

Henry Schein, Inc. and its subsidiaries and affiliates (also collectively referred to as “Henry Schein”, “Company” or “we”) believe acting ethically and responsibly is the right thing to do for society and our business. We expect our suppliers, vendors, distributors, service providers, and agents acting on our behalf (collectively “Third Parties” or “you”) to uphold this commitment by complying with applicable laws and conducting business with integrity, transparency, and in alignment with our corporate social responsibility and sustainability goals.

In alignment with the [United Nations Guiding Principles on Business and Human Rights](#), the provisions in this global Third Party Code of Conduct (“Third Party Code”) are derived from and respect internationally recognized standards, including those established by the International Labour Organization (“ILO”), the Organization of Economic and Development (“OECD”), and other international organizations and agreements.

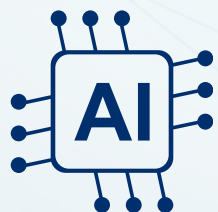
The Third Party Code complements our Worldwide Business Standards (available in the [Corporate Governance](#) section of our Henry Schein website) and our other policies and standards referenced therein. By doing business with our Company, we expect you to meet or exceed the principles and standards in this Third Party Code and to ensure that your services and products reflect ethical practices and protect human rights and the environment.

You shall require your subcontractors and sub-tier suppliers to comply with the principles and standards in our Third Party Code in your operations and across your supply chains for work that is directly related to Henry Schein. Third Parties that behave in a manner that is unlawful or inconsistent with the Third Party Code, or any Henry Schein policy, risk termination of their business relationship with Henry Schein. Complying with the Third Party Code is required in addition to meeting any other obligations contained in any contract or arrangement you may have with Henry Schein.

We Require That You Adhere to These Business Conduct Principles

Business Conduct Principles

Requirements



Artificial Intelligence

Use it wisely and safely

We expect the use of artificial intelligence (AI) to be aligned with our values and comply with laws and regulations by ensuring human oversight, safety, accuracy, and transparency.

You must obtain approval before using AI systems, bots, widgets, apps or features to manage our data and must ensure that any AI system handles data and confidential information lawfully, for specific purposes, and only as necessary.

It is expected that you will protect data and confidential information, make AI understandable, prevent bias and discrimination, follow legal rules for cross-border transfers and maintain accountability.

You are prohibited from using our data to train any AI models.

Business Conduct Principles



Conflict Minerals

Source minerals responsibly and restrict the use of conflict minerals



Conflicts of Interest

Act in the best interests of our Company



Data Privacy and Protection

Protect confidential business information and safeguard data privacy

Requirements

You must not source, directly or indirectly, any tin, tantalum, tungsten, or gold (“3TG”) from the Democratic Republic of the Congo or an adjoining country, unless such minerals have been evaluated through a reasonable, risk-based due diligence framework consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

Upon request, you must provide Henry Schein with complete and accurate documentation demonstrating the origin of any 3TG mineral contained in your products, including standardized reporting templates (such as the Responsible Minerals Initiative Conflict Minerals Reporting Template or equivalent), smelter/refiner information, and supporting records sufficient to verify sourcing practices.

You must retain such records for a minimum of five (5) years and promptly notify Henry Schein if you become aware of any information indicating that any 3TG mineral product supplied may not be compliant with this requirement.

We act with integrity, independence, professionalism, and in an ethical manner by preventing actual, potential and perceived conflicts of interest. You must remain free from improper influences stemming from personal, business, or other relationships that could compromise, or appear to compromise, our Company’s best interests and reputation.

Avoid situations where personal or financial interests interfere with business judgment (e.g., avoid receiving or offering inappropriate gifts or bribes). You must proactively disclose actual or potential conflicts involving your employees, such as:

- close personal relationships with our employees (e.g., one of your employees is a spouse or family member of a Henry Schein employee)
- when a Henry Schein employee has a substantial financial or ownership stake in your business or organization
- you employ a former Henry Schein employee under a non-compete clause

Henry Schein must review and approve such conflicts before any business is initiated or continued.

All Henry Schein records and information relating to our Company, customers, or employees, and any other non-public information obtained by you through your association with our Company are considered sensitive and may be confidential. This is true whether the information is marked “confidential.”

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.

Business Conduct Principles



Data Privacy and Protection

(cont'd)



Environmental Responsibility

Conduct your operations responsibly, taking care of the environment and following all applicable environmental laws and regulations



Ethical Business Conduct

Compete fairly for business, without paying bribes, kickbacks or giving anything of value to secure or retain an improper advantage

Requirements

Henry Schein is committed to protecting the personal information of all individuals who work with or on behalf of us, including you as a third party. As such, Henry Schein will protect all personal, confidential, and proprietary information of its third parties by using it only for legitimate business purposes, limiting access to only authorized personnel, and in accordance with security practices. Third parties are expected to do the same and protect all data obtained during the course of business with Henry Schein. If you have been given access to any confidential information, you must not share this information unless authorization is granted by Henry Schein. If you become aware of or suspect a breach or an attempted breach of personal or confidential information, you must notify the Company's General Counsel or the Chief Ethics & Compliance Officer.

When making business decisions, you must evaluate the potential environmental impacts of your activities and actively pursue opportunities to conserve natural resources, promote recycling, reduce waste at the source, and prevent pollution. This includes efforts such as lowering carbon emissions, managing waste responsibly, and safeguarding air and water quality, with the goal of minimizing landfill use, regardless of whether your country is a party to the Stockholm, Basel, or Minamata Conventions.

