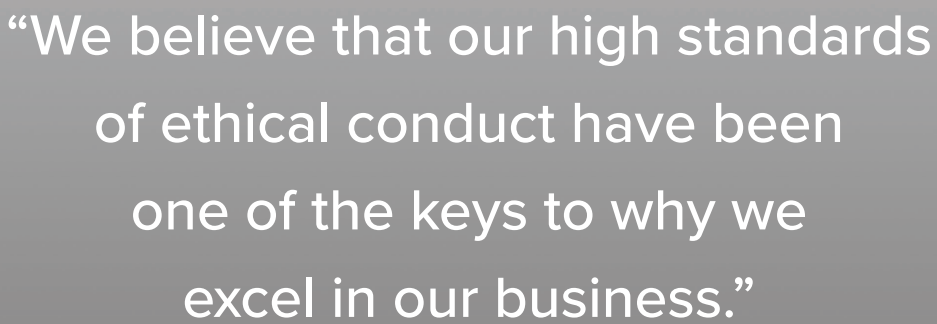




WORLDWIDE BUSINESS STANDARDS

Integrity and Excellence



DEAR TEAM SCHEIN MEMBERS

As the world's largest provider of Business, Clinical, Technology, and Supply Chain solutions, Henry Schein is a solutions company for health care professionals powered by a network of people and technology. We at Henry Schein are proud of our reputation. Since our origins in a corner drugstore in 1932, the Henry Schein heritage and corporate culture, as reflected in The Values of Team Schein, have fostered an overriding commitment to the highest standards of integrity and excellence.

Our Corporate Charter states that:

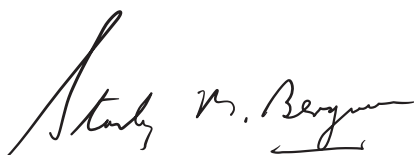
- to our customers, we provide the best quality and value in products and services, helping our customers, as trusted advisors and consultants, to deliver quality health care to patients, efficiently operate and grow their practices, and increase their financial return and future security;
- to Team 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 our shareholders and venture partners, we endeavor to provide continued growth and profitability, resulting in a superior return on investment; and
- to society at large, we will 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. Indeed, Henry Schein's 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 our reputation — 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, 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 us as representatives and leaders of Henry Schein. These standards of conduct are not new to our Company. In fact, the *Worldwide Business Standards* simply embody the many policies and practices that have existed within our Company for decades.

The *Worldwide Business Standards* apply to every Team Schein Member, that is, employees and officers of Henry Schein and its subsidiaries and affiliates, members of our Board of Directors, and to every Team Schein Member's interactions with third parties. 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. 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 maintaining our *Worldwide Business Standards* as a way of doing business every day.



Stanley M. Bergman
Chairman and Chief Executive Officer



Our Worldwide Business Standards...
Read Them, Understand Them, Live Up To Them.
Be An Integrity Partner!

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INTRODUCTION



The Worldwide Business Standards are Fundamental

What is this Document: The *Worldwide Business Standards* set forth the fundamental responsibilities of all those who represent Henry Schein's good name. Together with *The Values of Team Schein*, the *Worldwide Business Standards* describe the ethical and legal responsibilities that all Team Schein Members are expected to uphold. Team Schein Members include employees and officers of Henry Schein and its subsidiaries and affiliates, and members of our Board of Directors. This *Worldwide Business Standards* document (sometimes referred to as the "Standards") is a guide and a resource, and is intended to advise Team Schein Members how to handle significant legal and ethical issues that may arise.

One of the truest sayings heard around the world is that "actions speak louder than words."

Why is it Needed: The success of Team Schein requires honesty and integrity of Team Schein Members in all that we do. This means, for example, that Team Schein Members must ensure that truthfulness and accuracy are a part of everything that we do.

Our *Worldwide Business Standards* are effective when Team Schein Members read them, understand them, and live up to them.

