



## **Comprehensive Compliance Program and Declaration**

### **INTRODUCTION**

Henry Schein One, LLC (“HSONe”, “Company”, or “we”), a joint venture company part of the Henry Schein, Inc. family (“HSI”), is committed to high standards of ethical conduct and corporate compliance. To that end, we follow HSI’s Comprehensive Compliance Program, as applicable to our Company, which was designed to incorporate key elements set out in the Compliance Program Guidance for Pharmaceuticals issued by the U.S. Department of Health and Human Services Office of Inspector General (OIG). The OIG’s Compliance Program Guidance provides relevant information for healthcare company compliance programs.

The purpose of the Comprehensive Compliance Program is to prevent, detect and remediate violations of HSI standards and applicable law. We describe below the fundamental elements of the Comprehensive Compliance Program, which has been tailored to fit our size and resources, as well as the unique interactions that the Company has as a software and SaaS company. As envisioned by OIG’s Compliance Program Guidance, we endeavor to continually improve the Comprehensive Compliance Program in response to ever-evolving business activities, applicable laws, and associated compliance risks.

### **COMPREHENSIVE COMPLIANCE PROGRAM**

#### **Written Policies and Standards**

We have adopted written policies and standards that provide guidance to our Team Schein Member employees (“TSMs”) in their dealings with health care professionals, customers, suppliers, government entities, society at large, other employees, and other third parties. They also address the methods and means by which the Comprehensive Compliance Program is administered and enforced.

Our policies and procedures, guidelines, directives and other communications address applicable federal, state and foreign laws and industry standards relating to the marketing, promotion, distribution and sale of the Company’s products and services. HSONe has also adopted a Marketing Code of Conduct Policy governing interactions with healthcare professionals.

In addition, HSONe has set annual dollar limits on items or activities of value (as defined under applicable law) that the Company provides to each individual health professional (in California, \$2500 per covered recipient per year).

#### **Leadership and Oversight**



Our Company works closely with the HSI Compliance Program under the leadership of its Chief Ethics and Compliance Officer (“CECO”) who has overall responsibility for managing and overseeing HSI’s Compliance Program and is empowered with appropriate authority to exercise independent judgment.

In order to assist the CECO in implementing, executing and monitoring the Comprehensive Compliance Program, our Company’s legal team and senior management assists the CECO, as needed, in implementing the Compliance Program.

### **Training and Education**

HSOne is committed to effectively communicating our standards and procedures to Company personnel. Our training activities include a combination of in-person presentations, online web modules, printed materials, and individualized sessions. HSOne periodically reviews and updates its training programs and identifies additional areas of training on an “as needed” basis.

### **Communication and Helpline Reporting**

HSOne encourages open and candid discussion between management and TSMs regarding any compliance concerns. Our goal is that all TSMs, when seeking answers to questions or reporting potential instances of misconduct, should know to whom to turn for a meaningful response and should be able to do so without fear of retaliation. TSMs are encouraged to report their concerns to a) their manager, b) the Compliance Helpline, c) the Ethics & Compliance Department, d) the General Counsel’s office or local Legal department if outside the U.S., (e) their local Human Resources contact, or (f) other senior Company official. HSI maintains a Compliance Helpline that is available to the Company through a third-party vendor with a toll-free number (by country) and web portal to receive reports from TSMs and others in connection with alleged violations of our standards or applicable laws by any TSM, contractor, subcontractor, supplier, customer, or other person. Reports to the Compliance Helpline may be made anonymously, if desired.

### **Risk Assessment, Auditing and Monitoring**

HSOne periodically assesses the risk of misconduct and takes reasonable measures to design, implement, or modify each element of the compliance program, as required. We conduct a risk assessment using a risk-based approach and conduct compliance audits periodically to evaluate adherence to our policies and standards. The Company also monitors for new and emerging risk areas on an ongoing basis. The nature of our reviews, as well as the extent and frequency of our compliance monitoring and auditing, varies according to a variety of factors, including new regulatory requirements, changes in business practices, and other considerations.

### **Enforcement and Disciplinary Measures**



We conduct fair, diligent and timely investigations of reports of potential non-compliance that are brought to the Company's attention. We take disciplinary actions, where appropriate, in response to confirmed violations of the Company's standards, and strives to ensure consistent application of the Company's standards.

### **Responses to Detected Problems and Corrective Actions**

An effective compliance program increases the likelihood of preventing and detecting unlawful and unethical behavior. However, even an effective compliance program may not prevent all violations. Accordingly, the Comprehensive Compliance Program requires a prompt response to potential violations of law, standards or Company policy. Actions in response to detected problems, and to prevent future violations, may include improving policies or procedures, training, communication and monitoring or disciplinary action.

### **DECLARATION OF COMPLIANCE WITH CALIFORNIA HEALTH AND SAFETY CODE §§119400-119402**

We have adopted a Comprehensive Compliance Program guided by OIG's Compliance Program Guidance for Pharmaceuticals and industry standards. We tailored our Comprehensive Compliance Program to the nature of our business as a software and SaaS company. The California law makes reference to compliance with the PhRMA Code on Interactions with Healthcare Professionals (PhRMA Code), which is an industry standard that applies to pharmaceuticals and does not reflect the unique nature of our business. We have, accordingly, not adopted the PhRMA Code, but instead have adopted a marketing code of conduct intended to help ensure our compliance with applicable laws and regulations and consistent with industry standards for healthcare-related software and SaaS companies. We believe that our Comprehensive Compliance Program meets the compliance goals set forth by California Health and Safety Code sections 119400 through 119402 as applicable to our Company. To our knowledge, we are, in all material respects, in compliance with our Comprehensive Compliance Program and any applicable requirements of California Health and Safety Code sections 119400 through 119402, as we interpret and apply the requirements to the nature of our business. Although we are not making a representation that every employee and agent will always fully comply with our standards and rules, our Comprehensive Compliance Program is reasonably designed to prevent and detect violations. We are committed to monitoring our conduct and taking appropriate action to discipline Company personnel who violate our standards. Copies of this declaration and the above description of our Comprehensive Compliance Program may be obtained by calling the Compliance Helpline: 1-877-285-4157 (for the United States and Canada) or by visiting the Company website.

Dated: June 29, 2023