You must not engage in, support, or facilitate any unlawful eviction or the illegal acquisition or use of land, forests, or water resources in connection with business operations or development activities.

We are committed to conducting business legally, ethically and fairly within the framework of a free enterprise system. We prohibit any type of corrupt arrangements including paying bribes, kickbacks or giving anything of value to secure or retain an improper advantage (including gifts and donations) with customers, suppliers, government officials or other third parties.

This means that you may not provide or offer gifts or entertainment to our employees or another third party on our behalf, either directly or indirectly, that could inappropriately influence business decisions or gain an unfair advantage. You shall maintain accurate financial books and business records in accordance with all applicable laws and regulations and accepted accounting practices and prohibit financial or professional conflicts of interest.

You may have access to financial, business or other information about the Company that is both material and not available to the public. Insider trading is prohibited and you must not use or share non-public material information for the purpose of trading in Henry Schein, Inc. securities.

Business Conduct Principles

Human Rights



Respect fundamental human rights: Treat your workforce fairly and with respect and dignity in a safe working environment

Requirements

We respect human rights as recognized by the principles in the United Nations Universal Declaration of Human Rights; the International Covenant on Economic, Social and Cultural Rights; the International Covenant on Civil and Political Rights; and the ILO Declaration on Fundamental Principles and Rights at Work.

We strictly prohibit the use of child, forced, and/or prison labor by Third Parties.

Treat your workforce fairly, with respect, and with dignity in a safe working environment. You are required to comply with applicable ILO standards, such as recruitment and housing practices, and maintain and promote fundamental human rights. This includes:

- Creating a work environment in which employees and business partners feel valued and respected for their contributions
- Basing employment decisions on free choice that do not involve forced labor (for adults or children), child labor (i.e., adhere to the minimum employment age limit in the applicable jurisdiction), prison labor, or physical punishment or threats of violence
- Maintaining fair and responsible employment practices involving working hours, living wages, overtime, other elements of compensation and legally mandated benefits
- Prohibiting physical, sexual, psychological or verbal abuse as a method of discipline or control
- Prohibiting harassment, including unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment
- Not engaging in discrimination based on alienage or citizenship, social status, age, color, creed, political opinion, disability and/or health status, gender identity, genetic characteristics, marital status, domestic violence victim status, conviction record, military status, membership in a trade association or union, national origin, pregnancy, childbirth-and pregnancy-related medical conditions, race, religion, sex/gender, sexual orientation, or veteran status
- Using fair and equitable practices regarding hiring, compensation, advancement, discipline, termination and retirement
- Respecting workers' rights to join or refrain from joining associations and worker organizations
- Providing legitimate communication channels for workers to openly communicate and share grievances with management about working conditions and management practices without fear of reprisal, intimidation or harassment
- Ensuring a safe working environment is provided and managing health and safety risks to minimize occupational injuries and illnesses. This includes ensuring that any private or public security forces that are hired by you respect human rights and comply with this Third Party Code
- Implementing processes and systems to prevent or respond to a catastrophic release of hazardous materials

We reserve the right to request documentation and preserve audit rights to ensure third party compliance with the above-mentioned human rights. We also reserve the right to require third parties to carry out remediation in the event human rights violations are identified.

Business Conduct Principles



Laws & Regulations

Maintain awareness of, and comply with, all applicable laws and regulations



Quality

Deliver products and services that meet or exceed quality and safety standards



Speak Up

Report suspected or actual violations of this Third Party Code

Requirements

You must be aware of applicable laws and regulations and comply with them. This includes laws both in the United States and other countries where you do business. We expect you to:

- Make sure transactions are not being used for money laundering or other illicit purposes
- Prohibit the sale of our products or services to embargoed and sanctioned countries or entities as identified by the US Office of Foreign Asset Control (OFAC) or Bureau of Industry and Security (BIS)
- Ensure that you are not participating in, cooperating with or supporting in any way any boycott or restrictive trade practice that is not sanctioned by the laws or regulations of the United States or other applicable jurisdiction
- Obtain proper and current licenses, registrations and customs documents before exporting, re-exporting, or transshipping certain goods, software, and technology that are controlled for export
- Observe all applicable customs laws, including payment of the appropriate duties on imported product, and ensure that product is imported and distributed in the United States or other countries in compliance with applicable law

We expect you to have appropriate management processes and adequate controls in place to ensure the integrity, quality and safety of your products and services provided to Henry Schein and to maintain records that demonstrate compliance with these requirements.

With prior notice, we may conduct audits to verify your compliance with this Third Party Code.

We expect you or your employees to bring actual or suspected violations of this Third Party Code to our attention via the Henry Schein confidential Compliance Helpline, which is available worldwide, 24 hours a day, 7 days a week at 1 (800) 381- 4650 for United States, Puerto Rico, and Canada or via our web portal: <https://henryschein.integrityline.com>. A listing of other country-specific Helpline numbers is available on Henry Schein's [Corporate Governance webpage](#).

All such reports are treated as confidential, and you can remain anonymous if you wish but please provide sufficient detail so the matter can be investigated.

Henry Schein has an established protocol for investigating possible violations of law or policy, this Third Party Code, as well as fraud, waste, and abuse concerns. Suspected instances of these issues must be reported through the Compliance Helpline noted above.

Our policy prohibits retaliation against any person raising questions or concerns about suspected violations of our WWBS or Third Party Code or for participating in an investigation of any suspected violation.