

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (“**Code**”) applies to all suppliers of Hu-Friedy Mfg. Co., LLC and all of our dental corporate affiliates and subsidiaries (collectively, “**HuFriedyGroup**” or “**HFG**”). All suppliers that conduct business with HFG (“**Supplier**”) must comply with this Code and HFG’s other policies to the extent applicable to Supplier, including without limitation HFG’s Code of Business Conduct. Such policies are available to all Suppliers on our website www.hufriedygroup.com and/or upon request.

HFG believes in conducting business with integrity and honesty and in accordance with all applicable laws and regulations of the countries in which it operates and expects Suppliers to do the same. This Code provides our minimum requirements and expectations from Suppliers, which we expect our Supplier to meet, if not exceed.

1. **Scope.** This Code applies to all Suppliers and all of Suppliers’ employees, parents, subsidiaries, affiliated entities and subcontractors. HFG expects Suppliers to communicate this Code to their employees, parents, subsidiaries, affiliated entities, agents and subcontractors and also require their next tier suppliers to acknowledge and implement this Code.
2. **Publicity, Confidentiality and Intellectual Property.** HFG prohibits the public disclosure of its name, logo, likeness, supplier relationships, products, parts, designs and any other non-public information, including without limitation, in any press release, prospectus, offer to do business, customer list, or website, without our prior written authorization. Suppliers must not disclose to others and will not use for their own purposes or the purpose of others, any trade secrets, confidential information, knowledge, designs, data, skill or any other information considered or designated by HFG as “confidential” or “non-public”. Suppliers must safeguard and make only HFG permitted and appropriate use of confidential information and ensure that all of their employees, parents, subsidiaries, affiliated entities and subcontractors do the same. Suppliers must ensure against any unauthorized disclosure or misuse of any HFG designs, specifications and other intellectual property or trade secrets, and will use the foregoing only as permitted by HFG.
3. **Documentation and Records.** Suppliers must completely and accurately record and report all business information, and create, retain and dispose of business records, in full compliance with applicable legal and regulatory requirements.
4. **Anti-Bribery and Anti-Corruption.** Suppliers must comply with all applicable anti-bribery and anti-corruption laws of all of the countries in which they conduct business, which may include without limitation, the UK Bribery Act, the Brazil Clean Company Law, and the United States Foreign Corrupt Practices Act (“**FCPA**”). Suppliers may not make any direct or indirect payments or promises of payment to foreign government officials or others with the intent to improperly influence such individual or entity or to gain a business advantage.
5. **Fair Competition.** Suppliers must comply with all fair competition laws, which help ensure markets operate fairly and efficiently. Suppliers will not collude with others in any way that may result in unfair competition, including colluding on prices or other terms of sales, production volumes, avoiding competing on certain bids or projects, refusing to deal or transact with certain customers or suppliers.
6. **Healthcare Laws.** Suppliers understand HFG is a medical device manufacturer and is therefore subject to certain laws and regulations pertaining to medical devices and regulatory agencies for such products, like the United States Food and Drug Administration (“**FDA**”). The quality and safety requirements for our medical device products and services are extensive and complex. Suppliers must make certain that the products and services they provide to HFG 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. HFG will hold Suppliers accountable to ensure the quality of the products and services they provide to HFG.
7. **Gifts and Entertainment.** Suppliers will not offer or accept any gifts or entertainment that may be construed as intended to influence the judgment of the recipient to secure unfair preferential treatment or gain improper advantage, or that in any way may violate applicable laws or regulations. Suppliers understand that HFG is a medical device manufacturer and is therefore subject to certain anti-gift and other laws and regulations applicable to medical device manufacturers such as the Anti-Kickback Statute. Suppliers must comply with all such laws and regulations to the extent applicable to Suppliers and will not engage in any activity that may cause HFG to be found to be in violation of such laws and regulations.
8. **Tax Compliance.** Suppliers must comply with all applicable tax requirements, including but not limited to payroll tax, value added tax (VAT), goods and services tax, income tax, sales tax, customs and import duties, use tax and property tax. Suppliers must not illegally evade taxes through any means, including, but not limited to, underreporting income, inflating deductions or expenses, laundering money or concealing funds in offshore accounts.
9. **Sustainability and Social Responsibility.** HFG expects Suppliers to conform to business practices that preserve and protect the environment, contribute to the social well-being of the communities in which they do business or have operations and demonstrate accountability and transparency in sustainability performance. Suppliers must conserve natural resources, avoid the use of hazardous materials where possible and promote activities that reuse and recycle.
10. **Import/Export laws.** Suppliers must comply with all applicable trade laws of the United States, the European Union, and all other countries relating to import/export matters. This includes timely provision of all information necessary to comply with import

requirements of the United States or other countries of destination, and not exporting any products from HFG to any proscribed country listed in the U.S. Export Administration Regulations. Suppliers will state the country of origin on goods, packaging and invoices as well as provide proper documentation to support available free trade agreement claims.

