



Vendor Code of Conduct

Anti-Bribery & Anti-Corruption Policy Vendor Security Policy

For purposes of this document, the “Company” means, collectively, ADMI Corp., d/b/a TAG Company, and any entity under common ownership with ADMI Corp., (including, without limitation, Aspen Dental Management, Inc. (“ADMI”), ASP UC Support, LLC (“ASP”), ClearChoice Management Services, LLC (“ClearChoice”), Chapter Medical Aesthetic Clinic, LLC (“Chapter”), TAG Veterinary Support Services, LLC (“AZPetVet”)), and your employer, which may be Team Tag Services, LLC, ADMI, ASP, ClearChoice, AZPetVet, or an independently-owned professional corporation that has adopted this Conduct of Conduct, operating under the brand name Aspen Dental, WellNow Urgent Care, ClearChoice, Chapter Aesthetic Studio, or AZPetVet, and receiving non-clinical business support services from ADMI, ASP, Chapter, ClearChoice, or AZPetVet.

The Vendor Code of Conduct, Anti-Bribery and Anti-Corruption Policy and Vendor Security Policy applies to all of Company’s vendors, suppliers, contractors, subcontractors, business partners, consultants and their affiliates (“Vendor or Vendors”). Company expects that Vendors (and any of their subcontractors) that provide products and/or services to our company comply with the letter and spirit of all applicable laws, rules and regulations in the countries in which they operate, as well as the requirements set out in the attached Policies Compliance with the attached policies is subject to an audit at the discretion of Company. If a Vendor violates this Code and this Code and Policies, Company may impose adverse consequences, up to and including termination of a current agreement, and/or prevention of a future, business relationship.

Company strongly encourages our Vendors to promote the requirements of this Code and these Policies within their own supply chain.

Vendor Code of Conduct

Company is committed to ethical and lawful behavior, and to acting professionally and fairly in all business dealings and relationships. We seek to maintain high ethical standards and to comply with all applicable laws and regulations. Vendors' activities may influence Company's reputation and relationship of trust with our clients and employees, and as such we expect our Vendors to maintain the same high legal and ethical standards.

We expect integrity – of our employees, our directors and our vendors – in all we do. We have a code of conduct for our employees and directors that describe the policies, procedures, and principles that they must follow. Likewise, this Code incorporates the principles of lawful and ethical conduct that Company expects of its Vendors. Company expects its Vendors to have their own code of conduct that addresses business conduct and practices and to maintain a hotline or other mechanism for Vendor employees to report any allegations of misconduct on the part of the Vendor or Company.

Ethics & Integrity:

Conflict of Interests. Vendors must act with the benefit of of business in mind and not because of any personal interests that might interfere with the ability to make objective decisions. If an actual or potential conflict of interest is present, Vendors must contact their business partner at Company to disclose such actual or potential conflict.

Business and Financial Records. We expect Vendors to provide honest and accurate invoices. Invoices should be itemized, quote the PO number (where relevant), be supported by appropriate documentation and comply with all other requirements as set out in the relevant contract(s). Invoices may not be split to circumvent approval requirements.

Tax Evasion and the Facilitation of Tax Evasion. Company takes a zero-tolerance approach to our Vendors committing or facilitating tax evasion. Vendors (and each of their subcontractors) are expected to have policies and procedures in place to prevent employees and other associated persons from committing or facilitating tax evasion.

Antitrust/Fair Business Practice. Vendors must comply with antitrust laws – known globally as “competition laws.” Antitrust and fair competition laws are designed to promote free, open and fair competition. Company expects vendors to refrain from entering into any agreement that could improperly restrain trade, raise prices, or reduce quality, innovation, or consumer purchase options. Further, vendors must abide by fair business practices, including truthful and accurate advertising.

Gifts and Entertainment. All purchases made by Company will be made on the basis of price, quality and service, and Company will deal with its Vendors fairly, honestly and openly. Company employees are required to conduct all business and interactions with Vendors in strict compliance with the

applicable provisions of Company's Code of Conduct and Anti-Corruption Compliance Policy.

Vendors should avoid any actions with Company employees during any vendor selection or re-selection process that could give others the impression of favoritism or other improper advantage.

Furthermore, Vendors should not offer, and Company employees must not accept, gifts or entertainment that might compromise, or appear to compromise, an employee's judgment or independence.

Animal Welfare. Where applicable, Vendors agree to treat animals humanely, including with minimal stress and pain. Alternatives to animal testing should be used whenever possible.

Mechanism for Reporting Concerns. Vendors will maintain a system for their workers to report any concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. If concerns are reported, Vendors will investigate and take corrective action where needed.

Fair Working Conditions and Human Rights:

Company expects its Vendors to treat their workers with dignity and respect, and to uphold their human rights. Company values and promotes diversity and inclusion in all aspects of business, and expects our suppliers to identify, adopt, and integrate diversity into their own supply processes and hiring.

Fair Treatment and Anti-Discrimination. Vendors will provide a workplace free from harsh and inhumane treatment such as sexual harassment and/or corporal punishment, and free from illegal discrimination.

