



INTEGRITY AND EXCELLENCE

**Worldwide
Business Standards**

“We believe that our high standards of ethical conduct have been one of the keys to why we excel in our business.”



Dear Team Schein Members



Henry Schein is a global solutions company providing dental and medical products, technology, and other value-added services to health care professionals, health care entities, and other customers. Since our founding as a corner drugstore in Queens, New York in 1932, the Henry Schein heritage and corporate culture, as reflected in Team Schein Values, have fostered an overriding commitment to high standards of integrity and excellence.

Our Corporate Charter states:

- To our customers, we provide the best quality and value in products and services, helping our customers, as trusted advisors and consultants, to deliver quality health care to patients, efficiently operate and grow their practices, and increase their financial return and future security
- To our shareholders and venture partners, we endeavor to provide continued growth and profitability, resulting in a superior return on investment
- To Team Schein, we foster an entrepreneurial environment, offer exciting opportunities for personal and professional growth, and treat each individual with respect and dignity
- To our suppliers, we create an environment which enables us to grow our respective businesses in the spirit of partnership, each making a fair profit
- To society at large, we act in a socially responsible manner to further humanitarian relief and disaster response, increase access to health care among underserved populations, strengthen wellness programs and volunteer activities, enhance health care advocacy and education, positively address environmental concerns, and maintain high standards of corporate governance.

We believe that our high standards of ethical conduct have been one of the keys to why we excel in our business and live up to the aspirations detailed in our Charter. Indeed, Henry Schein's excellent reputation is paramount to its business. Although we have a responsibility to our shareholders to run a profitable business, we cannot afford to lose or tarnish even a shred of our reputation.

We recognize that maintaining our high ethical standards requires more than good intentions. Each of us has a duty to uphold these standards. We must adhere to the legal and regulatory requirements that govern all aspects of our business, including the procurement, manufacture, marketing, sale, and distribution of our products and services as well as our external financial reporting. Ethical business practices extend to all levels and positions within our Company. Our actions must reflect high standards of uncompromising honesty, integrity, and ethical behavior in all aspects of our operation. The *Worldwide Business Standards* define the values and responsibilities that apply to each of us as representatives and leaders of Henry Schein.

While we have refreshed the “look and feel” of our Worldwide Business Standards, these standards of conduct are not new to our Company and simply embody and reinforce the many policies and practices that have existed within our Company for decades.

The Worldwide Business Standards apply to every Team Schein Member — employees and officers of Henry Schein and its subsidiaries and affiliates, members of our Board of Directors, as well as contractors and third-party intermediaries who support our Company. The Worldwide Business Standards apply to every Team Schein Member's interactions with third parties — whether they are health care professionals, health care entities, consumers, government agencies, notified bodies, or others. The Worldwide Business Standards provide guidance and resources to help resolve questions about appropriate conduct in the workplace, but they are not substitutes for a Team Schein Member's sense of honesty and integrity and good judgment. Protecting the integrity of our Company for our customers, our suppliers, our business partners, our shareholders, our society at large, and ourselves will help ensure that we achieve the excellence we strive for every day.

Thank you for doing business every day in accord with our Worldwide Business Standards.

A handwritten signature in black ink, reading "Stanley M. Bergman".

Stanley M. Bergman
Chairman and Chief Executive Officer

Table of Contents

4-8 Introduction

Our Code of Ethical Conduct
Our Ethics & Compliance Program

9-19 Act with Integrity

The Worldwide Business Standards
Guide our Actions

Team Schein Members

Manager Responsibilities

- Lead by Example

Ethical Decision-Making

Policies and Other Requirements

Speaking Up

- What happens when the Helpline is contacted?
- Conducting an Internal Investigation
- Prohibition on Retaliation for Speaking Up

20-26 Our Responsibilities to Our Customers

Quality Assurance

Regulatory Compliance

Marketing and Sales Practices

Interactions with Health Care Professionals

Business Courtesies or Other Benefits

- What Business Courtesies May be Provided?
- What Business Courtesies May be Accepted by Team Schein Members?
- What If a Team Schein Member Receives an Unsolicited, Prohibited Gift?

27-32 Our Responsibilities to the Marketplace

Antitrust Laws and Fair Competition

Competitive Information

Business Courtesies or Other
Benefits to Suppliers

Interactions with Government Agencies,
Employees and Officials

Prohibition on Bribery and Corruption

33-41 Our Responsibilities to Our Shareholders

Financial Reporting and Records

Prohibition on Insider Trading

Protecting Assets

Confidential Information

Records Management

- Good Documentation Practices
- Records Retention

Conflicts of Interest

42-46 Our Responsibilities to Society

Environment

Political Contributions

Human Rights

Supply Chain Transparency

International Trade Regulations

47-53 Our Responsibilities to Each Other

Respectful, Safe & Healthy Workplace

- Alcohol and Drug-Free Workplace
- Equal Employment Opportunities
- Harassment in the Workplace
- Workplace Violence
- Workplace Safety

Communications and Devices

Data Protection - Privacy and Security

Social Media

54 Media Relations and External Inquiries

Investors, Analysts, and the Media

Government Inquiries

Introduction

Our Code of Ethical Conduct

Our Ethics & Compliance Program



The Worldwide Business Standards are our Code of Ethical Conduct

For over 90 years, the Henry Schein heritage and corporate culture have dictated an overriding commitment to high standards of integrity and excellence.

The *Worldwide Business Standards* (referred to as our “Standards”) set forth the principles and fundamental responsibilities of all those who represent Henry Schein’s good name. Together with *Team Schein Values*, the Standards establish the ethical and legal responsibilities that all Team Schein Members are accountable for upholding. Our Standards are a resource to guide the actions and behaviors of Team Schein Members in conducting their daily work activities.

Who is a Team Schein Member? Employees and officers of Henry Schein and its majority-owned subsidiaries and affiliates as well as members of our Board of Directors. Every Team Schein Member is responsible for reading, understanding, and complying with the Standards.

Our long history of success is grounded in doing business with honesty and integrity. Our continued success requires Team Schein Members to carry forth these principles and to conduct business truthfully, accurately, and with integrity even when faced with challenging situations. Team Schein Members are expected to read these Standards, understand them, and apply them to everyday situations *every day*.



Our Ethics & Compliance Program

Henry Schein has designated a Chief Ethics & Compliance Officer responsible for overseeing the development, implementation, and maintenance of a corporate Ethics & Compliance program, driving compliance with the Standards, and leading the global Ethics & Compliance team. The Ethics & Compliance program includes the elements of an effective compliance program, such as risk assessments, policies and procedures, learning and communications, monitoring, and auditing, supporting a speak up culture, addressing reports of potential non-compliance, and more.

The Ethics & Compliance program is supported by the Compliance Committee, comprised of senior officers of the Company, whose purpose is to assist the Chief Ethics & Compliance Officer and team with overseeing compliance with laws, regulations, the Company's Standards, and related principles, policies and procedures.



We are Global

The Standards apply to all Team Schein Members worldwide.



Our Standards apply to Henry Schein and any majority-owned entity. All references to Henry Schein, Henry Schein, Inc., or the Company in this document also refer to each of Henry Schein's domestic and global subsidiaries, as well as joint ventures where Henry Schein has management responsibility (i.e., any majority-owned ($\geq 50.1\%$) entity (e.g., subsidiary, joint venture and/or affiliate)). We also contractually require third parties conducting specific types of business activities on our behalf (e.g., third party intermediaries) to abide by these Standards too.

Team Schein Members cannot use indirect channels, such as a contractor, agent, consultant, broker, distributor, or other third-party intermediary, to perform any act prohibited by the Standards, law, or by Henry Schein policy.

