



A CULTURE OF ETHICS AND INTEGRITY

Destination Pet, LLC (“Destination Pet” or the “Company” or “We” or “Our”, when possessive) prides itself in conducting its operations with the highest level of business ethics. This means We comply with all laws, but it goes beyond that. It means that We conduct business in a way that is fair, honest and respectful to all those We encounter in the course of our work. This includes clients, employees, contractors, vendors and even competitors. This Code of Ethics (sometimes referred to as the “Code”) describes key standards that help Destination Pet operate the kind of ethical business that employees are proud to work for and Our clients and vendors want to work with.

Our dedication to ethical business practices should show in everything We do. This means conducting Our operations with integrity beyond simply following the specific standards discussed below. As “You” (“Your”, when possessive) review this Code and conduct business each day, ask whether You would want your action described on the front page of Your local newspaper? If not, consider whether Your action is ethical and how it may reflect on You and the Company.

SCOPE

Business integrity is the highest core value at Destination Pet. As an extension of Our parent companies and the shareholders of LetterOne and L1 Health, and acting through our executives and all personnel, we share common values of honesty, transparency, and integrity. Destination Pet expects You, whether You are an employee engaged as a contractor, or are any person acting on our behalf in any capacity, to comply with this Code in connection with Your work for the Company. [We hold Our vendors up to many of the principles in this Code through Our VENDOR STANDARDS.]

WHAT WE EXPECT

Above All, Comply with Law and be an Example of Integrity

When We comply with laws and high ethical standards We:

- Build trust with those We work with, including Our clients, vendors and each other
- Hold ourselves and each other accountable for Our actions
- Mitigate risk personally and to the Company
- Build a brand known for honesty
- Create a company that people want to work for and that Our partners want to work with

You have a responsibility to comply with laws and Company policies and to uphold Destination Pet's high standards of integrity. We encourage You to raise any question You may have regarding this Code or any of the policies discussed in the Code with Your supervisor or by emailing the Legal Department at compliance@destpet.com. We have a policy of “**see something, say something**”, which means You should report violations of this Code that You witness or learn of (see the section titled **HOW TO REPORT A VIOLATION** below). The Company is committed to fully investigating any alleged wrongdoing. Our business ethics standards may be more demanding than what is legally

required. It is important to understand that You are encouraged, and in many cases required, to adhere to the higher standard. However, if any requirement of this Code or any other Company policy conflicts with the laws of a particular jurisdiction, You must comply with the law.

Treat Employees and Each Other Fairly, with Respect, Dignity and without Discrimination

Our employees being treated fairly and with respect is of the utmost importance. Destination Pet values diversity and inclusion and seeks to create a work environment where all employees can perform to their potential. Destination Pet will not tolerate any harassment or discrimination because of someone's race, color, religion, sex or gender, pregnancy, national origin, age, disability, marital status, sexual orientation, gender identity, military or veteran status, genetic information, domestic violence victim status, or any other category protected by federal, state and/or local laws.

You can find Our full *Equal Employment Opportunity Policy*, which includes Our harassment and sexual harassment policies, in the EMPLOYEE HANDBOOK.

Safeguard the Welfare of Minor Employees

Destination Pet recognizes that the primary focus of minors under the age of 18 is school. We also recognize that children should be protected from exploitation and should not be asked to perform any work that is likely to be dangerous. We will only employ minors when it is permitted under local, state and federal law and only in jobs that are suitable for minors. We will also comply with any applicable local, state and federal restrictions, such as the number of hours minors may work. Animals can be unpredictable. To further ensure employees are sufficiently mature to work in a pet-oriented business, Destination Pet will not employ anyone under the age of 16, even if permitted to do so by law.