11. **Facility and Supply Chain Security.** Suppliers must maintain adequate security at all of its facilities and implement supply chain security procedures designed to prevent the introduction of non-manifested cargo into outbound shipments (e.g. drugs, explosives, bio-hazards or other contraband) in alignment with applicable law, including the principles of the U.S. Customs and Border Protection's Customs-Trade Partnership Against Terrorist (C-TPAT) program. Suppliers agree to provide required certification or security questionnaire responses related to C-TPAT. Additionally, each Supplier facility must have written security procedures and maintain documented proof of the adequate controls implemented to guard against introduction of non-manifested cargo.
12. **Data Privacy and Security.** Suppliers must comply with all applicable data privacy and data security laws. Suppliers must take appropriate technical and organizational measures to help protect against unauthorized disclosure, processing, accidental loss, or destruction of, or damage to, data provided by or belonging to HFG. Suppliers will use such data only to the extent required in order to provide products and services to HFG and in accordance with HFG's Privacy Policy and applicable laws.
13. **Conflicts of Interest.** Suppliers must avoid the appearance of improprieties or conflicts of interests. Suppliers must not deal directly, including engaging in contract negotiations, with any HFG employee who has a financial interest in the Supplier. Similarly, Suppliers must not deal directly with any HFG employee that is a spouse, domestic partner, family member or relative of the Supplier. It is the obligation of both the Supplier employee and the HFG employee to proactively disclose any of the aforementioned relationships.
14. **Responsible Sourcing/Conflict Minerals.** HFG is committed to sourcing components and materials from Suppliers that share our values regarding respect for human rights, integrity and environmental responsibility. Suppliers will not directly or indirectly utilize or supply to HFG any materials, parts or services that may violate any law or regulation, including without limitation the origin of the materials, parts or services. Suppliers must have a policy to reasonably assure that any tantalum, tin, tungsten and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country and exercise due diligence on the source and chain of custody of these minerals. Suppliers agree to provide such policies and due diligence measures to HFG upon request. HFG surveys Suppliers for risk of these conflict minerals. HFG's Procurement Team is trained to recognize the risks of these conflict minerals and to report any suspected conflict minerals. HFG will promptly investigate and take immediate action if it suspects these conflict minerals in its supply chain.
15. **Working Hours and Wages.** Suppliers will comply with all applicable laws and regulations with regard to workers' compensation. They will meet applicable minimum wages, legally required overtime rates, and provide any other applicable statutory benefits. Suppliers will ensure their workers do not work more than the maximum hours permitted under applicable law.
16. **Modern Slavery and Human Trafficking.** HFG is committed to human rights and strictly prohibits modern slavery and human trafficking in its business and its supply chains. Suppliers will not engage in such practices or any harsh or inhumane treatment, coercion or verbal abuse of its workers. Suppliers will not impose any unreasonable restrictions on workers' freedom of movement and allow workers to freely enter and exit Suppliers' facilities. All workers will also be free to terminate their employment. HFG has practices in place to help avoid complicity in these activities. HFG surveys Suppliers for risk of human trafficking or slavery. HFG's Procurement Team is trained to recognize the risks of slavery and trafficking and report any such suspected activity. HFG will promptly investigate and take immediate action if it suspects slavery or trafficking is taking place within HFG or its supply chain.
17. **Non-Discrimination.** Suppliers agree to make all hiring and employment decisions solely on the basis of the skill, ability and performance of workers and will not discriminate on the basis of race, color, religion, gender, sexual orientation, gender identity and expression, political opinion, national origin or any other legally protected class or attribute.
18. **Reporting and Anti-Retaliation.** HFG encourages Suppliers to reach out to HFG with any questions or concerns regarding this Code. Suppliers agree to promptly report to HFG any actual or suspected breach of this Code, whether the violation may be attributed to Supplier or a third party. If any Supplier is in violation of this Code, HFG may execute disciplinary action, suspend current product or future orders, or terminate the business relationship. HFG reserves the right to hold Suppliers responsible for reasonable costs of investigating non-compliance. HFG does not retaliate, and prohibits retaliation, against any individual for good faith reporting of a violation of this Code or any other HFG policy. Suppliers can contact HFG by reaching out to their HFG contact or by emailing HFG's Compliance Officer at compliance@hu-friedy.com. Suppliers can also reach out through HFG's Speak-Up Hotline or online Speak-Up Webline. Both are staffed by an independent third-party ethics and compliance specialist and available 24 hours a day, 7 days a week. Although a summary report of all reported violations will be provided to HFG, reporters may choose to remain anonymous. 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)

19. **Audits.** Suppliers agree that HFG may audit Suppliers to ensure their compliance with this Code and Suppliers will cooperate with HFG in such audit.