



CANTEL CODE OF CONDUCT

November 21, 2016

Dear Colleagues,

The Cantel Code of Conduct describes the fundamental principles concerning ethical business conduct for the Company. How Cantel achieves its business results is as important as the results themselves.

Our mission to deliver innovative infection prevention products and services that improve outcomes, enhance safety and help save lives is dependent on doing business in a responsible and ethical way. It is critical that we maintain the highest standards outlined in the Code of Conduct and make the right decisions every day.

The enclosed Code of Conduct outlines, in simple, clear language, Cantel's expectations as an employer and provides you with the principles and guidance that reflect our commitment to be a responsible global medical device company. Adhering to this Code is critical to earning and maintaining the trust and support of patients, healthcare providers, team members and shareholders.

Please read the Cantel Code of Conduct, sign the electronic acknowledgement and continue to implement the principles and guidance in all your daily business activities.

The Executive Leadership Team and I appreciate your continued commitment to our Code of Conduct. Together, we can better meet the needs of those who rely on us to deliver sustainable performance and strengthen our reputation.

Best regards,



Jørgen B. Hansen
President & Chief Executive Officer

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RECEIPT & ACKNOWLEDGEMENT OF THE CANTEL CODE OF CONDUCT

INTRODUCTION

Thank you for being part of the Cantel team! Our Company, Cantel, is comprised of Cantel Medical Corp. and its subsidiaries, each of which is vital to and an integral part of Cantel's success. Our Code, the *Cantel Code of Conduct*, represents our values and helps define how we do business. The Code applies to all Cantel Team Members, which includes all of Cantel's employees, contractors, consultants and board members, as well as our agents and vendors. Our Code applies locally as well as internationally, and serves as a guide for how we must conduct ourselves as professionals in our community and in every country in which we do business.

The Code contains our Company's policies on legal, ethical and business conduct matters. It includes both individual and corporate responsibilities. Team Members are responsible for adhering to the highest moral, legal and ethical standards of behavior, the same standards that our Company complies with in the course of business. It is this commitment to ethics that makes Cantel a desirable employer, vendor and customer.

As a global company, Cantel has divisions and employees all around the world, in different states and countries, subjecting our Company to the rules and regulations specific to those locations. All Team Members, as well as agents and vendors of the Company, must respect and comply with applicable laws, rules and regulations of the countries, states, counties, cities and any other jurisdictions in which Cantel conducts its business. All Company leaders, by virtue of their positions of authority, should act as ethical and professional role models by exemplifying our corporate values and exhibiting the highest standards of integrity. In the case that the Code is in violation of an applicable law, rule or regulation, that law, rule or regulation will supersede the Code and must be followed. Please bring any discrepancy between the Code and any law, rule or regulation to the immediate attention of the Cantel Legal Department or the Cantel Compliance Department. Additionally, Cantel will provide codes and policies that may apply to a specific division or Company location; in such a case, if there is a conflict between the Code and a specific division or location-specific code or policy, the division or location-specific code or policy will supersede the Code, unless otherwise noted.

The Code is not a complete list of legal or ethical questions and issues that you might face. It is intended to be used as a guide and is not all-inclusive. The Company has a variety of specific codes and policies that provide additional information and clarity on issues that may arise during the course of business. Please be sure to consult appropriate codes and policies as needed. If you have any questions about, or have concerns about any violations or potential violations of, any of the codes or policies outlined here, please contact your supervisor, the Human Resources Department, the Cantel Compliance Department, or the Cantel Legal Department for guidance. Cantel will not permit retaliation by, or on behalf of, the Company or any of our Team Members against good faith reports and complaints of violations of the Code, or any conduct that is otherwise illegal or unethical. Cantel's Chief Compliance Officer is responsible for the implementation of and adherence to the Code.

Finally, the Code will be reviewed periodically to ensure it is a current and usable resource for our business. All prior policies, practices or statements, oral or written, that (a) relate to any subject that is addressed by the Code, or (b) vary in any way from the policy or practice set forth in the Code relative to the subject, are hereby superseded. Any updates which might be necessary will be approved by management and communicated to all Team Members.

MISSION STATEMENT

OUR PURPOSE

Cantel is dedicated to delivering innovative infection prevention and control (IP&C) products and services for patients, caregivers, and other health care providers, which improve outcomes and help save lives.

OUR BUSINESS PRIORITIES

- **New Products:** Continually introduce new and innovative IP&C products and services.
- **Market Expansion:** Expand our products and services into key markets to provide global solutions that meet local needs.
- **Continuous Improvement:** Continuously improve our company in everything we do.
- **Strategic Acquisitions:** Effectively identify, acquire and integrate synergistic companies and technologies.
- **Financial Performance:** Achieve above-market financial performance benefiting our shareholders and employees.