Wages, Benefits and Working Hours. Vendors will comply with local applicable laws and regulations regarding wages, hours, overtime hours, worker's compensation, and other mandated benefits. Vendors will communicate with workers about compensation, including any overtime pay, in a timely manner.

Freely Chosen Employment. No Vendor will use any form of slave or forced labor; this includes involuntary prison labor.

Child Labor. Vendors will comply with abide by all child labor laws and support the elimination of unlawful child labor and exploitation. No Vendor will use child labor. All employees shall be age 18 and over unless (1) a country's legal age for employment or age for completing compulsory education is under 18 and (2) the work is non-hazardous.

Human Rights Compliance. Vendors shall (and shall ensure that each of their subcontractors shall) comply with all applicable human rights laws, statutes, regulations and codes from time to time in force. Vendors shall implement due diligence procedures for their own suppliers, subcontractors and other participants in their supply chains, to ensure that there are no human rights violations, including but not limited to slavery, child labor or human trafficking in their supply chain. Vendors shall notify Company as soon as they become aware of any breach, or potential breach, of human rights in their business or supply chain.

Freedom of Association. Vendors must respect their workers' rights to associate together regarding working conditions, and to join unions, form work councils and engage in labor negotiations, including collective bargaining. Vendors shall not intimidate or harass any worker who participates in such associations.

Health, Safety and Respect for Environment: Company expects Vendors to provide a healthy and safe working environment, and to be environmentally responsible to minimize any adverse impacts of operations on the environment.

Protection of Workers. Vendors shall protect workers, and any visitors to their facilities, from exposure to chemical, biological and physical hazards. Vendors shall monitor their workplace for any other safety hazards and provide a safe and secure environment for workers and visitors. Information and training regarding any hazardous materials will be provided by Vendor.

Conservation. Vendors are encouraged to conserve natural resources and strive to protect the natural resources used in connection with your business, to reuse and recycle and to avoid use of hazardous materials where possible.

Environmental Compliance. Vendors must comply with applicable national and local environmental laws and regulations, including having, maintaining and operating in compliance with all permits, licenses, registrations and restrictions where required.

Waste Management. Vendors shall have systems to ensure the safe and lawful handling, movement, storage, recycling/reuse or management of waste, air emissions and wastewater discharges.

Processes, Emergency Preparedness and Response. Vendors shall have appropriate processes in place to identify, prevent and mitigate any risk of a chemical spill or other event that would pose a threat to worker safety and/or to the environment. These processes include emergency plans in the case of an unsafe event and response procedures should such an event occur.

Management Oversight. Vendors are expected to adopt management systems in furtherance of this Code, the attached Policies and their principles:

- Identify and comply with all applicable laws and regulations in the countries where they operate.
- Assess and manage risks in all areas address in this Code and the attached Policies.
- Maintain documentation to show confirmation with this Code, the attached Policies and relevant laws and regulations.
- Communicate the expectations of this Code and the attached Policies and provide effective training to workers.
- Ensure continual improvement in processes.
- Allocate appropriate resources to the ensure compliance with this Code and the attached Policies.

Protecting Information and Assets: Vendors are required to exercise care when handling Company's confidential and proprietary information, as well as inventions, such as creations, ideas, designs, copyrightable materials, trademarks and other technology and rights (and any related improvements or modifications) whether or not subject to patent or copyright protection. Similarly, during the course of business, Vendors are likely to have access to information about Company's business partners or their patients, and employees. Vendors must protect this information and use it appropriately for the purpose for which it was provided. Vendors must never share this information with anyone who is not authorized to receive it or does not have a business reason to know it. Depending on the business relationship, Company may entrust its assets to our

Vendors. Vendors must safeguard this property and use it only for the purposes for which it was provided.

International Trade Regulations: When working on Company business, our Vendors are required to comply with U.S. and local trade regulations, regardless of where in the world they are operating. Specifically, these regulations require that business may not be conducted on Company's behalf with any persons, entities, or countries subject to U.S. sanction or embargo or to an end user or entity who has been prohibited from participating in U.S. export transactions. No matter where located, all Vendors must comply with the U.S. Export Administration Regulations and any Office of Foreign Assets and Control regulations. In connection with Company business, our Vendors are also prohibited from participating in boycotts that are not sanctioned by the U.S. government.

The Importance of Letting Us Know: At Company, operating in a responsible and ethical manner is essential to our business. When a Vendor sees or suspects misconduct, or a Vendor wants to raise a concern, speak up and let us know. Vendors can report any suspected compliance or ethics violations related to services being provided to Company by contacting your contract manager or primary contact at Company, the Compliance Department at Company, or Company Compliance Line at Phone: 1-855-315-7455 or Online: letusknow.ethicspoint.com. Company takes all reports seriously and never tolerates retaliation against employees and Vendors for complaints submitted that are made in good faith.

Anti-Bribery & Anti-Corruption Policy

Company and its various subsidiaries and affiliates (collectively, the “Company”) strives to conduct itself according to the highest standards of ethical conduct. Throughout its operations, the Company seeks to avoid even the appearance of impropriety in the actions of its directors, officers, employees and agents.