Compliance with Laws: The first and foremost obligation of all Team Schein Members is to obey the laws of the countries and communities in which Henry Schein does business. Any case of noncompliance with applicable law may subject a Team Schein Member to disciplinary action up to and including termination of employment. The fact that in some countries certain conduct is legally prohibited, but these prohibitions are not enforced in practice, or their violation is not subject to public criticism or censure, will not excuse an illegal action by a Team Schein Member.

How are the Standards Administered:

Henry Schein has established a Compliance Committee, made up of senior officers of the Company, to oversee compliance with laws, regulations, the Company's *Worldwide Business Standards*, and related standards, policies, and procedures.

Henry Schein has also designated a Chief Compliance Officer responsible for overseeing the day-to-day implementation of, and compliance with, Henry Schein's ethical standards, including communications and training. One of the Compliance Officer's most important responsibilities is to investigate all calls received on Henry Schein's toll-free confidential Compliance Helpline: **877-285-4157; for dialing from outside the United States, please see the instructions on the inside back cover of this brochure.** In addition, reports may be submitted via our website at <http://HenrySchein.Alertline.com>. Within this document, the "Helpline" includes both the toll-free phone number as well as the online portal. Translation services are available for those who report in languages other than English. The Helpline is available to Team Schein Members 24 hours a day, 7 days a week and reports may be submitted anonymously.

The Worldwide Business Standards are a Starting Point

The *Worldwide Business Standards* is not intended to address every ethical, legal, and regulatory compliance issue that a Team Schein Member might face, nor is it a summary of all laws, regulations, and policies that apply to Henry Schein businesses or Team Schein Members. Most importantly, the *Worldwide Business Standards* is neither a substitute for good judgment nor a restraint on the entrepreneurial initiative of Team Schein Members for which Henry Schein is so well known, but they provide guidelines that must be integrated into those initiatives.

The *Worldwide Business Standards* capture Henry Schein's long-standing commitment to proper behavior and promote 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;
- Compliance with applicable governmental laws and regulatory rules;
- Full, fair, accurate, timely, and understandable public reporting and communications;

- Prompt internal reporting of inappropriate behavior or conduct; and
- Accountability for adherence to the *Worldwide Business Standards*.

The Worldwide Business Standards are Global

The *Worldwide Business Standards* apply to all Team Schein Members in all businesses and subsidiaries of Henry Schein worldwide. Team Schein Members cannot use a contractor, agent, consultant, broker, distributor, or other third party to perform any act prohibited by law or by Henry Schein policy. If compliance with the Standards appears to conflict with local law, Team Schein Members should discuss their concerns with the Company's Chief Compliance Officer.

It is the responsibility of each Team Schein Member to comply with the *Worldwide Business 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 *Worldwide Business 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 Compliance Officer, any member of the Compliance Committee or Henry Schein's confidential Compliance Helpline.

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

Team Schein Members who fail to comply with the *Worldwide Business Standards*, including not reporting known illegal or unethical activities, may be subject to disciplinary action up to and including termination of employment.

Team Schein Members who report an ethical or legal concern in good faith will not be subject to disciplinary action or retaliation for reporting. Any Team Schein Member responsible for retaliation against an individual who, in good faith, reports a known or suspected violation may be subject to disciplinary action up to and including termination of employment. In addition, Team Schein Members who knowingly submit false reports may also be subject to disciplinary action up to and including termination of employment.

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.

OUR RESPONSIBILITIES TO OUR CUSTOMERS



“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

Our Mission: To help our customers be more successful so that they can focus on delivering the best quality care.

“We believe that conducting ourselves with the highest degree of ethics and integrity is foremost in driving the business and in doing business.”
— The Values of Team Schein

Quality

Henry Schein is committed to marketing and distributing only high-quality health care products and services at an excellent value — products and services that we would be comfortable using or having used on us. Whenever a Team Schein Member has any concerns about quality compliance, he or she should promptly inform a supervisor, or escalate to the Quality Affairs Department. They may also report violations to the Chief Compliance Officer's office or Henry Schein's confidential Compliance Helpline (see back cover for further details).