OUR VALUES

- Treat all people with respect, while embracing diversity and cultural differences.
- Operate with integrity and ethics, and comply with all laws, rules and regulations in the worldwide markets we serve.
- Understand customers' needs and deliver high quality, innovative, safe solutions better than our competitors.
- Work in high performance teams, empowered to make a difference, and continue to learn and grow.
- Act with accountability and a sense of urgency to deliver on our goals.

BETTER ALIGN & STREAMLINE THE COMPETENCIES/BEHAVIORAL MEASURES TO OUR MISSION STATEMENT

- **Accountability:** True accountability is fully assuming responsibility for outcomes. We are all accountable to ourselves, our Team Members, our shareholders and our customers, for performing tasks ethically and achieving excellence. We must always meet our commitments to ourselves and our clients.
- **Communication:** The exchange of thoughts and information among a globally diverse group is the foundation for understanding. Whether one-on-one or in a team, true communication – talking and listening – creates a collaborative environment, keeping people informed and ideas fresh. Communication is also a key element in maintaining a strong link in the employee/client loyalty chain.
- **Teamwork:** Teamwork breeds empowerment and trust, two key factors that are not only important for a positive working environment, but also crucial for maintaining customer

loyalty. We promote teamwork by always working openly with no hidden agendas or motives, fostering respect. Being a strong team, nurtured and exemplified by our actions, will ensure that we have the skill and speed we need to compete.

- **Strategic Thinking & Initiative:** Strategic thinking and initiative are born out of ownership. We must avoid complacency and encourage passion, and actively search for innovative ways to accomplish our goals and to exceed the expectations of our clients. Doing so gives our Company a competitive edge and creates a more fulfilling, entrepreneurial work environment.

All employees must be aware of and understand the Company's objectives. All goals and initiatives, whether year-end sales targets, departmental, project milestones, or specific to a Team Member, must support the Company's objectives.

- **Urgency:** As empowered employees, we must maintain a sense of urgency in all that we do. Working with energy and passion, and consistently driving projects with passion, professionalism and respect leads to an atmosphere of achievement.

REPORTING VIOLATIONS

COMPLIANCE

Every Team Member has a responsibility to report violations, or suspected violations, of the Code in good faith. Team Members are encouraged to talk to supervisors or other appropriate personnel about observed illegal or unethical behavior and about the best course of action to pursue in a particular situation. Team Members who are concerned that violations of the Code, or illegal or unethical conduct by employees, officers or directors of the Company have occurred or are likely to occur, should contact their supervisor or the Human Resources Department.

If Team Members do not believe that it is appropriate to contact their supervisor or the Human Resources Department or they are more comfortable taking another course of action to address their concerns or complaints, the following resources are available:

- The Cantel Compliance Department, and the Chief Compliance Officer at 973-890-7220.
- The Head of Regulatory & Quality Assurance at 973-890-7220.
- The Cantel Legal Department at 973-890-7220.
- The Cantel Medical Corp. Board of Directors' Audit Committee or Nominating & Governance Committee, via the Cantel Anonymous Reporting Hotline.
- The Cantel Anonymous Reporting Hotline, which is maintained by an independent third party at www.cantelmedical.alertline.com, or by calling 800-826-6762 (English), 800-297-8592 (Spanish), or internationally by dialing a "Direct Access Code" based on your country and then dialing 800-714-4152 (detailed instructions on how to use the Cantel Anonymous Reporting Hotline are available at http://www.cantelmedical.com/investor/corp_govern.html). Anonymized reports are forwarded to Cantel's Chief Compliance Officer and General Counsel.

If Team Members' concerns or complaints require confidentiality, including maintaining anonymity, their confidentiality and anonymity will be protected to the extent practicable, subject to applicable laws, rules, regulations or legal proceedings.

The Company will promptly investigate any and all credible reports of violations of either the Code or any domestic or foreign laws, rules and regulations. Appropriate action will be taken, up to and including termination of employment, against anyone who is found to have violated this Code or applicable laws, rules and regulations. The Cantel Anonymous Reporting Hotline can also be used by Team Members, investors or others to speak anonymously, or in confidence, in connection with any perceived accounting or auditing irregularities or other misconduct or wrongful behavior.

NO RETALIATION

Cantel **will not** permit retaliation by, or on behalf of, the Company or any of its Team Members against good faith reports and complaints of violations of the Code, or any conduct that is otherwise illegal or unethical. Any Team Member engaging in impermissible retaliation will be subject to disciplinary action, up to and including termination of employment, at the discretion of the Company.