Treat Competitors in a Fair and Legal Manner

Destination Pet operates in a highly competitive industry. Regardless of how Our competitors operate, we are committed to the highest standard of business integrity in the way we compete. As part of this commitment:

- You shall not offer bribes or kickbacks
- You shall not accept bribes or kickbacks
- You shall not steal or misuse confidential or proprietary information of a competitor
- You shall not defame or disparage any competitor, or its executives, employees or contractors

What is a bribe? If Person A offers something of value to Person B in exchange for Person B to act in favor of Person A, it is a bribe. A bribe does not always involve an exchange of money. It could be tickets to a World Series game in exchange for awarding a contract. It could also include offering something for someone NOT to take an action, such as paying a code enforcement officer to overlook a code violation.

What is a kickback? A kickback is similar to a bribe. The main difference is timing. A kickback happens when Person A receives something of value in exchange for awarding business to Person B. For example, Person B pays Person A 2% of the payments Person B receives from Person A's company. Typically kickbacks are not that obvious. For example, if Person B were to award a subcontract to a company owned by Person A's brother, that would be another form of kickback.

What if You are not sure? Questions about whether a situation is a bribe or kickback can be sent to the Legal Department at compliance@destpet.com.

Our more detailed policies and procedures relating to combatting corruption are included in Our Business Integrity Policy and Our Gifts, Entertainment & Hospitality Policy which are available in Paylocity.

Avoid and Disclose Conflicts of Interest

A conflict of interest means that Your role as an employee or contractor of Destination Pet conflicts with an interest You have from another aspect of Your life. Conflicts of interest can come up in many situations, but here are some examples:

- *Person A is a veterinary technician but also provides pet sitting services. This is likely a conflict because Person A and Destination Pet may be competing for boarding clients.*
- *Person B is a center manager and her father provides groundskeeping services for the center. This is likely a conflict because Person B might want to retain her father's services even if another vendor has lower rates.*
- *Person C is a groomer whose wife owns a veterinary practice nearby. This is likely a conflict because Person C might be asked for a referral to a veterinary practice and Destination Pet's practice competes with the practice owned by Person C's wife.*
- *Person D is a financial analyst writing a request for proposal ("RFP") for a new system. His best friend is a sales representative for one of three companies expected to bid on the project. This is likely a conflict because Person D could design the RFP to favor his friend's company.*

When an employee has a conflict of interest, the employee may not make the best decision for the Company. This can hurt the Company if it pays more for a service or product than it otherwise would. It can also damage the Company's reputation as a Company that is fair and honest to work with. For this reason, it is important to avoid a situation where it **looks like** there may be a conflict of interest. Keep in mind that even the appearance of a conflict of interest may still be damaging to You and the Company, despite no actual conflict being present. You are required to be on the lookout for conflicts of interest, or the appearance of a conflict. Promptly identifying and managing conflicts of interest helps maintain Your and Destination Pet's reputation.

You should avoid conflicts of interest. However, not all conflicts can be avoided. In most cases a conflict can be managed. For example, In the second bulleted example above, someone other than Person B could select the landscaping vendor while Person B selects all other vendors as she typically would as center manager.

You must promptly disclose potential conflicts of interest to the Legal Department by sending an email to compliance@destpet.com as soon as You become aware of a conflict of interest or potential conflict of interest. No activity or engagement that may or does create a conflict of interest, or the appearance of a conflict of interest, should be undertaken without first reporting and receiving approval for the activity or engagement in question. If You do not have access to email, please ask Your manager for assistance in contacting the Legal Department. The Legal Department will determine whether there is a conflict and whether any arrangements need to be made to address a conflict. In some cases, such as where an employee is competing with the Company, the employee will need to eliminate the conflict.

You can find Our full *Conflict of Interest Policy* in the EMPLOYEE HANDBOOK.

Be Professional in Your Communications

We all benefit from consistent messaging of Destination Pet's brand. You should not respond to any inquiries by the media regarding the Company. If You receive an inquiry it should be directed to the Chief of Staff, VP of Strategy. Similarly, if You receive an inquiry from a government or other regulatory body, You should refer the inquiry to the Company's Legal team at compliance@destpet.com.