Accordingly, this Anti-Bribery and Anti-Corruption Policy (the “Policy”) reiterates the Company’s commitment to integrity and explains the specific requirements and prohibitions applicable to its operations under anti-bribery and anti-corruption laws, including but not limited to the US Foreign Corrupt Practices Act of 1977 (the “FCPA”), whether or not applicable. This Policy contains information intended to reduce the risk of corruption and bribery from occurring in the Company’s activities. The Company strictly prohibits all forms of corruption and bribery and will take all necessary steps to ensure that corruption and bribery do not occur in its business activities.

2. Scope / Coverage of this Policy: The Company expects its vendors and business partners to comply with the prohibitions on bribery set out in this Policy.

3. Definition of Bribery: Bribery generally involves paying or offering to pay money or something of value to someone in business or in the public sector in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly. Bribery often involves payments (or promises of payments). However, it may also extend to the provision of favors that are of significant value to the recipient as well as inappropriate gifts or hospitality. Bribery can also take place where the offer or payment is made by or through a third party.

Bribes and kickbacks can therefore include, but are not limited to:

- gifts and excessive entertainment / hospitality/ travel and accommodation expenses;
- cash payments, whether by Employees or business partners such as agents or consultants;
- other ‘favors’ provided to public officials or customers, such as engaging a company owned by a member of a public official's or customer's family; and
- the uncompensated use of company services, facilities or property. Bribery is a criminal offence in most countries. Some countries, including the United States, have enacted anti-bribery laws which apply to the actions of individuals and companies even when they are outside the United States. Breach of these laws can lead to very severe penalties for companies and individuals.

4. Provisions: Prohibition of Improper Payments, Kickbacks and Other Forms of Bribery. The Company has a zero-tolerance policy towards bribery and corruption. This prohibition extends to all of the Company’s business and transactions in all jurisdictions where it operates. Employees, vendors and representatives of the Company are therefore strictly prohibited (whether acting in their own capacity or on the Company’s behalf) from:

- **offering, promising, giving or authorizing**, directly or indirectly, any bribe or kickback to or for the benefit of any person (whether in private or public office) to obtain any improper business or advantage for the Company, themselves, or their family, friends, associates or acquaintances;
- **offering, promising, giving or authorizing**, directly or indirectly, any bribe or kickback to or

for the benefit of any public official (or to any other person at the request of, or with the acquiescence of, a public official) with the intention of influencing that official in the performance of his / her public functions, whether or not that performance would be improper in order to obtain any business or advantage for the Company, themselves, or their family, friends, associates or acquaintances;

- **soliciting, accepting or receiving** (whether for the Company's benefit, their own benefit or that of their family, friends, associates or acquaintances) any bribe or kickback from any person (whether in private or public office) in return for providing any improper business or other advantage;
- **otherwise using illegal or improper means** (including bribes, favors, blackmail, financial payments, inducements, secret commissions or other rewards) to influence the actions of others; or
- **acting as an intermediary** for a third party in the solicitation, acceptance, payment or offer of a bribe or kickback.

Vendor Security Policy

Vendor shall implement and maintain reasonable security procedures and practices in accordance with the confidentiality, integrity, and availability that are appropriate to the nature of data disclosed to or accessible to Vendor and reasonably designed to help protect the data from unauthorized access, use, modification, disclosure or destruction, including without limitation: i) install and maintain a firewall configuration, ii) refrain from using vendor-supplied defaults for system passwords, iii) protect Company data, iv) encrypt transmission of Company data across open, public networks, v) use and regularly update antivirus software, vi) develop and maintain secure systems and applications, vii) restrict access to Company data by business need-to-know, viii) assign a unique ID to each person who has computer access, ix) restrict physical access to Company data, x) track and monitor all access to network resources and Company data, xi) regularly test systems and processes, and xii) maintain a policy that addresses information security. If Vendor has access to or receives Protected Health Information (“PHI”), as defined in the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), Vendor shall also comply with the security requirements set forth in the Business Associates Agreement executed by Vendor and Company.

Company may require Vendor to complete a Vendor Security Assessment (“VSA”). If so requested, Vendor shall complete the VSA within fourteen (14) days and return the completed VSA to Company. If Vendor fails to return the completed VSA to Company within fourteen (14) days, Company may terminate the contract on five (5) days’ notice. If Company determines in its sole discretion that Vendor’s security is deficient, Vendor shall have thirty (30) days to remedy its security deficiencies. If Vendor fails to remedy its deficiencies within thirty (30) days, Company may terminate the contract on five (5) days’ notice. Company may require Vendor to renew its VSA annually. Company may audit Vendor to determine its compliance with this Vendor Security Policy up to one (1) time per year on reasonable notice during business hours and at Company’s expense, provided that Company may conduct additional audits if it has reason to believe that Vendor is not complying with this Vendor Security Policy. If such additional audits reveal Vendor’s non-compliance with this Vendor Security Policy, Company will invoice Vendor for the cost of such additional audits.