vVARDIS Holding AG

Code of Business Conduct and Ethics

Foreword by Haleh Abivardi and Golnar Abivardi, Co-Founders and Co-Chief Executive Officers

When founding vVARDIS, our goal was to create a company whose impact would significantly improve oral health care worldwide. We believe our corporate DNA, rooted in scientific innovation, quality and integrity, is the key to our success and a promise of better outcomes for millions around the world.

We are also convinced that the success of vVARDIS depends directly on the behavior of each and every one of us. Placing ethics at the heart of our business conduct is critical to pursuing our mission.

Of course, this requires complying with all applicable laws and regulations, but we must go further and ensure that our business decisions are guided by a true sense of integrity.

Our Code of Business Conduct and Ethics was created in this spirit and sets out the ethical guidelines under which we conduct our day-to-day actions. When dealing with ethics, there are no specific rules that can apply to every situation. This Code is a tool to support our entrepreneurial spirit and to guide our thinking and our behavior. It is everyone's responsibility to comply with it.

SAVE TEETH. SAVE LIVES.

Haleh Abivardi and Golnar Abivardi Co-CEOs and Co-Founders

Our Ethical Principles

At vVARDIS Holding AG and its subsidiary companies (collectively "**vVARDIS**"), we are committed to conducting our business in compliance with the laws and regulations of the countries in which we operate, and we believe that taking an ethical approach is the only way to operate in the best interest of our customers, patients and the communities we serve.

Our Code of Business Conduct and Ethics applies to all of us. This means not only to all employees (both permanent and temporary) and Board members, but also to our contractors and distributors.

We wish to foster a culture where employees can speak out: should you have the feeling that something is wrong, do not be afraid to talk about it. To make sure all matters are taken into consideration, we offer you the ability to sound the alarm through our dedicated reporting tool that enables you to anonymously report any such concern: vvardis.ethicspoint.com.

Our Ethical Safeguards

Our Code of Business Conduct and Ethics

Our Code of Business Conduct and Ethics applies to all employees (both permanent and temporary), contractors and distributors. This Code is an integral part of our governance and compliance organization, in order to ensure that vVARDIS complies with applicable U.S., Swiss and international laws and regulations. This Code is not exhaustive, and its content may be updated from time to time. Our Code of Business Conduct and Ethics supplements but does not replace our other policies.

Reporting of Any Illegal or Unethical Behavior

We encourage a culture of transparency, openness and trust where everyone can raise concerns. Should you have a concern or the feeling that something is wrong, do not keep it to yourself.

We have set up a reporting tool that can be used by any employee, contractor or distributor and is available on the following website: vvardis.ethicspoint.com.

Alternatively, you may contact the General Counsel if you have any concern. Reports can be made anonymously. All reports will be treated confidentially to the extent possible.

Our Ethics Committee

Our Ethics Committee has been set up to monitor the appropriate implementation of the Code of Business Conduct and Ethics and the EthicsPoint tool, lay down appropriate guidelines based on principles this Code defends and be proactive in assessing ethical issues linked to new projects or products, when required. Membership of our Ethics Committee consists of four permanent members and contributors from QA/RA, Human Resources, Finance, and Legal departments.

Our Ethics Committee guarantees strict confidentiality in handling alerts and make sure that employees who report a misconduct or a breach, in all good faith, will not be subjected to any form of retaliation (i.e. no action will be taken against them).

Our Ethics Committee acts under the supervision of the Nomination and Compensation Committee of our Board of Directors, or, in the case of accounting, internal accounting controls or auditing matters, the Audit Committee of our Board of Directors .

Reporting to a Government Agency

Employees have certain protections for cooperating with or reporting legal violations to governmental agencies or entities and self-regulatory organizations. Nothing in this Code is intended to prohibit any employee from disclosing or reporting violations to, or from cooperating with, a governmental agency or entity or self-regulatory organization, and employees may do so without notifying the Company. The Company may not retaliate against an employee for any of these activities, and nothing in this Code or otherwise requires an employee to waive any monetary award or other payment that he or she might become entitled to from a governmental agency or entity, or self-regulatory organization.

Commitment to Our Stakeholders

Our Company, Employees, Contractors and Board Members

We owe all those who work for us respect and fair treatment. Wherever we are, we want to provide a professional and safe working environment fostering a culture of respect, trust, collaboration, diversity, freedom of expression and growth.

Our working environment is free from discrimination and harassment. We provide equal employment opportunity to all applicants and we do not tolerate any form of harassment or discrimination on the basis of race, color, religion and belief, national origin, gender, age, marital status, sexual orientation, disability or perceived disability, pregnancy, or medical conditions. Harassment and discrimination may be subject to disciplinary penalties, and in many countries to criminal proceedings and termination of employment.

We strive to avoid conflicts of interest. We must conduct ourselves in an honest and ethical manner and act in vVARDIS' best interest. We must endeavor to avoid situations that present a potential or actual conflict between our individual interest and that of our company. A “conflict of interest” occurs when a person’s private interest interferes in any way, or even appears to interfere, with the interests of our company. Situations involving a conflict of interest may not always be obvious or easy to resolve. You should report actions that may involve a conflict of interest to the Legal Department. In order to avoid conflicts of interests, employees, officers and directors must disclose to the General Counsel any material transaction or relationship that reasonably could be expected to give rise to such a conflict, and the General Counsel shall notify the Audit Committee of the Board of Directors of any such disclosure. In the event that an actual or apparent conflict of interest arises between the personal and professional relationship or activities of an employee, officer or director, the employee, officer or director involved is required to handle such conflict of interest in an ethical manner in accordance with the provisions of this Code.