Third Party Intermediaries (TPIs): TPIs are persons or entities that are relied on to conduct various aspects of business. For example, TPIs can act as sales agents and distributors to promote and sell products/services (including to health care professionals and government owned entities). Other examples of TPIs include:

- Logistics/Freight Forwarder
- Lobbyist
- Research organization
- Distributor/Dealer
- Sales Agent/Broker/Consultant
- Public Relations/Media or Marketing Agency
- Event Organizer/Travel Agency
- Customs Agent/Broker
- Importer/Exporter



In addition to following these global Standards, Team Schein Members must also follow the laws of the countries and jurisdictions where Henry Schein does business. Our guiding principle is that where the Standards are more restrictive than local law, Team Schein Members should apply the Standards. If compliance with the Standards appears to conflict with local law or practices, Team Schein Members should discuss their concerns with the Chief Ethics & Compliance Officer or a member of the Ethics & Compliance team. The fact that in some countries certain conduct is legally prohibited, but violations are not enforced or subject to public criticism or censure, will not excuse an illegal action by a Team Schein Member. It is the responsibility of each Team Schein Member to comply with the Standards and to take action or report to management when he or she becomes aware of any acts that are illegal, unethical, or otherwise in violation of the Standards.

If a Team Schein Member feels that a question, complaint, or concern is not being addressed or addressed appropriately by their management, it is the Team Schein Member's duty to bring it to the attention of the Chief Ethics & Compliance Officer, any member of the Compliance Committee or Henry Schein's confidential Compliance Helpline.

Team Schein Members who fail to comply with the Standards, the law, regulations or policies, including not reporting known illegal or unethical activities, may be subject to disciplinary action up to and including termination of employment where permitted by law.

Act with Integrity

Worldwide Business Standards Guide our Actions

Team Schein Members

Manager Responsibilities

Ethical Decision-Making

Policies and Other Requirements

Speaking Up

The Worldwide Business Standards Guide our Actions

The Standards capture Henry Schein's long-standing commitment to acting with integrity and promoting Henry Schein's and each individual Team Schein Member's responsibilities to customers, colleagues, suppliers, shareholders, and society for:

- Honest and ethical conduct, including the ethical handling of actual or perceived conflicts of interest between personal and Company-related relationships, activities, and interests
- Compliance with applicable governmental laws and regulations
- Complete, accurate, and timely internal and external reporting and communications
- Prompt internal reporting of inappropriate behavior or conduct
- Accountability for adherence to the Standards

The Standards are not intended to address every ethical, legal, and regulatory situation that a Team Schein Member might face – it would be impractical to try to do so – and are not a summary of all laws, regulations, or policies that apply to Henry Schein or Team Schein Members. They are not a substitute for good judgment either. But when it comes to the entrepreneurial philosophy for which Henry Schein is so well known, the Standards should be integrated and guide the initiatives of Team Schein Members at all times.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Team Schein Members

Each Team Schein Member must always act with integrity. The successful application of the Standards depends on each Team Schein Member accepting the responsibility to act honestly and ethically. Dishonest or unethical behavior is not tolerated no matter when, where, or how it occurs. These Standards assist Team Schein Members with resolving a variety of ethical and legal issues that may arise in the course of conducting our business.

If a Team Schein Member has any question on interpreting or following these Standards, or on any other policies or procedures adopted by Henry Schein, it is the Team Schein Member's responsibility to consult with his or her supervisor or a member of the Ethics & Compliance team.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Manager Responsibilities

Lead by Example

Our leaders, supervisors, and any other Team Schein Member who manages others (collectively “Managers”) have increased responsibility and are accountable for leading by example, modeling our Team Schein Values, living the principles in these Standards, and inspiring their teams to live these Standards by acting in a professional, honest and ethical manner.



“Manager” is a role not a title and includes anyone who manages people.

There are many ways that Managers can demonstrate their commitment to our Standards. Managers are expected to be positive role models by demonstrating all of these behaviors:

- Recognizing and rewarding integrity by Team Schein Members when they apply ethical decision-making principles to solve a situation
- Creating an open environment where Team Schein Members are comfortable speaking up
- Ensuring their team completes required Compliance Learning modules
- Seeking guidance by escalating issues when they arise
- Modeling ethical leadership for their team and peers
- Listening and responding to concerns when they are raised
- Making sure that no one who speaks up suffers retaliation
- Enforcing our Standards consistently and holding people accountable for their behavior
- Never asking or pressuring anyone to do something against our Standards, policies or the law
- Using the Compliance toolkits to discuss compliance-related topics during staff meetings
- Seeking help in resolving and escalating issues to Legal or the Ethics & Compliance team

Remember, if you have any questions about any policy or situation, ask. Always ask.

Ethical Decision-Making

At Henry Schein, we value our ability to focus and get things done, but the pursuit of ambitious business goals can never be a reason or excuse for a Team Schein Member to disregard or lose sight of ethical decision-making. Acting with integrity means doing the right thing even when no one is looking.

Acting with integrity is not only about following the rules, but also about making the right decision in the absence of a rule. The following Ethical Decision Tree can help Team Schein Members decide whether they can act on something they think may be questionable.

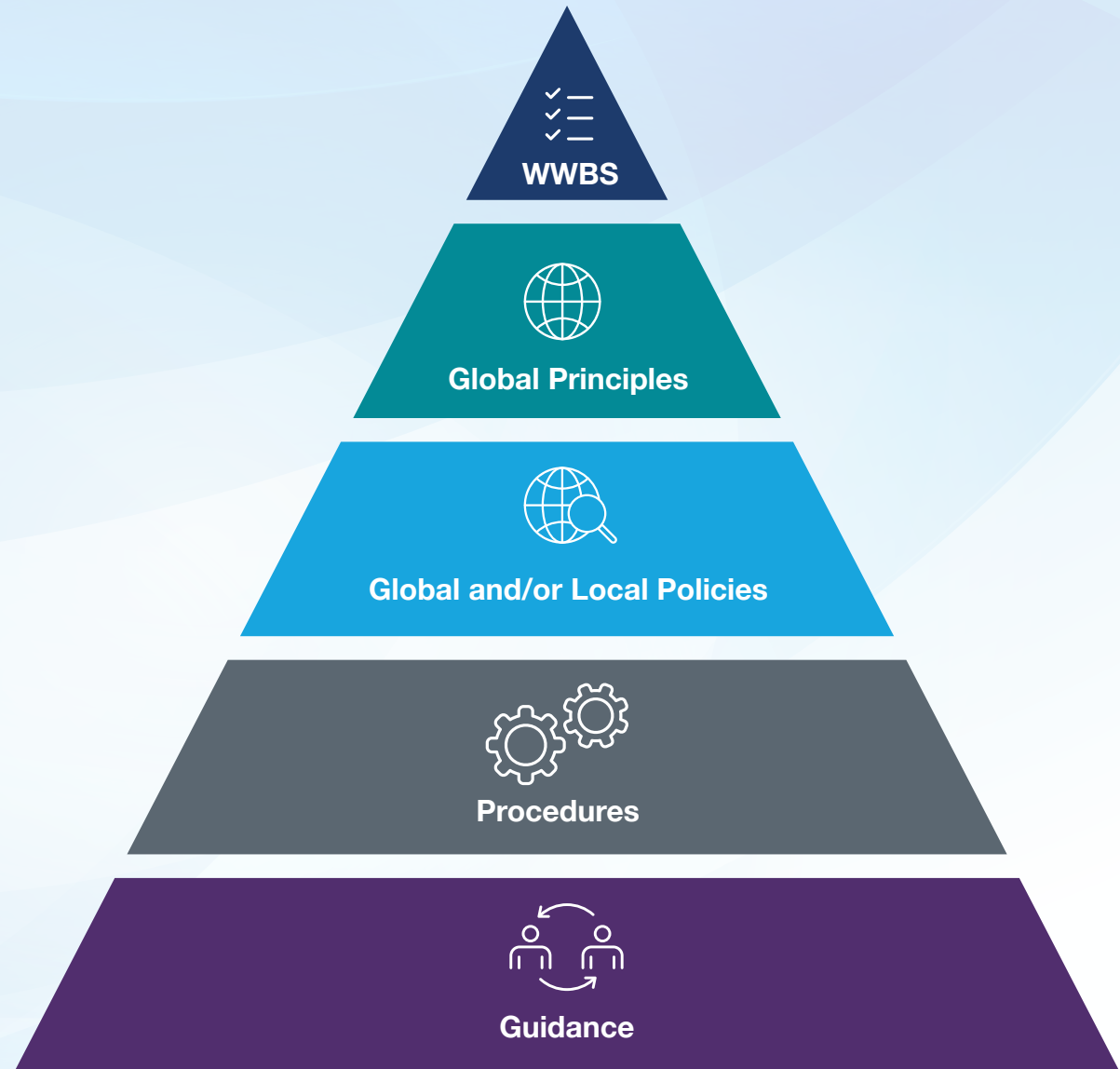
Unsure About What Is the Right Thing To Do?

