
COMP 275.0

GLOBAL SUPPLIER CODE OF CONDUCT

Purpose and Scope

At Covetrus, Inc. (“Covetrus” or the “Company”), we believe acting ethically and responsibly is not only the right thing to do, but also the right thing to do for our business. Covetrus has developed this Global Supplier Code of Conduct (“Supplier Code”) to clarify our global expectations in the areas of business integrity, labor practices, employee health and safety and environmental management. This Supplier Code is intended to complement Covetrus’ *Code of Business Conduct & Ethics* (available under the Investors section of our website at www.covetrus.com) and Covetrus’ other policies and standards referenced therein.

Suppliers, vendors, and other providers of goods and services who do business with Covetrus entities worldwide (“Suppliers”) are expected to follow this Supplier Code.

Business Conduct Principles

Covetrus expects its Suppliers to conduct business responsibly, with integrity, honesty and to adhere to our values and the following principles:

1. Maintain awareness of, and comply with, all applicable laws and regulations.

Suppliers shall maintain awareness of, and comply with, all applicable laws and regulations.

2. Compete fairly for business, without paying bribes, kickbacks or giving anything of value to secure an improper advantage.

Covetrus is committed to conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, government officials or other third parties by Suppliers are strictly prohibited. “Corruption” generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage (for oneself or third parties) through dishonest or illegal means.

3. Encourage a diverse workforce and provide a workplace free from discrimination, harassment or any other form of abuse.

Suppliers shall create a work environment in which employees and business partners feel valued and respected for their contributions. Harassment, including unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment will not be tolerated. Suppliers shall not discriminate in employment, including with regard to hiring, compensation, advancement, discipline, termination and retirement, in violation of the laws and regulations, including on the basis of alienage or citizenship, age, color, creed, disability, gender identity, genetic characteristics, marital status, domestic violence victim status, conviction record, military status, national origin, pregnancy, childbirth-and pregnancy-related medical conditions, race, religion, sex/gender, sexual orientation, or veteran status.

4. Treat employees fairly, including with respect to wages, working hours and benefits.

Suppliers shall comply with all applicable laws and regulations and will generally apply sound employee relations practices. Working hours, wages and benefits will be consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits.

5. Prohibit all forms of forced or compulsory labor.

Suppliers shall maintain and promote fundamental human rights. Employment decisions will be based on free choice and may not involve forced or prison labor, physical punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control.

6. Prohibit use of child labor.

Suppliers shall adhere to the minimum employment age limit defined by applicable laws or regulations and comply with applicable International Labor Organization standards. In no instance shall a Supplier permit children to perform work that exposes them to undue physical risks that can harm physical, mental or emotional development or improperly interfere with their schooling needs.

7. Respect employees' right to freedom of association and collective bargaining, consistent with applicable laws and regulations.

Consistent with applicable laws and regulations, Suppliers shall respect employees' rights to join or refrain from joining associations and worker organizations. Supplier will permit workers to openly communicate and share grievances with management about working conditions and management practices without fear of reprisal, intimidation or harassment.

8. Provide safe and healthy working conditions.

Suppliers shall proactively manage health and safety risks to minimize occupational injuries and illnesses. Suppliers must implement management systems and controls that identify hazards and assess and control risk related to their specific industry. Suppliers shall maintain records of work-related accidents, injuries or sicknesses and corrective actions.

9. Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

When making business decisions, Suppliers are to consider the potential environmental impact of their activities along with opportunities for conservation of natural resources, recycling, source reduction, and pollution control to ensure cleaner air and water, and to reduce landfill wastes.

10. Conflict Minerals.

Suppliers are expected to ensure that products supplied to Covetrus do not contain metals derived from minerals (or their derivatives originated from) conflict regions that directly or indirectly finance or benefit armed groups (including from the Democratic Republic of the Congo or an adjoining country).

11. Maintain accurate financial books and business records.

Suppliers shall maintain accurate financial books and business records in accordance with all applicable laws and regulations and accepted accounting practices.

12. Deliver products and services meeting applicable quality and safety standards.

Suppliers shall have adequate controls in place to ensure the integrity, quality and safety of their products and services provided by Supplier to Covetrus.

13. Support compliance with this Supplier Code by establishing appropriate management processes and cooperating with reasonable assessment processes requested by Covetrus.

Suppliers shall establish appropriate management processes and maintain records to comply with this Supplier Code. With prior notice, Covetrus may conduct reasonable audits to verify Supplier's compliance with this Supplier Code.

14. Observe Covetrus' policies regarding gifts and entertainment and conflicts of interest when dealing with Covetrus employees.

Suppliers are prohibited from providing or offering gifts to Covetrus employees that could inappropriately influence Covetrus' business decisions or gain an unfair advantage.

15. Report suspected violations of this Supplier Code.

Suppliers' employees or agents may report suspected violations of this Supplier Code to the Covetrus EthicsPoint Hotline, which is available worldwide, 24 hours a day, 7 days a week by telephone at **1-844-476-9149** (toll-free in the United States and Canada; additional country-specific telephone numbers are available online), by email at compliance@covetrus.com, or online at <https://covetrus.ethicspoint.com>. All such reports are treated as confidential, where permitted by law, and the reporter may remain anonymous, where permitted by law. We note that anonymous report or call may be more difficult to investigate.

Acknowledged and Agreed:

By: _____ Date: _____
(Signature of Authorized Officer)

Name: _____
(Please Print)

Title: _____
(Please Print)

Supplier Name: _____
(Please Print)