Marketing and Sales Practices

Henry Schein is confident in its ability to succeed in a fair, open, and competitive marketplace. Individuals responsible for merchandising, sales, marketing, and business development must be familiar with local, regional, and country-specific laws that govern advertising and competitive practices of the marketing industry. Product, service, and pricing claims or disclosures, or comparisons with competitors' products should be accurate.

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-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.

Providing

Occasional and modest gifts and moderate hospitality (i.e., lunch or dinner) may be provided if they are reasonable complements to business relationships, and not against the law or any rules or regulations that apply to the Company. 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 of goods and service in the normal course of business.

Accepting

Accepting occasional gifts and hospitality of modest value may be appropriate in developing business relationships. Gifts and 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 influenced improperly.

Providing or accepting certain gifts should be avoided altogether and are never allowed. Such gifts include lavish entertainment or cash or cash equivalents.

Reporting

Gifts and entertainment that may appear to be lavish or excessive require the prior written approval of the Chief Compliance Officer, in consultation with the Compliance Committee. Recipients of prohibited gifts or favors should let management know and return the gift with a letter explaining Henry Schein's policy. If a gift is perishable or impractical to return, management should donate it to charity, with a letter of explanation to the donor.

Interactions with Health Care Professionals

Henry Schein is committed to ethical interactions with health care professionals. Strong working relationships with health care professionals are essential to Henry Schein's success and to continued improvement and innovation in patient 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 recommend and use our products and services.

Our collaborations with health care professionals are closely regulated by government authorities and subject to additional scrutiny. 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.
- 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 and appropriately documented, and consistent with applicable transparency requirements.

Prohibition on Payments to Government Employees and Officials

Team Schein Members may not make payments or offer anything of value to political parties, employees of governments, state-owned or state-controlled enterprises, international organizations, or candidates for political office to influence such persons or entities to misuse their position or obtain any improper advantage. This prohibition applies not only to direct payments to improperly influence such persons or entities, but also to indirect payments made to any person or entity that a Team Schein Member has reason to believe will pass it on to improperly influence a government employee or official, and to indirect improper payments made to any person designated by a government employee or official.

Team Schein Members must abide by the U.S. Foreign Corrupt Practices Act, which prohibits American 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 you have reason to believe will pass it on to a foreign official for the purpose of influencing a foreign government (i.e., "middlemen" such as representatives or consultants). Such corruption not only violates U.S. criminal laws, it also violates the criminal laws of most of the host countries in which we do business, including the U.K. Bribery Act 2010.

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 must report the incident promptly to the General Counsel's or Chief 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 Compliance Officer's office before taking further action. Additionally, all Team Schein Members must promptly report any violation or suspected violation of these prohibitions to the General Counsel's or Chief Compliance Officer's office or Henry Schein's confidential Compliance Helpline (see inside back cover for further details).



“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

OUR RESPONSIBILITIES TO THE MARKETPLACE



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.

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 such 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. Nor should any improper means be used to acquire a competitor's trade

secrets or confidential information. Information about prices is especially sensitive. Although you may obtain published pricing information of competitors through normal publicly available channels, you should avoid discussing any price information with competitors or obtaining unpublished 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.

Business Courtesies or Other Benefits

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.



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

“At Henry Schein, all Team Schein Members are expected to: Hold firm to the ethical principles that are the foundation of our business... Maintain personal and professional integrity at the highest levels.” — The Values of Team Schein

 HENRY SCHEIN®

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OUR RESPONSIBILITIES TO OUR SHAREHOLDERS



Financial Reporting and Records

Henry Schein has established and maintains a high standard of transparency, accuracy and completeness in the documentation and reporting of all financial information. Our financial records serve as the basis for managing our business and are important in meeting our obligations to colleagues, shareholders, and the public for full, fair, and understandable public reporting and communications. These records are also necessary for substantiation of compliance with tax, financial, and other reporting requirements.