Here's how to think it through.



Policies and Other Requirements

Topics covered in these Standards may be further explained in and governed by global principles, global or local policies (collectively "Policies"), as well as procedures, and other memoranda. Team Schein Members are accountable for consulting and following these Policies and asking questions of their Manager if anything is unclear. Policies are available on the Company intranet and Compliance Learning Center. Policies are reviewed and updated periodically so it is important to access the current version.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Speaking Up

Team Schein Members are encouraged to ask questions, raise concerns and voice opinions when compliance issues arise. When seeking to report a suspected violation of the Standards, Policies or the law, a Team Schein Member's first point of contact is usually their immediate manager or next level manager. But there are other reporting channels available such as Human Resources, Legal or the Ethics & Compliance Department.

Additionally, a global, confidential Compliance Helpline is available 24 hours a day, 7 days a week. Reports may be submitted online (<https://henryschein.integrityline.com/>) or via a local, toll-free phone number. Translation services are available for non-English reports.



Reports may be submitted anonymously and should include as much detail as possible to facilitate a review. A Reporter will be assigned a report number that is needed to access their report in the future — so save it. Reporters should check back with the Helpline periodically to respond to questions or requests.

The Helpline is available to all Team Schein Members, customers, suppliers and other third parties anywhere in the world to report suspected violations of our Standards, Policies or law.

The Helpline is a valuable resource to be used in good faith, but it is not a tool to submit a knowingly false report. Using it this way may subject the reporter to disciplinary action up to and including termination of employment or other action as appropriate.



What Happens When the Helpline is Contacted?

Reports made by phone are answered by an independent third party with expertise in handling hotline calls. An operator will ask questions, patch in a translator if necessary, and give the reporter a call back date. Reports made online are submitted electronically. Any report made is forwarded to the Ethics & Compliance team and designated Team Schein Members to assess and assign for investigation. Reports will be shared only with a limited number of investigators and senior leadership who will review and assist in the process.

If sufficient details are provided alleging a potential violation, the reports will be promptly investigated and, if warranted, remedial action will be taken.



The Helpline may be accessed by phone, using toll-free telephone numbers based on the country from which a Team Schein Member is calling. In the United States and Canada, Team Schein Members can call 1-800-381-4650.



For a [directory of phone numbers](#) for all other countries, please use this QR code with an internet enabled device.



Or Team Schein Members can use this QR code to access the Helpline from their mobile device.



Conducting an Internal Investigation

Any information provided by a reporter will be kept confidential, except as needed to conduct a full and fair investigation or as otherwise required by local law. The Ethics & Compliance team may work with other departments as necessary during an investigation. Investigations involve fact-finding through an examination of relevant records and documents and/or interviews of persons who may have knowledge of the facts related to the reported concern or issue.

All Team Schein Members must cooperate with internal investigation requests and interviews, be truthful, and preserve records. The time to conduct an investigation varies and may take several weeks to months before conclusions are reached. To the extent improper conduct in violation of the Standards is found to have occurred, appropriate action will be taken.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Prohibition on Retaliation for Speaking Up

It is against law and Company policy for a Team Schein Member who reports an ethical or legal concern in good faith to be subject to retaliation for speaking up. Henry Schein treats all claims of retaliation seriously, investigates them and, if substantiated, takes appropriate disciplinary action. Any Team Schein Member witnessing or experiencing retaliation should contact the resources listed in the Standards.

“In good faith”: Reporting a sincerely held belief that a violation of the *Worldwide Business Standards*, the law or a Henry Schein policy has occurred, and providing honest and accurate information – even if an investigation later determines there was no violation.



For more information:

- Policy on Policies (CC-001)
- Ethics and Compliance Program Policy (CC-003)
- Speak Up and Non-Retaliation Policy (CC-004)
- Internal Investigations Policy (CC-010)
- EMEA Annex to Internal Investigations Policy (CC-010)

Our Responsibilities to Our Customers

Quality Assurance

Regulatory Compliance

Marketing and Sales Practices

Interactions with Health Care Professionals

Business Courtesies or Other Benefits



“To our customers, we provide the best quality and value in products and services, helping our customers, as trusted advisors and consultants, to deliver quality health care to patients, efficiently operate and grow their practices, and increase their financial return and future security.”

— Henry Schein Corporate Charter

“We believe that conducting ourselves with the highest degree of ethics and integrity is foremost in driving a successful business.”

— The Ethics Value of Team Schein

Quality Assurance

Henry Schein is committed to distributing, designing, manufacturing, relabeling, and marketing only high-quality health care products, technology solutions and services. It is our policy to consistently exceed customer expectations by providing safe and effective products, supported by the finest customer service team. Whenever a Team Schein Member has any concerns about the quality or safety of a product, solution, or service, he or she should promptly contact the Quality Assurance Department. Potential violations may also be reported through other reporting channels.



Quality Policy: It is every Team Schein Member's responsibility to meet customer requirements and applicable regulatory requirements, and to help drive continuous improvement of our quality management systems to ensure their effectiveness.

Regulatory Compliance

Henry Schein is subject to many country-specific and local regulations that are enforced by numerous agencies. Team Schein Members must ensure compliance with applicable laws relating to product quality, safety, and registration, including requirements for complaint documentation, adverse event reports, and appropriate licensure. Likewise, the Henry Schein facilities that provide distribution and/or manufacturing of our products are obligated to maintain compliance with workplace safety and environmental standards as well as applicable facility certifications.

Whenever a Team Schein Member has any concerns about regulatory compliance, he or she should promptly inform a supervisor, or escalate to the Quality Assurance and Regulatory Affairs Department or through other reporting channels.

Adverse Event: Any untoward medical occurrence (e.g., rash, hives, stroke, injury requiring surgery, hospitalization) in a patient temporally associated with administration of a pharmaceutical product or use of a medical device.

Product Quality Complaint: An allegation of deficiencies related to the product's identity, strength, quality, potency, purity, labeling or packaging. Complaints about potential counterfeit products should be reported as a product quality complaint.

Marketing and Sales Practices

Henry Schein is confident in its ability to succeed in a fair, open, and competitive marketplace. Henry Schein's business relationships are based on trust, transparency, and accountability. We never offer or accept any form of payment or incentive intended to improperly influence a business decision.

Team Schein Members responsible for merchandising, sales, marketing, and business development must be familiar with local, regional, and country-specific laws that govern advertising and competitive practices. Product, service, and pricing claims or disclosures, or comparisons with competitors' products must be accurate, truthful, not misleading and consistent with regulatory approvals for products.



Interactions with Health Care Professionals

Henry Schein is committed to ethical interactions with health care professionals and health care entities. Strong working relationships with health care professionals are essential to Henry Schein's success and to continued improvement and innovation in health care.

Henry Schein regularly consults with experienced health care professionals who render services to Henry Schein in various fields that may include training and education on the safe and effective use of products. Many of these health care professionals are also customers who may recommend or use our products and services.

Our collaborations with health care professionals are closely regulated by government authorities and subject to additional scrutiny, including applicable transparency law requirements. As such, we must strictly adhere to the following rules:

- Henry Schein does not use interactions with health care professionals to improperly influence product, purchasing or coverage decisions or to reward or induce the use or recommendation of our products.
- All product decisions should be made in the best interests of the patient, and not in return for any kind of payment or other advantage from the Company.
- Henry Schein selects and engages health care professionals for consulting services solely based on their qualifications, experiences, skills, and expertise to address an identified need, not based on any actual or potential Henry Schein business.
- Henry Schein compensates health care professionals for legitimate services provided based on fair market value principles.

All arrangements with health care professionals must be properly approved, appropriately documented, and reported consistent with applicable transparency requirements.

