

OWENS & MINOR VENDOR CODE OF CONDUCT

Owens & Minor (O&M) is committed to collaborating with ethical companies who share our strong belief in business ethics, integrity and social compliance, around the globe. Our success depends on our partners and we are providing this vendor Code of Conduct to help you understand what we hold important.

This vendor Code of Conduct sets forth the basic requirements that all vendors, distributors, agents, suppliers, representatives, and other business partners and their employees, directors, officers, agents, representatives, and subcontractors (collectively referred to as “Vendors”). This is our standard and it must be followed to by all Vendors.

COMPLIANCE WITH THE LAW AND BASIC ETHICS

All Vendors are expected to comply with all applicable local, state, federal, and national laws and regulations of the jurisdiction in which you are doing business. In addition to the law, we also expect Vendors to adhere to business integrity basics including:

- **Anti-Bribery laws:** Anti-bribery laws are found globally, but nowhere is it more profound than in the U.S. and the UK. As an organization that conducts business in both of those countries, we need to know that our partners are going to abide by the rules in those locations, as well as where they live and work. This law is number one on this list for a reason!
- **Privacy laws and regulations:** All vendors must comply with country specific laws and regulations related to privacy. Data privacy is no longer just a local or country specific concern, regulations in Asia/Pacific, EMEA, and the Americas now make it a global concern. For information on Data privacy at Owens & Minor, and to help you understand its importance, you can reach out to GM-Privacy@owens-minor.com – we are experts in privacy and we can help you, our partner, further protect your organization.
- **Healthcare law:** O&M is committed to compliance with U.S. and international healthcare laws and regulations (“healthcare laws”) that govern our interactions with healthcare professionals (“HCPs”). We expect our vendors to understand and abide by the same rules. Our compliance with these laws and regulations ensures our commitment to patients, healthcare professionals, institutions and the governments where we do business. Violations of healthcare laws and regulations could subject our company and you, our vendor, to added scrutiny. Our overarching goal is to protect the healthcare system, the Company, and you - our business partners, by ensuring that we do not improperly influence an HCP’s purchasing, prescribing or treatment decisions.

- **Import/Export compliance:** Vendors must comply with all applicable trade laws in the U.S. and any other jurisdiction regarding import/export matters.
- **Security both physical and cyber:** Vendors must maintain adequate security at all facilities and implement supply chain security procedures to keep our supply chain secure. That includes reporting suspicious activity, counterfeit products, data security issues or any security issue. We're only as safe as the weakest link and you are critical to our collective safety.
- **Conflict Minerals:** Owens & Minor expects its vendors to undertake reasonable due diligence within their supply chains to determine the origin of the conflict minerals contained in materials and products they supply to Owens & Minor. Annually, when Owens & Minor requests additional information from some of our vendors, it is our expectation that all vendors will provide the necessary information.
- **Antitrust:** Vendors must conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
- **Industry Standards:** Should the legal requirements and practices of our industry change, we expect our vendors, at a minimum, to comply with the legal requirements of the jurisdiction in which they are operating - you can expect Owens & Minor to adapt to industry changes as they evolve as well.
- **Be Transparent:** Things happens in business and sometimes companies make mistakes. We want to know if you incur a misstep locally, nationally, or globally. Perhaps it's a breach or there is other legal trouble. As a partner, we expect you will let us know when something unfortunate occurs, so that we can build a plan to move beyond it. It's important for us to continue to partner with you and that means knowing when you've stumbled. Trust, is the bedrock of all relationships.

SOCIAL COMPLIANCE EXPECTATIONS FROM OUR VENDORS

- **Prohibit Discrimination and Harassment:** Owens & Minor expects all vendors to build a program prohibiting discrimination and harassment in all aspects of employment including but not limited to recruitment, hiring, placement, training, compensation, treatment, and advancement.
- **Provide a Safe and Healthy Workplace:** Owens & Minor expects all vendors to provide a secure, safe, and healthy workplace. We believe complying with all applicable occupational safety and health laws, rules, and regulations is critical to maintaining a productive workplace, mitigating the risk of accidents, and minimizing injuries and other health risks. We expect the same commitment to safety from those we partner with. All people regardless of affiliation deserve to be safe in their work environments.

- **Disaster Preparedness:** Vendors must be prepared for emergencies. This includes providing appropriate first aid supplies, employee notification and evacuation procedures, emergency training and drills, appropriate fire detection and suppression equipment and adequate exit facilities.
- **Proper Procurement Practices:** As a company dedicated to doing business ethically, Owens & Minor is committed to collaborating with like-minded, ethical organizations. We expect all vendors to share our values and maintain compliance programs that support ethical procurement practices globally. You are receiving this vendor Code of Conduct, to ensure we continue to work ethically and collaboratively together.
- **Protection Against Child Labor:** Owens & Minor does not engage in or tolerate child labor or the exploitation of children. We make every effort to ensure not only that Owens & Minor is abiding by all applicable workplace laws, but also that we are not doing business with anyone that recruits or exploits children.
- **Prohibit Forced Labor and Abuse of Labor:** Owens & Minor prohibits the physical or mental abuse of teammates and prohibits the use of all forms of forced labor, including forced prison labor, indentured labor, bonded labor, or slave labor. Owens & Minor is committed to doing its part to end these abuses and the human trafficking associated with them. We expect the same from our vendors.
- **We Protect the Environment:** Owens & Minor expects our vendors to comply with all applicable environmental laws, rules, and regulations. Vendors should strive to eliminate waste, improve processes to reduce carbon emissions, reduce their carbon footprint, recycle, and utilize renewable energy if possible. We believe that operating with the environment in mind is not just the right thing to do ecologically, it is also good business.
- **How to Contact Us:** To report a violation that causes concern or impacts our relationship, please contact your primary O&M contact or you can reach out to GM-CODEOFHONOR@owens-minor.com. Alternatively, you can access www.omicodeofhonor.com and either call our Ethics Hotline or use the online form to make a report – you may remain anonymous if you prefer. We need to know if there is a problem, so that we can take actions to fix it.