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This Code of Business Conduct (“**Code**”) reflects the standards followed by Hu-Friedy Mfg. Co., LLC and all of our dental corporate affiliates and subsidiaries (collectively, “**HuFriedyGroup**” or “**HFG**”) in conducting our business. This Code applies to all of HFG’s associates when conducting job-related activities or otherwise representing HFG (“**Associates**”). We also expect anyone else working with us or acting on our behalf, such as our consultants, contractors, suppliers, channel partners and other business partners (collectively “**HFG Partners**”) to act consistently with this Code and HFG policies where applicable. HFG policies are available to all Associates and HFG Partners.

## **CORE VALUES**

- **CUSTOMER:** We are committed to customer-centric decision making. Every decision we make, from product development to customer service, is based on understanding and meeting the needs of our customer.
- **ACCOUNTABILITY:** We say what we mean and honor our commitments. We hold ourselves, and each other, accountable for our actions and our results.
- **TEAMWORK:** We have an unwavering commitment to supporting each other, taking care of each other, and believing in each other.
- **RESPECT:** We thrive through our diversity, respect the differences between us, and celebrate the value each of us brings to the organization.
- **INTEGRITY:** We believe in conducting our business in an honorable way - seeking “win-win” solutions in all our interactions.
- **EXCELLENCE:** We strive for excellence in all that we do, inclusive of the overall customer experience, innovation, product quality, continuous improvement, partner relationships and overall business results.
- **SAFETY:** We are committed to prioritizing the environment, health, and safety (EHS) of our teammates and the communities we operate in, in addition to the security and integrity of our enterprise-wide technology and data.

## **YOUR RESPONSIBILITY, REPORTING, AND ANTI-RETALIATION POLICY**


**Responsibility.** You have a responsibility to yourself, other Associates and HFG to conduct business legally and ethically and help us sustain a work environment that promotes honesty, integrity, respect, trust, diversity and responsibility. To this end, please carefully review, understand and comply with this Code and all applicable HFG policies, and always carry out your business activities ethically, responsibly, and lawfully.

If you are ever unsure about your responsibilities, or have any other questions regarding this Code or any HFG Policy, contact your manager, the HFG Legal Department or any of the other resources provided in this Code.

**Reporting.** Everyone must do their part to maintain HFG’s high standards for ethics and integrity. If you suspect a violation, are uncertain of the “right thing to do” or have any other concerns or questions, contact your manager, Human Resources, the Legal Department or any of the other resources in this Code. If you feel you cannot effectively report your concern this way, you can also report by phone via our **Speak-Up Hotline** or online via our **Speak-Up Webline**. Both are staffed by an independent third-party ethics and compliance specialist (NAVEX Global) and allow you to ask questions, seek guidance and report violations 24 hours a day, 7 days a week. Although a summary report of all reported violations will be provided to HFG, if you choose to remain anonymous, your identity will not be disclosed to HFG. More information about Speak-Up Reporting is available at <http://hufriedygroup.ethicspoint.com/>.

**Hotline:** 1-844-787-0215

**Webline:** <http://hufriedygroup.ethicspoint.com/>  
<http://hufriedygroupmobile.ethicspoint.com/> (mobile)

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**Anti-Retaliation Policy.** HFG has a strict anti-retaliation policy and does not tolerate any form of retaliation against another individual for good faith reporting of a violation of this Code or any other HFG policy. Acts of retaliation are subject to disciplinary action appropriate to the situation. If you feel you have been retaliated against, contact the Legal Department.

## **HFG WORKPLACE**

Associates must conduct themselves in a manner that is appropriate for the work environment and consistent with our values.

**Human Rights and Labor Rights.** We are committed to upholding human rights. We oppose and prohibit all forms of slavery, forced labor, child labor, and any other form of coerced labor in our operations, our supply chain, and by HFG Partners.

**Harassment and Discrimination.** We are committed to an environment free from harassment and discrimination. We prohibit harassment (including bullying) and discrimination due to age, sex, gender, pregnancy, race, color, disability, genetic information, national origin, sexual orientation, gender identity, religion, military or veteran status, and any other legally protected characteristic.

