

# Patterson Companies, Inc. Business Partner Compliance Standards

Patterson is committed to doing business responsibly and expects its suppliers, resellers, distributors, agents, consultants, manufacturers, and other business partners ("Partners") to maintain the same ethical and compliance expectations outlined within the Company's Business Partner Compliance Standards ("Standards"). We require our Partners to uphold the human rights of workers, fully comply with applicable laws and regulations, and adhere to internationally recognized environmental, social, and product quality expectations. Partners should communicate these expectations throughout their organization, and by accepting to engage with Patterson, Partners acknowledge and accept the principles outlined in the Standards.

### **Corporate Social Responsibility**

Patterson is aware of the impacts its business operations can have on society and the environment and is committed to being socially accountable and conducting business in a manner that enhances society and the environment. Patterson extends this responsibility throughout its supply chain and to its Partners and encourages its Partners to embrace the same level of transparency and values related to the social topics included within the Standards. Patterson strives for continuous improvement, encourages and embraces transparency on corporate social responsibility topics, and is committed to collaborating with our Partners to meet—and potentially exceed—the expectations outlined in these Standards.

## **Labor and Human Rights**

#### Child Labor

Patterson does not tolerate any form of child labor or exploitation within its supply chain and is committed to eliminating child labor from its supply chain as defined within the International Labour Convention Nos. 138 and 182. "Child" shall be defined as any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. We expect our Partners to support and participate in industry efforts aimed at identifying and eliminating child labor wherever it exists within the supply chain.

### Human Trafficking and Forced/Prison Labor

Partners will not utilize or benefit in any way from forced or compulsory labor nor utilize factories or subcontractors that force unpaid labor, including—but not limited to—all forms of slavery, prison, and indentured and bonded labor. All work must be voluntary, giving workers the freedom to terminate their employment at any time. Partners must not retain any personal identification, travel documents, or wages as conditions of employment. The recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force, coercion, or other means, for the purpose of exploiting them is prohibited.

### Non-Discrimination

Equal treatment of all employees should be essential to the Partner's corporate values. Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, should be made solely based on the skill, ability, and the



performance of workers. Discrimination is not permitted on the basis of race, religion, gender, age, physical characteristics, political opinion, national extraction, social origin, disability, union membership, family status, pregnancy, sexual orientation, gender identity, gender expression, or any unlawful criterion under applicable law. An inclusive working environment that promotes diversity should be encouraged.

### Harassment

Patterson does not tolerate any form of mistreatment in the workplace. All workers will be treated with dignity and respect and will not be subject to any form of unethical treatment, sexual harassment, sexual abuse, corporal punishment, or torture, mental, physical, or verbal coercion, or the threat of any such treatment. Disciplinary policies and procedures in support of these requirements should be clearly defined and communicated to each worker.

### Working Hours, Wages, and Benefits

Partners should provide wages at least equal to the applicable legal minimum wage and any associated statutory benefits. If there is no legal minimum wage, Partners must ensure that wages are at least comparable to those at similar companies in the local area or to prevailing industry norms. Working hours, overtime hours, schedules, and rest periods should reflect applicable legal norms and overtime hours should be paid at the legally mandated premium or at least at the same rate as regular hours worked if there is no mandated premium. Benefits should be at least equal to any associated statutory benefits.

### Freedom of Association and Collective Bargaining

Partners should respect all employees' right to freely associate, join labor unions, seek representation, join work councils, and engage in collective bargaining. Employees shall be permitted to communicate openly and constructively to share grievances without fear of retribution, retaliation, or reprisal.

#### **Ethics and Compliance**

### **Business Integrity**

Patterson is committed to doing business ethically and lawfully. Partners must not directly or indirectly provide or receive improper business advantages by offering, giving, or receiving anything of value in exchange for preferential treatment. This includes prohibitions on bribing, extortion, embezzlement, conflicts of interest, falsification of documents, collusive bidding, price fixing, price discrimination, and unfair trade practices in violation of antitrust laws. Partners shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA) and other relevant international anti-corruption conventions.

### Conflicts of Interest

Partners will avoid any real or perceived personal and/or organizational conflicts of interest or other behaviors that may negatively impact Patterson. Partners will promptly advise Patterson if aware or suspicious of circumstances that may give rise to such a conflict or unethical behavior.



## Privacy and Intellectual Property

Partners will safeguard and take the appropriate steps to protect the privacy of the confidential and proprietary information belonging to Patterson. Partners will ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. Partners will also assure the appropriate electronic, administrative, physical, and technical controls around data privacy and security are in place including those applicable to standards set out in the General Data Protection Regulations (GDPR) and other relevant privacy guidelines and regulations.