All financial information must reflect actual transactions and conform to generally accepted accounting principles. All information relating to the Company's business must be reported and recorded accurately. 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. No undisclosed or unrecorded funds or assets may be established.

Henry Schein maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management's authorization and are properly accounted for and recorded. All Team Schein Members must take appropriate steps to ensure that their team members comply with these internal controls. No Team Schein Member shall, at any time, offer or provide to anyone monetary compensation, gifts, or kickbacks to obtain or transact business on behalf of the Company. Any Team Schein Member who believes that a payment is to be used for an improper purpose or who is aware of any action prohibited by the above, must promptly report the matter to the Team Schein Member's supervisor, the Chief Compliance Officer or any member of the Compliance Committee or Henry Schein's confidential Compliance Helpline (see inside back cover for further details).

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, i.e., purchasing or selling a security either personally or on behalf of others at a time when the person trading in that security possesses material, nonpublic information about the issuer of the security.

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 and their families are prohibited from buying or selling Henry Schein stock or other Henry Schein securities except during specified periods.

Protecting Assets

All Team Schein Members are entrusted with the care of numerous Company assets, and have a special responsibility to protect and judiciously utilize them. This includes not only cash and other financial assets, but also assets like facilities and equipment, inventory, computers, sensitive data, and supplies. An act by a Team Schein Member that involves theft, fraud, embezzlement, misuse or misappropriation of Company assets may subject the Team Schein Member to disciplinary action up to and including termination of employment.

Sensitive and Confidential Information

All Company records and information relating to the Company and its customers and suppliers, as well as Team Schein Members, that have not been duly released 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

OUR RESPONSIBILITIES TO OUR SHAREHOLDERS (CONTINUED)

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.

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 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 policy, insofar as it covers disposal of records, should stop immediately. No Team Schein Member should ever, under any circumstances, destroy any Henry Schein record in anticipation or contemplation of a request for such records in litigation or from any governmental agency.

A Team Schein Member receiving information regarding pending or potential litigation, governmental investigation or audit should promptly notify the General Counsel's office.

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. Team Schein Members also must avoid:

- using information learned through their positions at Henry Schein for personal gain or advantage;
- disclosing confidential information or failing properly to safeguard confidential information from unauthorized third parties; and

- obtaining for a third party an improper gain or advantage (such as loaning Henry Schein funds to, or arranging for the Company to guarantee the obligations of, family members or friends).

All Team Schein Members have an obligation to devote their full business time and efforts to the Company as well as to make sure they remain free of conflicts of interest in the performance of their duties at Henry Schein.

A conflict of interest may also 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. Team Schein Members have a duty to advance the Company's legitimate interests when the opportunity to do so arises.

Any Team Schein Member who has a question about whether an outside activity might constitute an actual or perceived conflict of interest between one's personal and Company-related relationships or a breach of his or her obligations to the Company must obtain the approval of the Chief Compliance Officer's or General Counsel's office before pursuing the activity.

Electronic Communications, Social Media, and Company Telephones

Henry Schein encourages the business use of electronic communications such as voice mail, electronic mail, fax, and telephone to enhance productivity. Electronic communications and telephone systems, and all messages generated on or handled by those systems, are considered to be the property of Henry Schein and are not the property of the individual users.

Henry Schein's electronic communications and telephone systems are to be used for business activities. Incidental personal use, including social media, is permitted as long as:

- it does not consume a material amount of time or resources;
- it does not interfere with productivity; and
- it does not preempt any business activity.

Henry Schein is responsible for servicing and protecting its electronic communications and telephone networks. To accomplish this, it is



occasionally necessary to monitor, intercept or disclose electronic or telephonic communications. Although it is not Henry Schein's policy to regularly monitor the content of electronic or telephonic communications, the content may be monitored. Usage of the electronic communications or telephonic systems may be monitored to support operational, maintenance, training, auditing, security, and investigative activities.