**Workplace Violence.** HFG does not tolerate violence of any kind in the workplace, including physically or verbally threatening or intimidating others at any time and for any reason, and acts of vandalism, arson, or other criminal activities. Except as otherwise permitted by local laws, weapons are not allowed on any HFG property unless specifically authorized by HFG.

## **COMPLIANCE**

HFG complies with applicable laws and regulations in all places where we do business and holds every Associate responsible for doing so as well.


**Anti-Bribery and Anti-Corruption.** Bribery is offering, promising, giving, demanding, or accepting anything of value to obtain any business, financial or commercial advantage. Corruption is the misuse of public office or another position of authority for personal gain. Bribery and corruption are unlawful and strictly prohibited. Associates and others acting on HFG's behalf are prohibited from authorizing, paying, promising, or offering anything to any individual or entity to improperly influence such individual or entity or to gain a business advantage. Any Associate who accepts or requests a bribe is considered to have committed an unlawful act.

**Fair Competition Laws.** Associates must comply with all fair competition laws, which laws help ensure markets operate fairly and efficiently. For example, Associates may not make any arrangements with any HFG competitor:

- On prices charged or other terms of sales, regardless of the economic impact
- On production volumes
- To avoid competing on bids or projects
- To refuse to deal or transact with select customers or suppliers

**Global Trade Compliance.** When importing and exporting goods globally, we must comply with various law and regulations, such as anti-boycott regulations and those that prohibit doing business with certain entities, individuals, or countries where trade-restrictions are in place. Associates must remain watchful for the intended end-destination of our products. If trade practices are questioned, or if you have doubts about how to interpret the regulations for certain countries, contact the Legal Department.

**Dealing with Government.** HFG customers include government entities. The laws and regulations governing transactions with governmental entities impose special rules and requirements. Recruiting and employing former or current government officials or employees is also subject to special laws and possible restrictions. These rules may also apply to their family members.

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**Political Activity.** We support Associates' rights to participate in the political process. Associates may make political contributions on an individual basis. Associates may not, however, commit HFG resources to political campaigns without approval from the Legal Department.

### **HEALTHCARE LAWS AND HEALTHCARE PROVIDERS**

HFG complies with laws and regulations governing the development, manufacturing, distribution, marketing, contracting, sale and promotion of our products and services. This includes those of the United States Food and Drug Administration ("FDA") and similar agencies in other countries.

The quality and safety requirements for the products and services we provide are extensive and complex. Associates must make certain that our products and services comply with all applicable rules, regulations, and guidance, and adhere to controls regarding product regulatory approvals, good manufacturing practice requirements, design, labeling, advertising, and other applicable controls.

Marketing of our products and services must be done honestly and with integrity. False or misleading advertising of a product or service or inaccurately documenting our products' or services' evolution is unethical and can lead to disciplinary action.

We also hold our suppliers accountable to ensure the quality of the products and services they provide to us.


If you have any concerns or questions regarding quality, safety, or legal compliance of our products or services, please contact your manager, or the Quality Assurance, Regulatory Affairs, or Legal Departments.

**Promotional Activities.** We follow applicable laws and regulations regarding our promotional activities, and educational and commercial relationships with healthcare providers. We promote and sell our products based on their approved labeling, and through accurate and truthful communications. All information provided about our products and services must be truthful, balanced, and supported by data and relevant experience. All materials promoting our products and services must be reviewed and approved through the proper channels. If you have any concerns or questions about our promotional activities, contact the Marketing, Quality Assurance, Regulatory Affairs, or Legal Departments.

**Interactions with Healthcare Providers.** Associates who interact with healthcare providers in the course of conducting business must comply with certain legal restrictions pertaining to interactions with healthcare providers, and applicable HFG policies. For example, there are laws and regulations relating to payments, gifts, entertainment, donations, meals, and meeting locations when interacting with healthcare providers.

### **ENVIRONMENT, HEALTH, AND SAFETY**

**Environment.** HFG is committed to sustainability and creating a healthier and safer world by reducing waste, using resources responsibly, integrating sound environment practices, and considering environmental impact. Associates are encouraged to be proactive and look for ways to reduce waste and use resources more efficiently.