### **Conflict Minerals**

Partners are committed to complying with federal laws and regulations requiring disclosure of the use of conflict minerals. Partners are expected to maintain a policy that strives to guarantee products supplied to Patterson do not contain metals derived from minerals or their derivatives originating from conflict regions that directly or indirectly finance or benefit armed groups. Partners will exercise and make available upon request due diligence on the source and chain of custody of these products.

### **Environment Health and Safety Conditions**

### **Environmental Regulations and Sustainability**

Environmental impact is a key part of Patterson's business practices, and the company is committed to supporting sustainable and responsible operational practices. At a minimum, Partners must fully comply with all Federal, State, Provincial, and local environmental laws and regulations and should strive to conduct their operations in a way that conserves natural resources. Partners will comply with all applicable quality, health, safety, and environmental regulations. All required permits, licenses and registrations will be obtained, maintained, and kept up to date.

#### Pollution Prevention and Resource Reduction

Partners should have systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. Any of these activities that have the potential to adversely impact human or environmental health will be appropriately managed, measured, controlled, and handled prior to release of any substance into the environment. Partners will have systems in place to prevent accidental spills and releases into the environment.

### Worker Health and Safety

Partners must provide a safe and healthy working environment for all employees. That includes a workplace free of harsh and inhumane treatment, along with the appropriate controls, safety procedures, preventative maintenance, and protective equipment for all hazards in the workplace. Education on safety information regarding hazardous materials and production processes should be made available. Practices must comply with all relevant local and national laws, codes, and regulations.



#### **Grievance Mechanisms**

Patterson expects Partners to provide grievance mechanisms that are transparent, responsive, and confidential to workers and other parties throughout the supply chain. Concerns reported to these mechanisms shall be addressed in a timely manner, and workers who speak up in good faith should be protected from retribution and retaliation. Partners should promptly notify Patterson's Compliance Department of any concerns or violations reported through a grievance mechanism that violates the Standards.

Violations and concerns may also be reported directly to Patterson's helpline, Speak Up Patterson, at <a href="https://www.speakuppatterson.com">www.speakuppatterson.com</a>. Speak Up Patterson is a third-party monitored, independent service available 24/7 in multiple languages via phone and internet to employees, business partners, and other parties.

### **Auditing and Compliance**

## Management Systems

Partners are expected to implement management systems to facilitate compliance with all applicable laws, regulations, contractual agreements, and generally recognized operational standards. Continuous improvement and enhancements to these management systems should occur.

## **Auditing**

Patterson reserves the right to verify the ongoing compliance with the Standards. This may be done through internal and external assessment mechanisms, such as questionnaires, surveys, and announced and unannounced onsite assessments. Such audits may inspect Partners' facilities, operations, and books and records. If non-compliances are found or otherwise reasonably suspected, the Partner will be required to implement correction actions. Patterson reserves the right to suspend its business relationship with the Partner if nonconformities are observed and/or the Partner refuses to effectively implement correction actions. In such circumstances, Patterson may also terminate its business relationship with the Partner in addition to any other rights or remedies available to the Company.

\*\*\*\*\*\*

#### **Compliance with Standards**

#### **Accountability**

Patterson has assigned to our Chief Compliance & Regulatory Officer overall accountability for tracking and responding to issues and questions relating to, and reported violations of, these Standards. If our Chief Compliance & Regulatory Officer receives information regarding an alleged violation of these Standards, he or she or such other authorized person will investigate the alleged violation. Partners are required to cooperate fully with any inquiry or investigation relating to an alleged violation of these Standards. Any failure to cooperate with any inquiry or investigation is itself a violation of these Standards and may result in disciplinary action, including, potentially, termination. Consequences of Violation of Standards, Patterson's policy is to take prompt action to enforce these Standards and all our other



policies. Depending on the seriousness of the violation and the other relevant circumstances, violations of these Standards may result in a formal or informal warning or reprimand, or other disciplinary action. Certain violations of these Standards may require Patterson to refer the matter to the appropriate governmental authorities for criminal prosecution. Action, which may include suspension or termination of engagement. We reserve the right to amend or alter these Standards at any time for any reason. This document does not serve as a contract between us and Partners and/or any Partners employees.

If you have any additional questions about the Standards, please contact Patterson Companies, Inc. at <a href="mailto:Compliance@pattersoncompanies.com">Compliance@pattersoncompanies.com</a>.