Business Courtesies or Other Benefits

Henry Schein recognizes that there may be times when modest hospitality or gifts may be one aspect of establishing an effective relationship with private-sector customers and suppliers. Throughout the world, however, one principle is common and clear: no payment, gift, favor, or hospitality should be accepted or provided if it will obligate or appear to obligate the recipient or influence the recipient to misuse their position or obtain any improper advantage. These may be considered bribes and this principle is embodied in anti-corruption laws enacted around the world. Team Schein Members are expected to comply fully with all applicable anti-bribery and anti-corruption laws.

A “bribe” can be anything of value given to another person (especially a government official) to gain an undue business advantage. It may be a direct or indirect offer, authorization, gift, or promise to give anything of value with the intent to obtain or retain business or gain any improper advantage, or something to which Henry Schein is not clearly entitled, such as a price increase approval, improper influence on a decision to purchase product at a government institution or commercial business, contract award, grant of operating permits, product use/registration approval, favorable court decision, or tax dispute settlement.



What Business Courtesies May be Provided?

Occasional and modest gifts and moderate hospitality (i.e., lunch or dinner) may be provided if they are reasonable complements to business discussions and meetings, and not against the law or any rules or regulations that apply to the Company and consistent with Company policy. Offering or providing any form of payment, bribes, or kickback purposefully (in any form, whether the payments are direct or indirect) to induce or reward the referral or purchase of any product or service is absolutely prohibited in all circumstances. The foregoing does not prohibit discounting goods and services in the normal course of business.

What Business Courtesies May be Accepted by Team Schein Members?

Accepting occasional gifts and hospitality of modest value may be appropriate in developing business relationships. Acceptable gifts include occasional gifts of low value (e.g., flower and food arrangements, promotional items, etc.) for socially accepted holidays (e.g., Christmas, Easter, Hanukkah, Eid, Diwali, etc.). Gifts, entertainment or hospitality should further the business interests of Henry Schein, and not be lavish or in excess of the generally accepted business practices of one's country.

Gifts, entertainment, hospitality or other things of value may not be accepted to the extent that decision-making or actions affecting Henry Schein might be improperly influenced. Certain gifts such as lavish entertainment or cash/cash equivalents should be avoided altogether and are never allowed.

What If a Team Schein Member Receives an Unsolicited, Prohibited Gift?

Always inform the sender that the gift is not permissible under Henry Schein's policy. Recipients of prohibited gifts or favors should let their Manager know and return the gift or donate it to charity. If a gift is perishable or impractical to return, the Manager may divide it among the entire department.

Never accept gifts, entertainment, hospitality or other items of value that create a real or perceived conflict of interest or improperly influence decisions or actions.

For more information:

- Sunshine Act and US Transparency Policy (CC-005 – US Only)
- Marketing Code of Conduct (CC-006)
- Business Gifts Policy (HR-009)
- Government Investigations Policy (LG-007)
- Adverse Event and Product Quality Complaint Reporting (RA-002)
- Promotional Labelling and Advertising Policy (RA-013)

Our Responsibilities to the Marketplace

Antitrust Laws and Fair Competition

Competitive Information

Business Courtesies or Other Benefits to Suppliers

Interactions with Government Agencies,
Employees and Officials

Prohibition on Bribery and Corruption



“To our suppliers, we create an environment which enables us to grow our respective businesses in the spirit of partnership, each making a fair profit.”

— Henry Schein Corporate Charter

Antitrust Laws and Fair Competition

Team Schein Members are expected to comply fully with all applicable antitrust laws in carrying out the business of the Company. Antitrust laws may affect a number of the activities of the Company, and Team Schein Members should be knowledgeable as to their impact in the day-to-day conduct of our business. Penalties for violations of the antitrust laws can be substantial and include fines and imprisonment. Penalties can be imposed on Henry Schein as well as on Team Schein Members who engage in illegal activities.

Under antitrust laws, agreements and conduct that restrict competition may be illegal. For example, agreements between competitors to fix prices for services or products, or to allocate customers or territories among competitors, are always illegal and should not be entered into by any Team Schein Member. In addition, due to the sensitive nature of these topics, Team Schein Members should not enter into discussions related to such matters with any competitors.

Some types of arrangements, such as exclusivity arrangements with a supplier or customer, restrictions on the resale of items, arrangements that involve packaging the sale or lease of one product based on the sale or lease of another, and pricing differently to competing customers may also have legal implications depending on the circumstances. Team Schein Members should consult with the General Counsel's office before engaging in activities that might have legal implications under the antitrust laws.

Price Fixing



Agreeing with a competitor to raise, lower, or hold prices firm or otherwise agreeing on competitive terms

Market Division



Carving up territories, customers, or markets among competitors

Bid Rigging



Coordinating bid details with competitors

Restriction on Product Choice or Customer Benefits



Agreeing with a competitor to limit product choice or customer benefits

Boycotts



Agreeing with a competitor to avoid doing business with certain customers, suppliers, or others

Monopolization



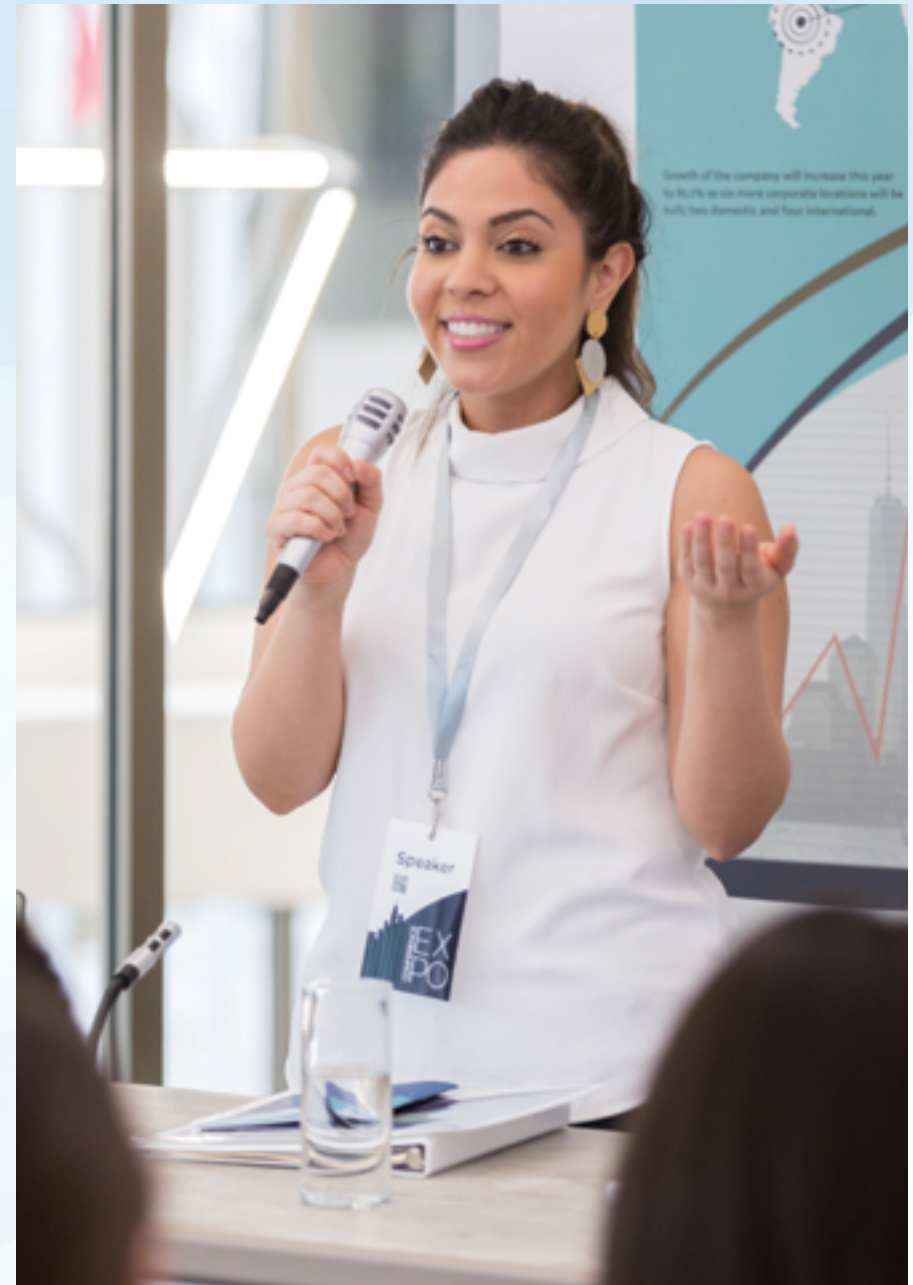
Leveraging a dominant market position to unreasonably impose exclusive dealing terms on customers, such as pricing, discounts, rebates or other terms.