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**Workplace Health, and Safety.** We are committed to providing a healthy and safe workplace for Associates and others on our facilities and expect Associates to share the same commitment. Associates must understand how to be safe at work and follow the appropriate policies and procedures, such as wearing appropriate personal protective equipment, knowing where exits are in case of fire and being aware of who to call for help should a safety concern arise. Associates must immediately report any hazardous or unsafe observations and any work-related injuries to their manager or the Environmental, Health and Safety Department.

### **DATA PRIVACY**

HFG is committed to protecting the data privacy of Associates, HFG Partners, and our customers, and complies with all applicable data protection and privacy laws.

The data we collect, use and store about our associates, customers, and HFG Partners are confidential, should not be shared with anyone without proper authority, and should only be used for HFG's legitimate business purposes. Such data may be transferred by HFG between jurisdictions for purposes outlined in our policies, in which case HFG will take legally required measures to protect the transferred data.

We take appropriate technical and organizational measures to help protect against unauthorized disclosure, processing, accidental loss, or destruction of, or damage to, such data. Associates who handle such data must do so in accordance with HFG policies and report any suspected security incidents to their manager or the Legal Department.

### **THIRD PARTY RELATIONSHIPS**

Relationships between HFG and the entities with which we do business, including customers, suppliers, agents, distributors, and regulatory agencies, must be ethical, compliant with this Code, HFG policies, applicable laws and regulations, and in HFG's best interests.


HFG fosters an environment that incentivizes our business partners to work with us by treating them lawfully, ethically and fairly. Associates must never take unfair advantage of anyone, including manipulation, concealment, abuse of confidential information or intellectual property, misrepresentation, or any other unfair business practice.

Associates must select business partners based on need, quality, service price, and other relevant considerations, and make business decisions that are in HFG's best interests and not motivated or influenced by personal considerations.

We will only do business with business partners that comply with applicable legal requirements and meet our standards, including those relating to human rights, labor, the environment, health and safety. Associates should watch for any signs that our business partners are violating this Code or applicable laws and regulations, including bribery and corruption, environmental, employment, human rights, and safety laws and regulations.

### **HFG ASSETS**

**Accounting Information and Records Management.** Certain laws require accurate recording of transactions, including sales of property, inventory, and services. Associates will comply with all such laws and record all exchanges of HFG funds within the framework of generally accepted accounting principles. Any "off the record" transaction is strictly prohibited. Destruction of any documents or records, especially of a financial nature, before the end of the applicable retention period provided by law or HFG policy is prohibited and subject to penalties. Falsifying records, nondisclosure of transactions, or destroying documents to avoid legal responsibilities are violations of this Code and can lead to civil or criminal liability. Contact the Finance or Legal Departments if you have questions or concerns about recordkeeping requirements.

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**Confidential Information.** Confidential information is information not generally known or readily available to others outside of HFG. Examples of confidential information include technical know-how and data, trade secrets, business plans, marketing and sales programs, and sales figures. It also includes information related to mergers and acquisitions, divestitures, licensing activities, and changes in senior management. Personal information about Associates, such as salaries, benefits, and information contained in personnel files is also considered confidential.

Associates may have access to confidential or proprietary information owned by or entrusted to HFG. Such confidential information must not be disclosed to third parties without appropriate approvals or used for any purpose other than HFG's legitimate business purposes.

**Intellectual Property.** Intellectual property refers to the inventions, ideas, brands, and original work that may provide a competitive advantage in the marketplace, and includes our trademarks, copyrights, and patents.

Any unauthorized disclosure or misuse of HFG's intellectual property may be harmful to HFG or our business partners. All associates who create intellectual property must follow HFG policies and processes for identifying and protecting that intellectual property. Third-party intellectual property should only be used in accordance with the terms of the applicable license or other legal right to such use.

### **CONFLICTS OF INTEREST**

A conflict of interest exists when an Associate has a private interest that is likely to negatively influence or conflict with their duties at HFG or HFG's interests. Associates must avoid such conflicts of interest. If it is not avoidable, they must disclose the conflict to their manager and follow any guidelines or procedures provided to Associate to mitigate the conflict.

**IF YOU HAVE ANY QUESTIONS REGARDING THIS CODE OR ANY HFG POLICY, CONTACT YOUR MANAGER OR THE HFG LEGAL DEPARTMENT.**

*Hu-Friedy Mfg. Co., LLC  
1666 E Touhy Ave, Des Plaines, IL 60018*