues in my team is very hard to cooperate with and often very unpleasant in communication with other colleagues, except with me. He is very professional and the patients love him. I sometimes mention that his attitude towards his colleagues is not acceptable, but he claims that he does not mean it and quickly forgets about it. I am not sure whether I should be clearer about it, considering the fact that patients are satisfied with him. He is very impulsive, what if he decides to leave?

→ It is necessary to establish clear rules which need to be followed when it comes to relationships with colleagues, no exception. Explain that it is possible to criticize someone's work, but it has to be done respectfully. If an open conversation about this does not result in behavior changes, a verbal or written warning should be considered. If you are not sure how to do it, consult with the human resources department for additional information.

? A decision was made to increase the number of calls to former patients in order to increase appointment occupancy. The reception staff is responsible for this, and this is how they managed to get a high turnout. However, this resulted in crowded consulting rooms, where the staff was not aware of the change. When they complained, they were told that such a decision had been made.

→ When making decisions, it is necessary to consider the bigger picture of your consulting room, service or your business. Coordination of activities and sufficient information provided beforehand is crucial so that everybody is prepared to provide the best care possible for the patient. This shows that we understand that only with joint effort can we provide high-quality service and that each and every one of us participate in our own way.

? At the managers' meeting, we discussed an important topic. However, there were two opposing views. In the end, a decision opposite of what I, as the manager, said was made with an explanation that it is better at the polyclinic level. Am I allowed to tell other people that I was against it?

→ In front of his team members and other associates, the manager shall present every decision made at the level of ADG or members of the group with a positive attitude and as a joint decision in order to make it easier for everyone to accept changes.

? A new colleague asked me to show him how something should be done, however, that is not my job although I have the necessary knowledge. I told him who was in charge of that and went on with my job. Have I done the right thing?

→ Everybody can share their knowledge and help other colleagues improve as quickly as possible and feel accepted and equal. It is always possible to say that there are some details we do not know and refer them to someone who does, but everybody is responsible for helping others as best as they can.

? I heard a colleague insult another colleague for not having a husband yet. What is the best thing to do?

→ It is completely inappropriate to say rude things about colleagues and their life choices and situations, even if it was just a joke. Any harassment and usurpation of a person's personal integrity, verbal or of any other kind, is unacceptable. It is important to report these kinds of behaviors and show support to the person subject to jokes or gossip.

### ***Who can you speak to:***

If there is a problem related to behavior within the team, speak to the team leader, director of the polyclinic, someone from the human resources department, or an ethics commissioner.

(Check the "I have a problem, who can I speak to?" chapter)

# Principles of behavior towards external staff and the public

We maintain our integrity beyond the boundaries of our organization. We consider our associates an important part of our work, therefore, we treat them that way. We want to spread our positive influence to the society we live and work in while protecting the privacy and integrity of everyone involved.

- We build relationships based on trust, confidentiality and respect with suppliers, partners and other stakeholders.
- In all our actions, we protect and improve the reputation of ADG, all members of the group and every individual. We do not speak in public without the previous approval of ADG management. When in public, we act in accordance with ethical rules.
- Within the organization and in public we act responsibly towards confidential information of ADG, members of the group as well as our associates.
- In all members of the group, we respect joint decisions and the procedures of procurement and suppliers of ADG.
- We support the academic development of our employees and actively participate in the scientific and professional community through research, education and exchange of knowledge.
- Involvement in the work of the professional and academic community, including clinical studies, is approved by the Medical Ethics Committee to ensure the protection and integrity of patients, employees and ADG as a whole.
- When communicating on social networks of all members and ADG, we protect our integrity and communicate respectfully with everyone who gets in touch with us. Only those who are authorized to do so and it is in their job description actively communicate on behalf of ADG or members of the group via social networks.

## HOW TO ACT?

? We had a supplier we were satisfied with until we became a part of the group. Now we have to restock and we would be glad to continue working together, but ADG does not approve of this supplier. Can we still work with the supplier?

→ In accordance with joint procurement rules, it is important to respect the list of suppliers approved by the group, no exception. This ensures compliance with the conditions agreed at the group level and ensures optimal quality, delivery and financial conditions.

? I found out from a private source that a certain dental clinic is negotiating about joining our group. Should I share this information with my colleagues to let them know who will be joining us?

→ Unverified information shall not be spread within the group or outside of it. The person in charge of corporate communications and ethics commissioner shall be notified about a possible spread of confidential or fake information.