Competitive Information

Special care must be taken in business contacts with Henry Schein's competitors. Many of these contacts, such as attendance at business shows or trade seminars and participation in trade associations, are acceptable as long as proper procedures are followed. Team Schein Members who attend a professional or trade association meeting or belong to a trade association where it is possible that confidential or non-public information regarding the Company or its competitors may be discussed or made available should first clear participation in such associations or activities with the General Counsel's office.

Although it is in the Company's interests to obtain information about competitors, that information generally should not be obtained directly from the competitors themselves. No improper means should be used to acquire a competitor's trade secrets or confidential information, including the use of customer credentials by Team Schein Members. Information about prices is especially sensitive. Although published pricing information of competitors may be obtained through normal publicly available channels, Team Schein Members should avoid discussing any price information with competitors or obtaining nonpublished price information from them.

In contacts with competitors, Team Schein Members should avoid discussing pricing policies or analyses, costs, profits or profit margins, inventories, market shares or markets, customers, distribution and supply practices, market surveys, and studies or any other competitive or proprietary information. Agreements on or discussions of these subjects with competitors can be illegal.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Business Courtesies or Other Benefits for Suppliers

As is the case with customers, there may be times when modest gifts and moderate hospitality may be one aspect of establishing an effective relationship with suppliers. The standards discussed previously under “Our Responsibilities to Our Customers” also apply to business courtesies or other benefits in the case of suppliers.

Interactions with Government Agencies, Employees and Officials

Team Schein Members must take extra care when dealing with government officials. When working with government employees, Team Schein Members remain compliant by:

- Not offering, promising, or giving anything of value to gain a business advantage
- Not offering or accepting bribes or kickbacks, including cash, gifts or entertainment
- Not providing payments we believe will be used by third parties to influence government officials
- Recording all payments and receipts completely and accurately

If a Team Schein Member is placed in a situation where they **MUST** provide a payment to a government employee due to health or safety issues, they must immediately report the incident to the General Counsel’s Office when safe to do so.



Key Terms:

Bribery

An offer or promise—either direct or indirect—to give or accept something of value with the intent to gain an improper advantage or improperly influence a decision. Bribes can come in many forms, including favors, gifts, charitable or political contributions, offers to hire a government official’s relative, or even discounts that are not available to others.

Facilitation or “grease” payment

It is a payment made to a government official to expedite non-discretionary actions or services, such as: providing police protection or mail service; processing visa, permit or licensing applications; or providing utilities like phone service, water and power. These payments are prohibited at Henry Schein even if allowed under local law.

Prohibition on Bribery and Corruption

Team Schein Members must abide by all global anti-corruption laws, which prohibit companies from (1) offering or paying any money or thing of value to any foreign official, or person designated by a foreign official, for the purpose of influencing a foreign government, or (2) paying any money or thing of value to any person that a Team Schein Member has reason to believe will pass it on to a foreign official for the purpose of influencing a foreign government (i.e., “middlemen” such as third party intermediaries, representatives or consultants). Many of the host countries in which Henry Schein does business have designated the above activity to be a violation of their anti-corruption laws. Certain bribery laws have expanded the definition of who can be bribed to include private business people. Henry Schein does not allow payments of any kind to influence our counterparty’s business decisions.

Any Team Schein Member who is asked or approached to make an improper payment or provide anything of value for the purpose of influencing a foreign government official or business person must report the incident promptly to the General Counsel’s or Chief Ethics & Compliance Officer’s office. Whenever a Team Schein Member is unsure if certain conduct would violate these prohibitions, he or she must seek prior guidance from the General Counsel’s or Chief Ethics & Compliance Officer’s office before taking further action.



For more information:

- Antitrust Compliance Policy (LG-001)
- Anti Bribery and Anti Corruption Policy (CC-012)
- Business Gifts Policy (HR-009)

Our Responsibilities to Our Shareholders

Financial Reporting
and Records

Prohibition on Insider Trading

Protecting Assets

Confidential Information

Records Management

Conflicts of Interest

 HENRY SCHEIN®

NASDAQ

“To our shareholders, we endeavor to provide continued growth and profitability, resulting in a superior return on investment.”

— Henry Schein Corporate Charter

Financial Reporting and Records

Integrity is central to Henry Schein's commitment to accurate financial reporting. Henry Schein maintains a high standard of transparency, accuracy and completeness of documentation. Our financial records include all electronic and non-electronic data, files, invoices, purchase orders, expense reports, account analyses, etc. supporting all Company activities, and such records are important in meeting our obligations to colleagues, shareholders, and the public. They serve as the basis for full, fair, and understandable public reporting and communications. These records are also necessary for substantiation of compliance with tax, financial, regulatory and other reporting requirements.

Henry Schein's financial controls are designed to prevent theft, fraud and embezzlement.



Theft

Stealing money, property, equipment, inventory, opportunities, time, etc. from Henry Schein or its customers.



Fraud

A dishonest or unethical action intended to result in an advantage being given to an individual or company.



Embezzlement

Theft or misappropriation of Company funds placed in one's trust or belonging to the Company.



Remember, if you have any questions about any policy or situation, ask. Always ask.

All financial information must reflect actual transactions and conform to generally accepted or statutory accounting principles. Team Schein Members must follow all laws, regulations, and the Company Standards, Policies, and procedures. They must report and record accurately all information relating to the Company's business. All transactions must be properly authorized, executed and recorded. No false or misleading entries may be made in the books and records of the Company, and Team Schein Members may not engage in any arrangement that would result in such entries.

Accurate financial reporting means Team Schein Members should never:

- Misstate financial information in our Company's books and records
- Accelerate or defer costs in violation of generally accepted accounting principles
- "Trade load," "channel stuff," or otherwise misstate quarterly or annual sales by artificially pulling forward or delaying shipments or intentionally selling larger quantities than the customer can reasonably be expected to use in the normal course of their business
- Sign any side letter or any other document that modifies or interprets an existing customer agreement without appropriate review and approval
- Alter manufacturing numbers to meet productivity goals

Q

I want to take an extended period of time off work and asked my doctor to help me out by submitting a disability form even though I'm healthy. My friend said this is stealing but I see it as an extended vacation. Who is correct?

A

Your friend is correct. The scenario you described is a fraud against the Company (and its disability carrier) involving false medical information. Both you and the doctor could face serious consequences for this misconduct.

Q

With the holidays around the corner, I asked my friend to punch me in earlier than I arrive; every little bit helps, and it doesn't matter to a company like Henry Schein. Right?

A

No — it does matter. You and your friend are creating false records and you are committing a fraud by receiving compensation for time not worked. Both of you are subject to disciplinary action.

Henry Schein maintains a system of internal controls to ensure that all transactions are executed in accordance with management's authorization, are properly accounted for and the related records are appropriately maintained and retained according to the Company's document retention policies including being readily available for any internal or external audit or investigation.

All Team Schein Members must take appropriate steps to ensure that they and their team members comply with these internal controls, including critical controls over cash and inventory asset records and safeguarding of those underlying assets, through compliance with Company banking and disbursement control standards and policies and key controls over the maintenance of and changes to master banking, supplier and customer master file records.

Further, all Team Schein Members must cooperate and be truthful with internal audits (which may be conducted by internal or external resources on behalf of departments such as Internal Audit and Ethics & Compliance or external audits conducted by our statutory external auditor).

Prohibition on Insider Trading

In the course of employment with Henry Schein, Team Schein Members may come into possession of confidential and highly sensitive information about Henry Schein or other publicly held companies. Much of this information has the potential to affect the market price of securities issued by the companies involved. National and state securities laws and regulations prohibit Team Schein Members from insider trading. Team Schein Members, as well as such person's family members (including spouses, parents, children, grandparents, grandchildren, siblings, or any relationships through marriage or adoption), members of a household, and any entity controlled by such person must not (i) buy, sell or otherwise trade in Henry Schein securities or in securities of competitors or other companies (either personally or on behalf of others), in each case, while in possession of material non-public information; or (ii) communicate material non-public information to others in violation of law.

