

SUPPLIER CODE OF CONDUCT

I. SCOPE

This Code of Conduct (“Code”) applies to all Suppliers of any NVA business unit (NVA General Practice, NVA Canada, Ethos Veterinary Health, NVA Equine, and NVA Pet Resorts) (collectively, “NVA”).

“Supplier” refers to any entity or individual that provides goods, services, or labor to NVA under a contractual, purchase order, or other commercial arrangement. This includes manufacturers, distributors, service providers, consultants, contractors, or third parties acting on behalf of NVA.

Suppliers are responsible for ensuring their subcontractors, sub-suppliers, agents, and other third parties engaged in the delivery of goods or services to NVA comply with the standards in this Code. Suppliers must communicate the requirements of this Code to all relevant parties and take reasonable steps to monitor and ensure compliance. NVA reserves the right to request evidence of such communication and enforcement efforts.

II. GUIDING PRINCIPLES

NVA is rooted in a culture of care, collaboration, integrity and compassion. NVA is committed to exceptional care and our purpose is to give pets and the people who love them more quality years together.

NVA Suppliers play an important role in NVA’s purpose. By providing goods or services for and on behalf of NVA, you acknowledge that you will conduct yourself in accordance with this Code and its requirements and educate your employees and other representatives on its terms. Where this Code sets higher standards than what the law requires, NVA expects you to adhere to the higher standards. NVA encourages Suppliers to continually evaluate and improve their products, working methods, production processes, and services to exceed the minimum expectations in this Code.

NVA may update this Code from time to time, and any material changes will be highlighted on the Supplier portal. This Code supplements, but does not supersede, your contract with NVA. To the extent there is any inconsistency between this Code and any provision of your contract with NVA, the contractual provision will control.

III. RESPONSIBILITIES OF NVA SUPPLIERS

1. Ethical Behavior

NVA aspires to the highest standards of ethical conduct. We expect our Suppliers to aspire to these same standards in their business practices and daily interactions in such that they:

- Operate in full compliance with all applicable laws, regulations, and industry standards.

- Implement basic business principles in a code of conduct or similar policy, including such items as adherence to local laws and a stand against bribery and corruption, and train their workforce on such practices.
- Refrain from any form of corruption, including extortion, and bribery.
- Value free and fair competition throughout the world, comply with competition laws in all areas in which they operate, and implement strict policies in accordance therewith.
- Provide accurate and transparent information regarding the origin, composition, and manufacturing processes of all products supplied.
- Respect that NVA employees do not give or accept any gift or favor that could compromise or raise doubts about the neutrality of decisions made by NVA or its employees.
- Disclose to NVA any situation that may appear to be a conflict of interest, and disclose to NVA if any employee or family member of NVA may have an interest of any kind in Supplier's business or any economic ties to Supplier.
- Strive to maintain accounting and supporting documents, and upon reasonable notice, cooperate with NVA in reviewing those records relevant to their transactions with NVA.
- Avoid conflicts of interest and refrain from engaging in any activities that may compromise the integrity or impartiality of their relationship with NVA.
- Maintain an anonymous whistleblower hotline or similar grievance mechanism to report unethical or illegal business practices and ensure non-retaliation against whistleblowers.

2. Social Behavior

NVA expects its Suppliers to respect and uphold the human rights of their employees and others. Suppliers must:

- Prohibit the use of forced labor, including human trafficking, and give workers the right and ability to leave employment when they choose.
- Not import goods tainted by slavery or human trafficking.
- Use legitimate and reputable recruitment and employment agencies properly licensed to operate under applicable laws.
- Prohibit the use of child labor and ensure that employment of underage workers adheres to all applicable laws and regulations.
- Provide a safe work environment, abiding by local laws and regulations and respecting the health and well-being of its workforce.
- Provide appropriate personal protection equipment in line with standard workplace health and safety codes.
- Provide adequate training to employees on local workplace safety practices to help prevent accidents and injuries.
- Treat all employees fairly and not discriminate against any group in its employment practices.
- Provide clear and uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting mental, physical, or verbal abuse.
- Ensure that working hours are in accordance with applicable laws and regulations and industry practice, and that voluntary overtime is at manageable levels.
- Ensure that regular and overtime wages meet legally mandated minimums and industry standards without unauthorized deductions and are paid in a timely manner.