Henry Schein respects the legal rights of our Team Schein Members to use social media on their personal time. Activities in or outside work that affect job performance, the performance of other employees or contingent workers, or the Company's reputation and business interests are proper areas of concern for the Company and may be subject to Company policies.

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.

Data Privacy and Security

Henry Schein respects the data privacy rights of Team Schein Members and our customers, which may vary depending on the country in which they live. Henry Schein retains personally identifiable information for business, legal or contractual purposes, and keeps 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 must not be disclosed to anyone outside the Company except in accordance with the Company's policies.

Henry Schein seeks to maintain employee 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 (e.g., data breach) and use, 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.



OUR RESPONSIBILITIES TO SOCIETY AT LARGE



“To society at large, at Henry Schein, we believe in the domino effect — we each have an impact on one another. It’s an illustration of our entrepreneurial spirit. Each of us affects each of us.”

— The Values of Team Schein



Regulatory Compliance

Henry Schein is subject to a variety of national, state, and local regulations that are enforced by numerous agencies. These agencies include the Food and Drug Administration, the Drug Enforcement Administration, the Occupational Safety and Health Administration, the Department of Transportation, the Federal Aviation Administration, the Environmental Protection Agency, the Securities and Exchange Commission, and the Bureau of Customs and Border Protection in the United States, and comparable agencies in other countries.

Henry Schein depends on every Team Schein Member to uphold the Company’s regulatory reputation. Whenever a Team Schein Member has any concerns about regulatory compliance, he or she should promptly inform a supervisor, or escalate to the Regulatory and Quality Affairs Department. They may also report violations to the Chief Compliance Officer’s office or Henry Schein’s confidential Compliance Helpline (see inside back cover for further details).

The Environment

Henry Schein makes every effort to comply with all applicable environmental laws and regulations. Every Team Schein Member has a duty to help Henry Schein comply with environmental laws and regulations. Team Schein Members should report possible environmental hazards and violations to a supervisor, the Chief Compliance Officer or any member of the Compliance Committee. 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 and regions where we operate. We encourage sustainable practices across our businesses, because a healthy environment means a healthier community.

Government Investigations

Henry Schein is committed to complying with all applicable laws, rules and regulations, and cooperating appropriately with government inquiries. Team Schein Members should inform the General Counsel's office promptly of all governmental inquiries, audits, and reviews. Remember, never destroy any record that may become part of a government inquiry, audit, review, or litigation. Team Schein Members must follow any directions given by the Legal Department related to government actions.

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. These policies apply 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 fund-raising events or furnishing other goods, services, or equipment to political parties or committees.

These policies apply only to the direct or indirect use of Henry Schein's funds or assets for political purposes, and are not intended to discourage Team Schein Members from making personal contributions to the candidates, parties, or committees of their choice. Nor are these policies intended to discourage any Team Schein Member from being involved in politics or active in civic life. These political or civic activities, however, must be 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 as defined in the United Nations' Guiding Principles on Business and Human Rights. We follow applicable labor laws and do not allow child labor, forced labor, or trafficking by Henry Schein or its Business Partners. Henry Schein respects the rights of our Team Schein Members to freedom of association, freedom of expression, and the right to be heard.

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 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 merchandise, and otherwise ensure that merchandise is imported and distributed in the United States or other countries in compliance with law; and
- ensure that companies comply with all applicable laws and regulations governing disclosure and conduct related to conflict minerals, including engaging in reasonable due diligence process with suppliers on the origin, source, and chain of custody of conflict minerals.

Every Team Schein Member has a duty to comply with, and to ensure that Henry Schein complies with, all such 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 the Chief Compliance Officer's office or Henry Schein's confidential Compliance Helpline (see inside back cover for further details).