To limit the potential exposure of Henry Schein and Team Schein Members to insider trading liability, Team Schein Members should not discuss material, nonpublic information except as required in confidential business meetings with those who require the information for their official duties.

Team Schein Members should also safeguard computer and hard copy files containing material, nonpublic information. In addition, certain Team Schein Members (who receive notification of this designation) and their families are prohibited from buying, selling or otherwise trading Henry Schein stock or other Henry Schein securities except during specified periods.

This policy continues to apply to transactions in Company securities even after a Team Schein Member has terminated employment or other services to the Company. If they are aware of material, non-public information when their employment or service relationship terminates, a Team Schein Member may not trade in Company securities until that information becomes public or is no longer material.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Protecting Assets

All Team Schein Members are entrusted with the care of numerous Company assets and have a special responsibility to protect and judiciously use them. This includes not only cash and other financial assets, but also assets like facilities and equipment, inventory, computers, sensitive data, and supplies.



Q A customer traded in their used equipment for a credit on the purchase of a new device. What do I do with the old equipment?

A The equipment is Henry Schein's property and must be handled in accordance with our inventory controls procedure.

Q A manufacturer is offering customers a credit on the purchase of new dental equipment in exchange for trading in their old unit. One customer no longer has the equipment to trade in but is interested in the deal. The sales team knows that Henry Schein has a used piece of equipment in inventory. May we give the customer our equipment so they can trade it in?

A No. The inventory belongs to Henry Schein, not the customer. Further, you would be providing something of value to the customer which may implicate local anti-bribery and transparency laws.

Q Can I help a customer sell their used equipment to another dentist and give them credit towards the purchase of a new device?

A No. This would be a conflict of interest, as Henry Schein also sells refurbished or other used equipment; the credit would also violate our credit policy.

Q A customer returned a damaged item, and I know we can't sell it. Can I take it home?

A No, even if an item is damaged or unsaleable, it is still Henry Schein property. This also includes warranty returns, which may need to be returned to the manufacturer.

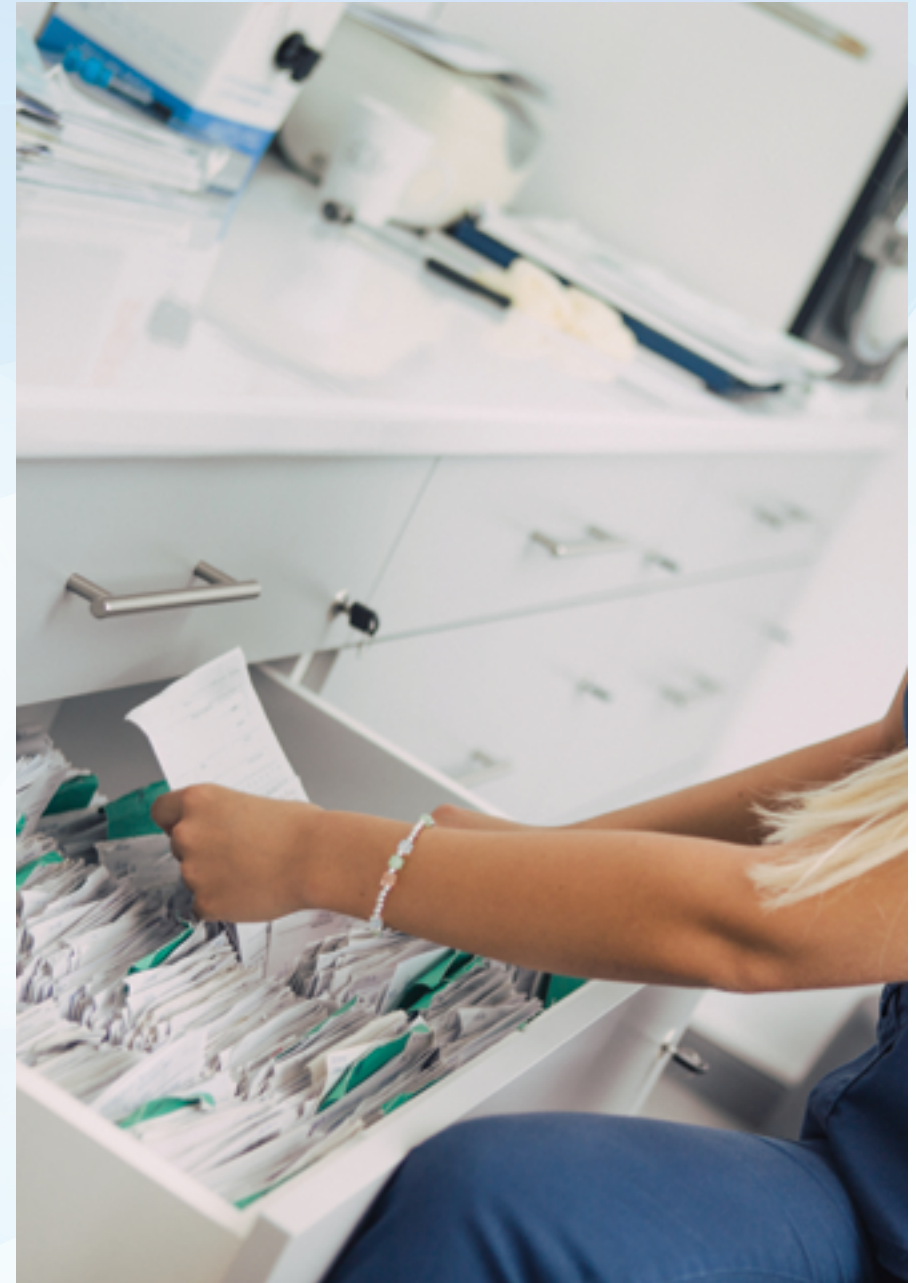
Confidential Information

All Company records and information relating to the Company and its customers and suppliers, as well as Team Schein Members, and any other matter learned by a Team Schein Member through their association with the Company, that are not readily available to the public are sensitive and may also be confidential. This is true whether or not the information is marked “confidential.”

All Team Schein Members have an obligation not to disclose any of Henry Schein’s sensitive and confidential information to anyone outside the Company and to use such information only in connection with the Company’s business.

Company-owned information (which is all data, including intellectual property, in any form, which has either been created using Henry Schein’s resources or legally acquired by Henry Schein from third parties) is considered an asset and as such, whenever and wherever it is handled or stored, it requires protection from unauthorized access, modification, disclosure, use, and destruction. Failure to adequately protect this asset risks loss of customer relationships, loss of public confidence, operational disruption, excessive costs, and competitive disadvantage.

Team Schein Members must, upon termination of their employment with the Company, return to the Company all Company assets, including without limitation, computers, cell phones, business records and all copies of sensitive and confidential information.



Records Management

What's a Business Record?

Any document (including hard copy, voice, electronic) that memorializes an “act, condition, or event” related to business. It includes emails, voicemails, instant messages, chats, text messages, presentations, spreadsheets, meeting minutes, contracts, memoranda, licenses, and more. A business record must be retrievable by the Company at a later date.

Good Documentation Practices

Every Team Schein Member creates company business records, and we all have a responsibility to ensure business records are accurate, up to date, truthful, complete, and preserved in accordance with our records retention policies. It is important to keep these things in mind when creating business records.

- Do not exaggerate, guess, or spread rumors
- Be mindful that humor, irony, harsh criticism, or sarcasm can be taken out of context
- Do not make legal conclusions unless that is your role
- Be accurate and clear, especially with sensitive or highly confidential matters
- Provide context for your observations and proposals
- Exercise caution if you have limited information or insight
- Limit your distribution to those who need to know the information

Records Retention

Team Schein Members are responsible for maintaining the accuracy, confidentiality and security of all of their records. Henry Schein is subject to legal and regulatory requirements regarding the retention and disposal of certain records. In the event the Company receives any notice of pending or potential litigation, government investigation or government audit, Team Schein Members should note that the regular operation of Henry Schein's records retention policies, insofar as it covers disposal of business records, should stop immediately. No Team Schein Member should ever, under any circumstances, destroy any Henry Schein business record in anticipation or contemplation of a request for such records in litigation or from any governmental agency.