- Ensure the workforce receives breaks and other entitlements set by applicable law.
- Do not unlawfully hinder the rights of workers to legally organize and join associations such as labor unions.
- Engage in practices that promote the welfare of animals including the provision of an environment that is free from distress, cruelty, abuse, and neglect and that is consistent with all applicable laws and industry guidelines.
- Encourage and support the growth and development of minority and diverse business enterprises.

3. Environmental Behavior

Suppliers must contribute to NVA's environmental objectives through the following practices:

- Abide by all applicable environmental legislation and regulations, including any business operating licenses.
- Evaluate the impact of their activities on the environment and actively pursue initiatives that improve the environmental impact of their operations.

4. Safeguarding Information

NVA is committed to safeguarding the integrity, confidentiality, and lawful use of information across its operations. Suppliers play a critical role in upholding this commitment by respecting intellectual property rights, maintaining the confidentiality of sensitive business data, implementing robust security measures, and ensuring responsible handling of personal information. These expectations apply to all forms of data – digital, physical, and verbal – and extend to interactions with NVA employees, systems, and third parties. Without limitation, Suppliers shall meet the following requirements:

- Intellectual Property: Suppliers must respect NVA's intellectual property rights, including trademarks, copyrights, and proprietary technologies. Unauthorized use, reproduction, or disclosure is strictly prohibited.
- Confidential Information: Suppliers must treat all non-public business, financial, and operational information as confidential. Such information may only be used for its intended purpose and must not be shared without prior written authorization.
- Security: Suppliers are expected to maintain a security program with appropriate technical, administrative, and physical controls to protect NVA systems, data, and assets from unauthorized access, use, disclosure, or disruption.
- Privacy: Suppliers must handle personal data in accordance with applicable NVA policies and privacy and data protection laws. Supplier may use data only as agreed to by NVA, NVA employees, or NVA pet parents, as applicable. Suppliers are expected to cooperate with NVA's privacy compliance efforts.

5. Conduct of Supplier Representatives

NVA expects Supplier representatives to uphold high standards of professionalism, safety, and integrity when working on-site or participating in NVA-sponsored events. All Supplier representatives must follow

site-specific protocols, respect NVA values, and interact respectfully with all individuals on-site or at the event.

- Safety and Security
 - a. Supplier representatives should stay within their designated work areas and follow all safety instructions and signs.
 - b. Supplier representatives will exercise care when working on or around NVA devices and equipment to prevent damage and/or injury.
 - c. Supplier representatives are required to use any personal protective equipment necessary to safeguard their health and safety.
 - d. Supplier representatives must follow all contractual requirements between NVA and the Supplier, and all applicable federal, state, provincial and local laws regarding workplace safety.
- Personal Appearance
 - a. Supplier representatives should maintain a neat, well-groomed appearance and dress in a manner appropriate for the work environment and occasion when present at NVA sites or events.
 - b. Supplier representatives must visibly wear their visitor badges while at NVA sites or events.
- Business Conduct
 - a. Supplier representatives should follow basic and common-sense rules of conduct that respect and protect everyone's interests and safety.
- Confidentiality
 - a. Supplier representatives must not disclose confidential information gained while working in NVA sites or events.
 - b. Supplier representatives must follow contractual requirements regarding confidential information between NVA and the Supplier.

IV. ENFORCEMENT AND REMEDIES

You understand that failure to abide by this Code may result in NVA's immediate cancellation of all outstanding orders or termination of the Agreement, without penalty to NVA. NVA may request reasonable data and documentation to validate compliance with this Code and satisfy data requests from our own stakeholders. Alternatively, NVA may require you to develop and successfully execute a remediation plan.

V. HOW TO RAISE A QUESTION OR CONCERN

To report questionable behavior or a possible violation of this Code, please contact categorymanagement@nva.com or Ethos_Procurement@ethosvet.com or report to NVA's Integrity Line, our team member reporting hotline, at: nvaonline.ethicspoint.com or call toll-free at (844) 880-2599.