"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



OUR RESPONSIBILITIES TO OURSELVES AND OTHER TEAM SCHEIN MEMBERS

Human Resources

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. Any Team Schein Member who violates this policy may be subject to disciplinary action up to and including termination of employment. 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 alienage or citizenship, age, color, creed, disability, gender identity, genetic characteristics, marital status, domestic violence victims status, conviction record, military status, national origin, pregnancy, child-birth and pregnancy medical conditions, including but not limited to lactation, race, religion, sex/gender, sexual orientation, veteran status or any other category protected by national, state or local laws. This is reflected in all of 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.

Harassment in the Workplace: Just as sexual harassment is strictly prohibited, so is harassment on the basis of alienage or citizenship, age, color, creed, disability, gender identity, genetic characteristics, marital status, domestic violence victims status, conviction record, military status, national origin, pregnancy, child-birth and pregnancy medical conditions, including but not limited to lactation, race, religion, sex/gender, sexual orientation, veteran status or any other category protected by national, state or local laws. 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. Harassment of any sort — verbal, physical or sexual — will not be tolerated. Henry Schein strictly prohibits all harassment, whether sexual harassment or based on any other characteristic.

Any Team Schein Member who engages in such conduct is subject to disciplinary action up to and including termination of employment. 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.

Any Team Schein Member who believes he or she is being harassed should report the harassment at once to his or her supervisor, the Human Resources Department, the Chief Compliance Officer, any member of the Compliance Committee or Henry Schein’s confidential Compliance Helpline. Upon receiving such a complaint, an appropriate investigation will be undertaken.

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. Team Schein Members who commit such acts will be subject to disciplinary action up to and including termination of employment.

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 supervisor, the Chief Compliance Officer, any member of the Compliance Committee or Henry Schein’s confidential Compliance Helpline.



ADMINISTRATION OF WORLDWIDE BUSINESS STANDARDS



Team Schein Members

The successful application of the *Worldwide Business Standards* depends on each Team Schein Member accepting the responsibility to act honestly and ethically. Dishonest or unethical behavior should not be tolerated by any Team Schein Member, no matter when, where, or how it occurs. Henry Schein has prepared the Standards to assist Team Schein Members in resolving a variety of ethical and legal issues that may arise in the course of conducting our business. Not every situation covered will apply to all Team Schein Members. Moreover, it is not possible to draft standards of conduct that cover every possible situation a Team Schein Member might confront. Every Team Schein Member should also be guided by his or her internal sense of honesty and integrity.

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

A Team Schein Member's failure to comply with the *Standards* may be cause for disciplinary action, up to and including termination of employment. 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 the Chief Compliance Officer.

Policies

Henry Schein has policies, procedures, guidelines, memoranda and compliance documents (collectively, the "policies") that outline in greater detail the issues covered in these *Standards*. Team Schein Members should be aware that Henry Schein has policies in place, available on the Company intranet and Compliance Learning Center. Team Schein Members should consult the policies of Henry Schein as they apply and bring any questions to their management. Policies are reviewed and updated (if needed) annually, so it is important to check that you have access to the latest version.

Every Team Schein Member is responsible for reading and understanding the Worldwide Business Standards.

Operations Outside the United States

Henry Schein distributes its products in more than 200+ countries. Team Schein Members are expected to be aware of and to comply with the applicable standards of conduct of other countries in addition to complying with these *Standards* to the extent they do not conflict. In the event of a conflict between local standards of conduct and the *Standards*, Team Schein Members should consult with the Chief Compliance Officer.

Confidential Reporting of Suspected Violations or Concerns; Toll-Free Confidential Compliance Helpline

A Team Schein Member who becomes aware of what he or she believes is a violation of these Standards has a duty to promptly report that information to his or her supervisor, the Chief Compliance Officer, any member of the Compliance Committee, or the Compliance Helpline. In addition, complete and accurate financial reporting is of utmost importance to Henry Schein. Any Team Schein Member who becomes aware of information that gives the Team Schein Member any concern with regard to Henry Schein's accuracy of or compliance with policies concerning accounting, internal accounting controls, financial reporting, or auditing matters (an "Accounting Matter") should promptly report that information in the same manner. Suspected violations of Henry Schein policies, health care program requirements, or other applicable laws, regulations, or industry codes should also be reported.