Remember, if you have any questions about any policy or situation, ask. Always ask.

Conflicts of Interest

Every Team Schein Member has a duty of loyalty to Henry Schein. The duty of loyalty requires Team Schein Members to avoid actual or apparent conflicts of interest between personal and professional relationships. A conflict of interest may occur where a Team Schein Member places himself or herself or a family member in a position where personal or external interests could potentially influence or impair — or even appear to influence or impair — the Team Schein Member's ability to perform his or her job duties or his or her undivided loyalty to Henry Schein.

A conflict of interest may occur whenever Team Schein Members take for themselves business opportunities that are discovered by virtue of their position with Henry Schein or when Team Schein Members compete with the Company. All Team Schein Members have an obligation to further the interests of the Company as well as to make sure they remain free of conflicts of interest in the performance of their duties at Henry Schein.

Here are some examples of actual situations involving actual or potential conflicts of interests

- Supervising a family member, close friend or intimate partner
- Hiring or engaging the services of businesses owned by Henry Schein personnel
- Outside employment, business, advising or consulting relationship with another company that materially conflicts with the Team Schein Member's time, energy or resources for Henry Schein
- Investments in private companies that are current or potential competitors of Henry Schein or have a business relationship with Henry Schein

Questions about potential conflicts of interest can be directed to the Conflicts of Interest mailbox at ConflictsofInterest@HenrySchein.com.

For more information:

- Accounting and Financial Reporting Stewardship Policy (CA-029)
- Conflicts of Interest Policy (CC-002)
- Corporate Information and Document Classification Policy (LG-003)
- Insider Trading Policy (LG-004)
- Notice of Designated Team Schein Member Status
- Confidential Information Policy (LG-006)
- Records Management Policy (LG-011)
- Contract Review and Administration Policy (LG-015)
- Document Retention Policy (ex-US) (LG-016)
- Fraud Theft Protocol Memo (includes the contact information of Compliance Committee members)

Our Responsibilities to Society

Environment

Political Contributions

Human Rights

Supply Chain Transparency

International Trade Regulations



To Society at Large

We act in a socially responsible manner to:

Further humanitarian relief and disaster response;
Increase access to health care among underserved populations;
Strengthen wellness programs and volunteer activities;
Enhance health care advocacy and education;
Positively address environmental concerns; and
Maintain the highest standards of corporate governance.

— Henry Schein Corporate Charter

Environment

Henry Schein recognizes the critical interdependence between human health and the environment. We seek to minimize the environmental impact of our office buildings, distribution centers, and supply chain network in the communities where we operate. We encourage sustainable practices across our businesses because a healthy environment means a healthier community.

Henry Schein makes every effort to comply with all applicable environmental laws and regulations and expects Team Schein Members to support the Company’s green initiatives. We are collaborating with our partners and suppliers to mitigate the environmental impact of our supply chain such as carbon dioxide (CO₂) emissions from our distribution centers, transport activities, packaging, employee business travel and other sources, as well as the ethical and labor risks inherent in operating in and working with suppliers in higher-risk countries.



Political Contributions

Henry Schein funds or assets may not be used for national political campaign contributions. If permitted by applicable state or local law, Henry Schein’s funds or assets may be used for state or local political contributions, but only with the prior approval of the General Counsel’s office. This policy applies not only to direct contributions, but also to indirect assistance in support of candidates or political parties through the purchase of tickets to special dinners or fundraising events or furnishing other goods, services, or equipment to political parties or committees.

This policy is not intended to discourage Team Schein Members from: (a) making personal contributions to candidates, parties, or committees of their choice, or (b) being involved in politics or active in civic life. Any political or civic activities, however, must be conducted on the Team Schein Member’s own time and at the Team Schein Member’s own expense. Under no circumstances will Team Schein Members be reimbursed in any way for their personal political contributions and activities.

Human Rights

Henry Schein is committed to respecting the human rights, dignity, and privacy of the individual as recognized by the principles defined in the United Nations' Guiding Principles on Business and Human Rights. We follow applicable labor laws and respect the rights of our Team Schein Members to freedom of association, freedom of expression, and the right to be heard. We do not tolerate or condone child labor, forced labor, or human trafficking by our business partners.



Supply Chain Transparency

Henry Schein respects human rights throughout our supply chain. Our Standards, Global Supplier Code of Conduct and government contracting procedures reinforce this commitment to human rights. We require our suppliers to abide by these principles and assess compliance through monitoring and risk-based audits to help ensure they:

- Maintain and promote fundamental human rights
- Provide a workplace free from discrimination, violence, abuse and harassment
- Treat employees fairly and in compliance with all applicable laws and regulations
- Prohibit use of child, forced or prison labor
- Respect their own employees' right to freedom of association
- Provide safe and healthy working conditions to their employees, including, where applicable, housing that meets specifications of the International Labor Organization Guidelines
- Comply with all applicable environmental laws and regulations
- Eliminate conflict minerals from their supply chains for any product supplied to Henry Schein
- Take active steps to encourage a diverse workforce
- Respect the right of personnel to seek a living wage

Remember, if you have any questions about any policy or situation, ask. Always ask.

International Trade Regulations

Many laws in the United States, and in other countries in which Henry Schein operates, govern the conduct of trade across borders. Among these are laws to:

- Make sure that transactions are not being used for money laundering or other illicit purposes
- Ensure that companies do not cooperate in any way with unsanctioned boycotts
- Prohibit or restrict trade with certain countries, individuals, and entities
- Ensure that companies obtain proper licenses, registrations and customs documents before exporting, re-exporting, or transshipping certain goods, software, and technology that are controlled for export
- Ensure that companies comply with all applicable customs laws, including payment of the appropriate amount of duties on imported product, and otherwise ensure that product is imported and distributed in the United States or other countries in compliance with law

Every Team Schein Member has a duty to comply with, and to ensure that Henry Schein complies with, all such trade laws. Whenever a Team Schein Member has any concerns about trade compliance, he or she should promptly inform a supervisor, or escalate to Trade Compliance. They may also report violations to other appropriate reporting channels.



For more information:

- Supplier Due Diligence Policy (RM-006)
- Global Supplier Code of Conduct
- Prescription Drug Procurement and Control Policy (IM-007)
- Security Procedures For Controlled Substances Policy (PS-007)
- Henry Schein Statement on Human Rights
- Sustainability and Corporate Social Responsibility Report

Our Responsibilities to Each Other

Respectful, Safe & Healthy Workplace

Workplace Safety

Communications and Devices

Social Media

Data Protection - Privacy and Security

“At Team Schein, we will continue to foster an entrepreneurial environment, while offering exciting opportunities for personal and professional growth, and treating each individual with respect and dignity.”

— Henry Schein Corporate Charter

Respectful, Safe and Healthy Workplace

Alcohol and Drug-Free Workplace: Henry Schein provides a healthy, drug-free environment for Team Schein Members. The use, possession, transfer, sale, or distribution as well as being under the influence of any physical or mind-altering substance while at work is prohibited. These substances may include alcoholic beverages, non-prescribed drugs, narcotics, marijuana or any other “controlled substance” as defined by criminal statutes. TSMs must not report for work while they use any medication – even by prescription – that may impair their ability to work safely. Each Team Schein Member has a duty to notify management immediately of any violations of the Alcohol and Drug-Free Workplace policy.

Equal Employment Opportunities: Henry Schein provides equal employment opportunities without discrimination based on protected categories. Many jurisdictions have passed laws adding protected categories to this list, and the Company’s commitment extends to these categories where applicable. This is reflected in all the Company’s practices and policies regarding hiring, training, promotions, transfers, rates of pay, layoffs as well as other forms of compensation and benefits. We expect all Team Schein Members to treat each other with respect and dignity to support a work environment in which diversity and inclusion are valued.