? A supplier called me to give a lecture at a conference. If they called me, does it concern the person who is my immediate superior or should I accept the offer without prior consultation?

→ It is necessary to speak to your immediate superior about the way of participating as well as the topic and to obtain approval for participation from ADG management. It is necessary to follow our ethical principles while presenting and participating because your behavior affects the reputation of ADG as a whole. ADG will gladly support every participation of its employees in the exchange of knowledge within the professional and academic community, in accordance with its values and principles. Prepare for your presentation using adequate materials and data. The person in charge of corporate communications can help you.

### ***Who can you speak to:***

If there is a problem related to behavior towards associates or the public, speak to the team leader, head of procurement, director of the polyclinic, the person in charge of corporate communications, person from the human resources department, operations manager or an ethics commissioner.

(Check the “I have a problem, who can I speak to?” chapter)

# Principles of responsible business conduct

Our responsibility is not only our service but also our duty to rationally handle resources while protecting the environment, health and safety of our patients and employees.

- We protect all the resources of the group and its members, such as space, equipment, and consumable materials and use them responsibly and efficiently in our work, in accordance with the bylaws of the members of the group.
- We aim to reduce the risks of harmful effects on the environment of our day-to-day business, so we properly dispose of medical and other types of waste, and avoid unnecessary use of electricity or other resources in accordance with legal provisions and regulations while protecting the environment, health and safety.
- We share all data and information in a way which ensures the maintenance of the confidentiality of all professional secrets, personal data and other related rules and applicable laws.
- In the case of an ethically inappropriate procedure, we will report it to the persons listed as contacts for certain principles or inform the ethics committee in another way.

## HOW TO ACT?

? Sometimes the colleagues bring home interdental toothbrushes that are provided by the faculty and are intended for patients. Usually there are enough interdental toothbrushes, although sometimes we run out of them when a patient needs them. Is it acceptable to use such free items for private purposes?

→ Equipment and materials in polyclinics, regardless of the source, are intended for patients and it is necessary to handle them responsibly. It is forbidden to use equipment and materials for private purposes, either within the polyclinic or outside of it.

? I prepare sterile compresses for the doctor, however, they sometimes end up not getting used. Do I have to dispose of unused prepared sterile compresses in medical waste?

→ If you are not sure how to handle waste, be sure to consult with an ESG standards commissioner or the person in charge of maintenance. If there is no such possibility, be sure to act in a way which protects the health and environment. In this case, disposal in medical waste is crucial.