To facilitate and encourage the prompt reporting of suspected violations and to provide Team Schein Members with every possible avenue in which to raise their concerns, Henry Schein has a Compliance Helpline: **877-285-4157; for dialing from outside the United States, please see the instructions on the inside back cover of this brochure.** These phone numbers are available to Team Schein Members 24 hours a day, 7 days a week. Calls and reports will be treated confidentially, and concerns can be raised anonymously if the Team Schein Member feels that is necessary. Please keep in mind, however, that an anonymous report or call may be more difficult to investigate. Henry Schein's Chief Compliance Officer, his or her designees, and/or the appropriate department, will investigate all calls and reports. The General Counsel's office or outside counsel may assist in these investigations, or they may be conducted at their direction.

ADMINISTRATION OF WORLDWIDE BUSINESS STANDARDS (CONTINUED)

Henry Schein prohibits retaliation against a Team Schein Member for reporting in good faith an actual or suspected violation of these *Standards*, any other Company policy or procedure, or any other applicable law or regulation. If you feel that your question, complaint or concern is not being addressed or addressed appropriately, you should bring it to the attention of the Chief Compliance Officer or any member of the Compliance Committee.

Investigations

Reports of suspected violations will be promptly investigated. Complaints will be referred to the Chief Compliance Officer who may work with

other departments as necessary for further investigation. The investigations are conducted in a confidential manner and typically involve an examination of relevant records and interviews of persons who may have knowledge of the facts related to the reported concern or issue. Investigations may take several weeks before conclusions are reached. To the extent improper conduct in violation of the *Worldwide Business Standards* is found to have occurred, appropriate action will be taken. Every report is investigated and all investigation results are reviewed in confidence by the Compliance Committee to ensure that proper procedures are followed in the investigation and disposition of each report.



Integrity and Excellence



SOLUTIONS FOR HEALTH CARE PROFESSIONALS

WORLDWIDE BUSINESS STANDARDS

To administer the Compliance Program, Henry Schein has named Nancy Lanis, Vice President and Chief Compliance Officer (e-mail: Nancy.Lanis@henryschein.com) to the position of Compliance Officer for these *Worldwide Business Standards*.

The Company has established a Compliance Committee of senior officers of which the Chief Compliance Officer will be a member and collectively to whom the Chief Compliance Officer will report.

The Compliance Committee will oversee administration of the Compliance Program. The members of the Compliance Committee can be found at <https://connect.henryschein.com/Corp/USA/Comp/Pages/default.aspx>.

Henry Schein has a toll-free confidential Compliance Helpline: **877-285-4157**; any Team Schein Member can report compliance concerns or questions 24 hours a day, 7 days a week.

For dialing from outside the United States, please use the AT&T access code for your country, which can be obtained at <http://www.business.att.com/bt/access.jsp> or ask a Human Resources representative for assistance in obtaining the access code. After obtaining the access code you will need to use that code followed by the toll-free Compliance Helpline phone number.

Reports may also be made via our website:

<http://HenrySchein.Alertline.com>

Calls and reports will be treated confidentially, and concerns can be raised anonymously if the Team Schein Member feels that is appropriate.

LIST OF IMPORTANT PHONE NUMBERS

Chief Compliance Officer	1-(631) 843-5569
Compliance Helpline	1-(877) 285-4157 (Dialing from outside the United States requires an access code, please see above for instructions)
General Counsel's Office	1-(631) 390-8216
Human Resources Department	1-(631) 843-5925
Regulatory/Quality Affairs Department	1-(631) 843-5847
Security Department	1-(631) 843-5923



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