Protected Categories:

- Alienage or Citizenship
- Age
- Color
- Creed
- Disability
- Gender identity or expression
- Genetic characteristics
- Marital status
- Domestic violence victim status
- Conviction record
- Military status
- National origin
- Pregnancy, childbirth-and pregnancy-related medical conditions (including but not limited to lactation, sexual and other reproductive health decision making, defined as including, but not limited to, the decision to use or access a particular drug, device or medical service)
- Race; traits historically associated with race (including, but not limited to, hair texture, hair type, and protective hairstyles including afros, braids, twists, locks, tightly coiled or tightly curled, cornrows, bantu knots)
- Religion
- Sex/gender; sexual orientation
- Veteran status or any other category protected by federal, state or local laws.

Remember, if you have any questions about any policy or situation, ask. Always ask.

Harassment in the Workplace: Harassment of any sort — verbal, physical or sexual — will not be tolerated. Harassment on the basis of protected categories is also strictly prohibited. Many jurisdictions have passed laws adding protected categories to this list, and the Company's commitment extends to these categories where applicable. Henry Schein is committed to providing a workplace that is free from discrimination, intimidation, hostility, violence or other offenses that might interfere with work performance. Examples of possible sexual harassment include: threats of retribution or promises of benefit in return for sexual favors, whether implicit or explicit; any unwanted physical contact or unwanted sexual advances; offensive talk about sex or sexuality; and display of pornographic or other offensive material. Team Schein Members are reminded that jokes may be just as offensive as any other type of harassment.

Workplace Violence: Henry Schein is committed to providing a safe workplace free from physical harm and threats for all Team Schein Members. Henry Schein does not tolerate any type of workplace violence, or threats of harm, committed by or against Team Schein Members. Any act of violence, intimidation or threat committed by a Team Schein Member, a Company vendor, or other individual with whom the Company has dealings will not be tolerated.

Workplace Safety: Henry Schein strives to provide a safe workplace and to promote high standards of health and safety for Team Schein Members.

Every Team Schein Member has a duty to help Henry Schein maintain a safe workplace. Team Schein Members should bring safety concerns to the immediate attention of a Manager, Human Resources Department, Global Security or other appropriate reporting channel.



Communications & Devices

Henry Schein encourages the business use of Company-sanctioned electronic communications such as voicemail, email, instant messaging chat, SMS, and telephone to enhance productivity. All business-related messages generated on or handled by those systems are considered to be the property of Henry Schein, are not the property of the individual users, and are covered by the Company's record retention policies.

While many Team Schein Members are provided electronic communications devices to use for work purposes, Henry Schein understands that some Team Schein Members use their personal devices for work related emails, phone calls, research, etc. It is important for all Team Schein Members to recognize that using their own device for business purposes should still be done consistent with any applicable company policies and within the bounds of applicable law. It is required that Team Schein Members who use personal devices for work:

- Retain those communications (or copies thereof) in accordance with the Company's records retention policies and other legal obligations
- Make those communications available to the Company immediately upon request, including by making any personal device containing those communications available and accessible to the Company
- Ensure that confidential and/or proprietary information (whether the Company's or not) is not inappropriately disclosed in any such communication

While Henry Schein's electronic communications and telephone systems are to be used primarily for business activities, incidental personal use (including social media) may be permitted as long as:

- It does not consume a material amount of time or resources
- It does not compromise data protection or security of company resources
- It does not interfere with productivity
- It does not preempt any business activity or interfere with the activities of other TSMs

Team Schein Members may not use Henry Schein's electronic or telephonic communications systems to download, store or transmit any threatening materials; knowingly, recklessly or maliciously false materials; pornographic, obscene or offensive materials; or materials that may violate any applicable law. Use of electronic communications to harass, intimidate or threaten is prohibited.

Ephemeral messaging applications (e.g., communication platforms that automatically erase the conversation between parties immediately or after a short amount of time, such as WhatsApp, WeChat, SnapChat, etc.) should not be used for business communications except as approved by the Company.



Data Protection - Privacy and Security

Henry Schein is committed to complying with applicable laws in the countries where we conduct business. Henry Schein respects the data privacy rights of Team Schein Members, our suppliers and our customers, which may vary depending on geography. Henry Schein retains personally identifiable information for business, legal or contractual purposes, and maintains the information for as long as required by law, regulation, or otherwise in accordance with policy.

Access to Team Schein Members' personnel records is limited to authorized staff with a legitimate business requirement to gain access to the records. Personally identifiable information is only shared when allowable by law and consistent with the Company's policies.

Henry Schein is responsible for servicing and protecting its electronic communications and telephone networks. Henry Schein seeks to maintain Team Schein Members' privacy but reserves the right in accordance with applicable law to monitor use of Company property in accordance with policies, including for investigations. The Company may monitor communications and computer systems, or access them, in accordance with applicable law, for example, to ensure the integrity of the technology, to protect against fraud and abuse, to detect unauthorized access or use, and for other purposes permitted by applicable law.

Henry Schein takes commercially reasonable precautions to keep all data in our possession secure against unauthorized access or use, (e.g., data breach) and periodically reviews security measures. Henry Schein is committed to employing reasonable security measures, regularly reviewing security practices (via security and risk assessments or audits) and providing regular awareness training.



Social Media

Henry Schein respects the legal rights of our Team Schein Members to use social media on their personal time for personal reasons and encourages appropriate and professional use in keeping with the Standards. However, inappropriate and unprofessional use of social media that affects job performance, the performance of other employees or contingent workers, conflicts with the Company's interests, or impacts the Company's reputation and business interests are covered by the Standards. Violations of our policy may lead to disciplinary action up to and including termination of employment.



For more information:

- Global Data Protection Principles (Privacy and Security) (CC-009-GP)
- Data Privacy Policy (CC-009)
- Global Principles for the Responsible Use of Artificial Intelligence (CC-011-GP)
- Electronic Communication Policy (IS-403)
- Equal Employment Opportunity Affirmative Action Policy (US Only) (HR-001)
- Anti-Harassment Policy (HR-004)
- Alcohol and Drug Free Workplace Policy (HR-013)
- Workplace Anti-Violence Policy (HR-015)
- Safety Rules - Distribution Centers and Office Policy (PS-001)
- Emergency Response Plans Policy (PS-002)
- Safety And Security - Henry Schein Dental Offices Policy (PS-006)
- Social Media Policy (CM-002)
- Social Media Handbook (attached to Social Media Policy)

Media Relations and External Inquiries

At Henry Schein, we speak with one voice when communicating with the media, financial analysts, investors, the government, and the public. To maintain responsible and secure handling of external inquiries, and to ensure accurate and appropriate communication on behalf of Henry Schein, Inc., only authorized and trained Team Schein Members may respond to such requests. This policy is in place to adhere to legal requirements and safeguard our interests as a publicly traded company.

What Team Schein Members can do:

If a Team Schein Member receives an inquiry and is not authorized to respond, it is crucial not to offer any statements or comments. This precaution is taken to minimize the risk of accidentally providing incorrect information or disclosing sensitive details.

Investors, Analysts, and the Media: To manage an inquiry effectively from these groups, Team Schein Members should follow these steps:

- Politely inform the requestor that they cannot comment on the matter.
- If possible, gather information about the requestor's inquiry, including the requestor's name, publication, email address, deadline, and the nature of their request.
- Notify their Manager and email CorporateCommunications@henryschein.com with the collected information.



Government Inquiries: Henry Schein is committed to cooperating appropriately with government inquiries. Team Schein Members should inform the General Counsel's office promptly of all governmental inquiries, investigations, or subpoenas. Any regulatory audit requests should be sent to the Regulatory Affairs team. Remember, never destroy or alter any record that may become part of a government inquiry, investigation, audit, or litigation. Team Schein Members must follow any directions given by the Legal Department related to government actions.

For more information:

- Corporate Communications Policy (CM-001)
- Government Investigations Policy (LG-007)

Why the Worldwide Business Standards Matter

With every Team Schein Member adhering to our Worldwide Business Standards, we can continue to excel in the markets we serve. By protecting the integrity of our Company for our customers, our suppliers, our shareholders, our society, and our team, we help achieve the excellence for which we strive every day and ensure that our best years are yet to come.



Henry Schein, Inc.
135 Duryea Road
Melville, New York 11747 U.S.A.
1-631-843-5500
HenrySchein.com