We must comply with all applicable laws and regulations. We are strongly committed to conducting our business affairs with honesty and integrity and in full compliance with all applicable laws, rules and regulations. No employee, officer or director shall commit an illegal or unethical act, or instruct others to do so, for any reason.

We cannot trade in securities using non-public information. Using non-public information to trade in securities, or providing a family member, friend or any other person with non-public information, is illegal. All non-public information should be considered inside information and should never be used for personal gain. You are required to familiarize yourself and comply with our Policy Against Insider Trading.

We are all ambassadors of vVARDIS. When posting content on social media platforms, speaking to journalists, speaking at events or conferences, etc. We should all remember that what we say is public and may be recorded, forwarded or shared with others.

The Patients of our End User Providers

We produce quality products. Compliance with quality standards is not only important for our business, it is also critical for the patients of the end user providers of our products (Providers). We are committed to providing the highest quality of products and services to our customers and Providers.

We fairly promote and market our products and services. Promoting our products and services with integrity and transparency is essential to determine our collaboration with customers and Providers. Many regulations exist to protect patients from inaccurate or unfair promotion: we sell our products through accurate and truthful communications about their efficacy, quality, safety and price.

We pledge to respect the privacy of personal data and to keep it safe. As part of our business, we process and store personal and sensitive data on a daily basis. Each of us respect and protect the privacy and security of this data and any related information. Our procedures and systems, based on the applicable requirements of GDPR and HIPAA, strictly limit access to and use of the data of our customers, and Providers and their patients.

Our interactions with healthcare professionals. We build commercial relationships with our customers, Providers and more broadly with the healthcare community. We must never bribe or offer other forms of compensation to gain business we would not have won without that. We should all be very careful: what we might consider as courtesies in other sectors may not be appropriate when interacting with healthcare professionals. Our interactions with healthcare professionals are governed by internal rules based on U.S., E.U., Swiss standards and local requirements when stricter. Refer to our Anti-Corruption Policy for more details.

Our Shareholders

We share full and accurate information. We provide full and accurate information in our public disclosures, in all material respects, about our financial condition and results of operations. Our reports and documents filed with or submitted to the U.S. Securities and Exchange Commission and NYSE and our other public communications must include full, fair, accurate, timely and understandable disclosure.

We ensure financial integrity. We conduct our business in compliance with all laws and regulations. We apply best practices of internal controls and corporate governance to ensure the integrity of financial and accounting information and to prevent fraud. We make sure that we, as well as third parties acting on our behalf, do not get involved in situations that could prove to be fraudulent or malicious.

Our Business Affiliates and Competitors

We do not tolerate corruption. We strictly prohibit corruption and we ensure our business operations around the world comply with applicable anti-corruption laws. We have a zero-tolerance policy when it comes to offering, promising, giving or accepting money or anything of value (including bribes, kickbacks, illegal rebates, gifts, entertainment or travel expenses.) to government officials, political parties or politicians, trade unions, employees or representatives of another company or their family members. In addition, we refuse facilitation payments, i.e. the payment of an unofficial sum of money with the aim of facilitating, guaranteeing or speeding up the execution of an administrative decision (work permit, customs, etc.). We all have a vital role to detect and report wrongdoing to management or through our EthicsPoint tool. Refer to our Anti-Corruption Policy for more details.

Our perception matters for gifts and entertainment. There is one common practice which is often less clear-cut, and which requires each one of us to be extra vigilant: giving and receiving gifts

and entertainment. We must all refuse invitations, entertainment, and gifts that are intended to, or might be perceived to unfairly influence a business decision. When confronted with an ambiguous request or proposal, we shall notify our line manager or report it through our EthicsPoint tool, refer to internal policies and if necessary, take advice from our Compliance Manager. Refer to our Anti-Corruption Policy for more details.

We respect fair competition. We believe that free, open and fair competition is the best way to achieve progress that benefits our mission. We respect all our business affiliates and competitors and we intend to comply with fair competition and antitrust laws in our dealings. We refuse to participate in any illegal dealing arrangements and practices which restrict competition or are discriminatory to other market operators.

We have a responsible supplier selection. We select suppliers and sub-contractors who share the values and principles of our Code of Ethics. Our relationships with them are based on fairness and loyalty and are integral to the long-term success of our business. We will not continue to work with a supplier who is repeatedly not meeting our expectations, values and principles.

Our Community

We do not contribute to political activities. We do not finance political life (parties, politicians, institutions) in any country. We respect our employees' right to participate in political life, but as a company, we do not engage company's funds and resources for personal political activities.

We may offer non-commercial sponsorship in line with our values. Our potential sponsorships must be justified and transparent. Any planned sponsorship must be approved by the Executive Committee. We ensure that charitable contributions and sponsorships, if any, are never used as a substitute for bribery.

Waivers and Amendments

Any waiver (including any implicit waiver) of the provisions in this Code for executive officers or directors may only be granted by the Board of Directors or a committee thereof and will be promptly disclosed to our shareholders. Any such waiver will also be disclosed in our annual report on Form 20-F. Any waiver of this Code for other employees may only be granted by the Ethics Committee. Amendments to this Code must be approved by the Board of Directors and will also be disclosed in our annual report on Form 20-F.

Review

The Nomination and Compensation Committee of the Board of Directors shall review this Code annually and recommend any changes to the Board of Directors.

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