Many of Our employees communicate through social media. When You do, You must not share any private information about the Company's clients, employees or business partners. Remember they have put their trust in You and Destination Pet. You also may not share any confidential business information of the Company such as identifying upcoming acquisitions or details regarding the Company's strategic plans.

Our more detailed policies and procedures relating to communications outside the Company are included in our *Communications Standards Policy*, which is available in Paylocity.

Ensure the Integrity of Business Records

Our business records are of critical importance. For example, Our patient records help ensure we are able to deliver quality care to Our veterinary patients by keeping track of a pet's medical history. Our financial records help us to manage the needs of the Company and help ensure employees and vendors are paid on time. Every business record is important and every business record must be accurate and complete. Under no circumstances may You include false information on a business record.

To help ensure Our business records are maintained for an appropriate amount of time (both in compliance with law and best practices), Destination Pet has adopted a Record Retention & Destruction Policy that states how long different types of records must be maintained.

The Record Retention & Destruction Policy is available in Paylocity.

Protect Company Assets

Destination Pet's assets enable us to perform Our work and serve Our clients. These assets include tangible things such as equipment, cash, office supplies, inventory and so on, but it also includes intangible assets like client contact lists, business records, logos and other intellectual property and business information. You should protect all of the Company's assets from theft, damage, waste, and misuse. Except when specifically authorized, Destination Pet assets must be used for business purposes only. When You leave Destination Pet, You must return all Destination Pet property in Your possession.

HOW TO REPORT A VIOLATION

If You become aware of any criminal activity or violation of this Code or a Company policy, then You must report it to the Legal team through the mailbox compliance@destpet.com. If You prefer to speak to someone directly to report your concern You may call any attorney on the Destination Pet Legal team. If You are not comfortable contacting the Legal team, then You may report your concern to a member of the Human Resources team or through Our third party reporting hotline, ThinkHR, at the following URL: <https://tellus.thinkhr.com/report/destinationpet>. If You make a report in good faith, then You will not face any retaliation or other disciplinary action, even if the report turns out to

be a false alarm. Reporting in good faith means you honestly believe a violation may have occurred. However, if You knowingly make a false accusation You will be subject to discipline.

Our more detailed policies and procedures relating to reporting violations are included in Our *Whistleblowing Policy*, which is available in Paylocity.

ADMINISTRATION OF THE CODE

The Board of Managers of L1 Pet S.à r.l. has overall responsibility for approving this Code and ensuring that it is effectively communicated to Destination Pet employees. The Board designated Destination Pet's Legal team as having primary responsibility for implementing the Code and recommending changes to improve effectiveness. The Legal team may designate additional Destination Pet employees and advisors to assist in executing these responsibilities.

ACKNOWLEDGMENT

Destination Pet employees and contractors should read this Code of Ethics and the other Destination Pet policies referenced in the Code carefully to understand the content and the consequences of non-compliance. If You have any questions, they can be directed to the Legal team or to Your manager. You are required to acknowledge that You have received the Code and the other Destination Pet policies as soon as possible after commencement of employment, reconfirm acknowledgement annually and when policies are updated, and participate in regular trainings on the policies. The form of acknowledgment is on the following page.

ACKNOWLEDGMENT

I hereby acknowledge that I have received and reviewed Destination Pet's Code of Ethics dated December 2021, and the policies referenced in the Code adopted by Destination Pet prior to the date of this acknowledgement (collectively, the "**Destination Pet Policies**").

I acknowledge that any questions I had have been answered. I certify that I fully understand the Destination Pet Policies and I agree to be bound by, and shall continue to comply, with the Destination Pet Policies.

I further certify that I have disclosed any personal conflicts of interest that may have arisen during my employment with Destination Pet, as required by Destination Pet's Conflict of Interest Policy.

I understand that failure to comply with the Destination Pet Policies may subject me to immediate adverse action, which may include suspension or termination for cause of employment.

Print Name: _____

Signed: _____

Date: _____