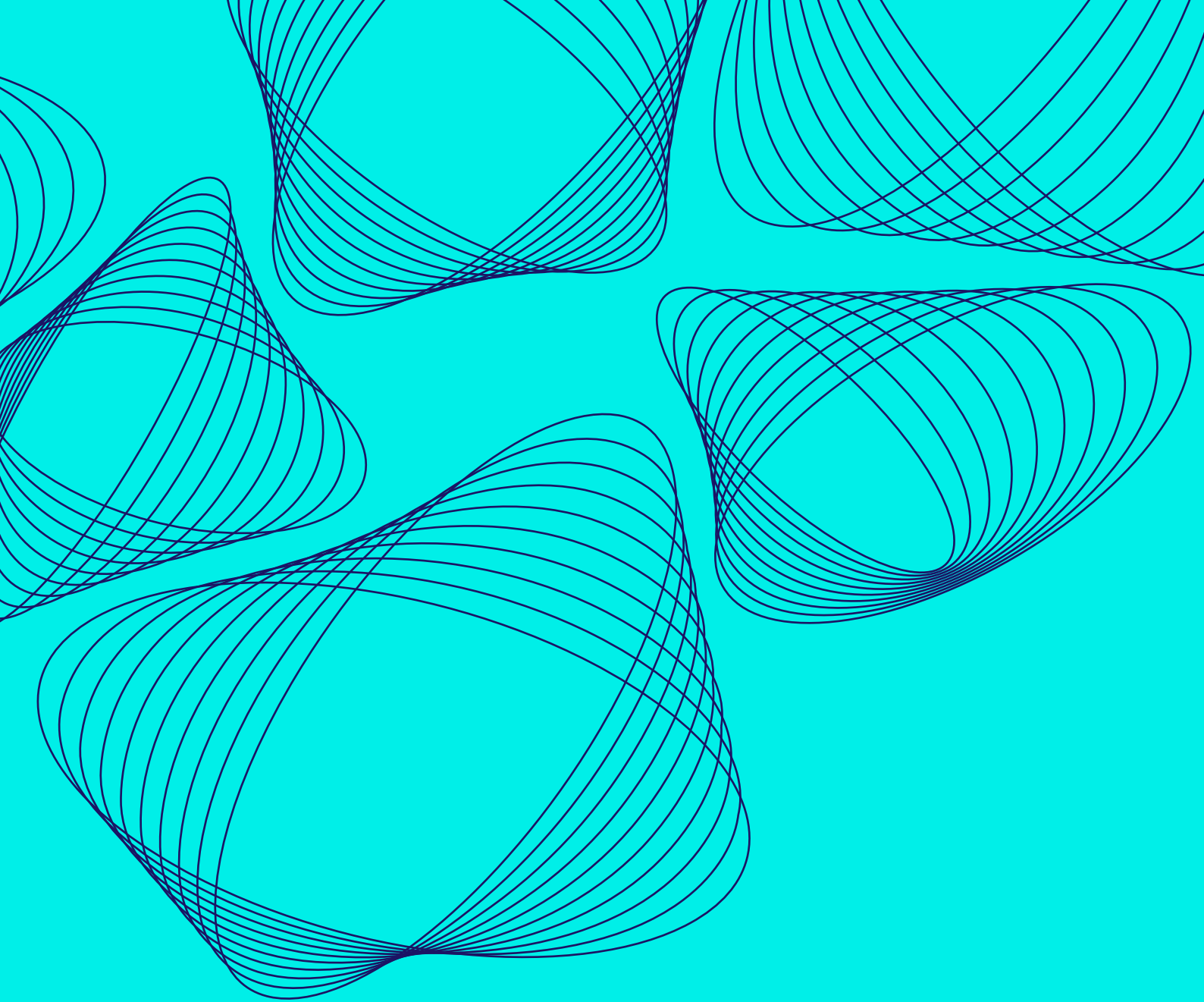
? I have noticed that a colleague occasionally shares details from our day-to-day life on social media and it is easy to tell who she is sharing information about. When talking to her, I briefly mentioned that it was against ethical principles and not acceptable. As far as I can see, she did not stop. This is nothing too serious, but I am not sure whether I should inform someone about it. I don't want to come off as frivolous.

→ Behaviors that violate ethical principles are worth reacting to and you shall report them to persons listed under each principle depending on the topic or to the ethics commissioner. They will be able to assess the situation adequately and react in an appropriate manner.

**Who can you speak to:**

If there is a problem related to responsible business conduct, speak to the team leader, director of the polyclinic, someone from the human resources department, the person in charge of ESG standards or an ethics commissioner.

(Check the “I have a problem, who can I speak to?” chapter)



# **Final provisions**



## **HOW IS CODE OF BEHAVIOR MANAGED AND WHO MANAGES IT?**

The Code of Ethics and the procedures arising from it on behalf of ADG are managed by the ethics committee, which is defined at the level of ADG, and which is made up of representatives of all members and ADG management. All the details of the work of the ethics committee are part of the Statute of the Ethics Committee of ADG.

The goal of ADG is to change and adapt the Code of Ethics according to the development of the organization and employees shall be informed about it in due time.

## **I HAVE A PROBLEM, WHO CAN I SPEAK TO?**

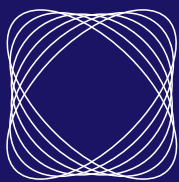
- Next to each principle, it is indicated who you can contact to discuss the problem you have noticed. Moreover, you can always speak to the ethics commissioner.
- ADG has an ethics commissioner in every group member, who is appointed by the ethics committee.
- Everyone can contact ethics commissioners in a simple way and through several communication channels (e-mail, telephone or personal contact).
- If a person wishes to, they can file a report directly to the ethics committee at [etika@adriadental.com](mailto:etika@adriadental.com)

## **WHEN DOES THE CODE OF ETHICS ENTER INTO FORCE?**

This Code of Ethics shall enter into force on the date of its publication via official communication channels of ADG and all its members.

## **THE AVAILABILITY OF THE CODE OF ETHICS**

- An electronic copy of the Code of Ethics has been sent to every employee via the official e-mail address.
- It has been posted on the official website of ADG: [adriadentalgroup.com](http://adriadentalgroup.com)
- ADG periodically conducts trainings on the principles of ethical behavior in various forms.
- Every new employee has been familiarized with the existence of the Code of Ethics and this topic is a part of the introductory training for new employees.
- Trainings have been adapted to the person's position because we believe that managers have a particularly important role in implementing ethical principles, values and the mission through the organization.



**Adria  
Dental  
Group**