COMPLIANCE COMMITTEE

The Compliance Committee will meet as needed to review reported violations and to ensure that the Compliance Program is operating effectively. The Compliance Committee may

periodically review the Code and make updates to ensure that it remains a useful tool for employees. Any changes that are made will be communicated to Team Members.

MORAL STANDARDS

CONFLICT OF INTEREST

While we expect that employees have private lives outside of Cantel, each Cantel Team Member has an obligation to ensure that his or her activities do not conflict with, or appear to conflict with, the best interests of the Company. A conflict of interest exists whenever an individual's private interests interfere or conflict in any way (or even appear to interfere or conflict) with the interests of the Company. A conflict of interest can arise when a Team Member takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively.

Conflicts of interest may also arise when a Team Member or a member of his or her family, receives improper personal benefits as a result of the Team Member's position at Cantel, whether received from the Company or a third party. Team Members should conduct themselves with the highest legal and ethical standards at all times.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management. Team Members who become aware of a potential or actual conflict of interest should immediately bring it to the attention of a supervisor, senior officer or other appropriate employee and then, as appropriate, remove themselves from that situation unless they have received permission, in writing, by an officer of the Company. The terms of this Code do not seek to prohibit participation in certain protected concerted labor activities, regardless of potential conflicts with the Company's interests.

Examples of conflicts of interest may include, and are not limited to, the following:

- Using Company funds, property or other resources for illegal or improper purposes, or for any purpose which is not directly related to the Team Member's employment at Cantel.
- Improperly influencing, either directly or indirectly, the decisions of any customer, supplier, government official or candidate for public office, employee, or any other outside party in his or her dealings Cantel.
- Employment with, or providing services to, a competitor of Cantel while still employed at Cantel.
- Accepting from a vendor, supplier, or any other outside party that engages in business with Cantel, could engage in business with Cantel, or impacts Cantel's business, any gift or entertainment that either is not in compliance with Company codes and policies, or has an unreasonable value, either on its own or when combined with other gifts and entertainment.
- Situations that place personal activities in direct conflict with the interests of Cantel.
- Misuse of confidential information.
- Having a significant financial interest in a company which does business with or is in competition with Cantel.
- Accepting, giving or guaranteeing obligations of loans to Team Members, including loans to directors and officers that are not permitted by law.
- Acting in violation of the Code.

Team Members must remain completely objective when choosing vendors or doing business with customers or other outside parties. All decisions should be made without preference for anything other than the best interests of our Company.

Gifts & Entertainment

Giving or receiving gifts or entertainment in exchange for doing business with, or receiving preferential treatment from, our Company is prohibited. Gifts include not only material goods, but also services, promotional premiums, discounts on personal purchases of goods or services, nonbusiness entertainment, personal travel or hotel accommodation or any other beneficial arrangement.

Cantel is a closely regulated company, and, as a result, Team Members need to be aware of the laws, rules and regulations and Company policies that govern gifts and entertainment. These laws, rules and regulations as well as codes and policies impact giving or receiving gifts as well as providing or participating in entertainment.

U.S. Health Care Professionals

As a medical device company, Cantel is subject to a variety of laws, rules and regulations that specify our guidelines, limitations and obligations relating to gifts and entertainment. It is important to consult applicable codes and policies, such as the *Cantel Code of Ethics on Interactions with Health Care Professionals*, and Company-specific Physician Payment Sunshine Act and Key Opinion Leader Meal policies, among others. The requirements of applicable codes and policies, as well as laws, rules and regulations supersede this section.

A Health Care Professional, or HCP, is anyone involved in the provision of health care to patients. Physicians, doctors, nurses and other professionals who provide health care services directly to patients are HCPs. In addition, professionals whose employment can impact patient treatment, such as purchasing managers, hospital administrators and executives, and lab technicians, are considered to be HCPs. Generally, providing gifts, entertainment, sponsorships and meals to HCPs is limited, if not completely prohibited, by law or company codes and policies. When permitted, the amount that can be spent per person will be limited. Please contact the Cantel Compliance Department with any questions that you may have.

U.S. Government & State Governments

The U.S. government has a number of laws, rules and regulations regarding business gratuities, such as gifts, entertainment and meals, that may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense. In addition, contracting with employees of the U.S. government outside of their scope of employment with the U.S. government may be restricted. Please take care to review applicable laws, rules and regulations when interacting with the U.S. government and U.S. government personnel. Employees of specific U.S. state governments may also be subject to legal limitations and restrictions regarding gifts, entertainment, meals and outside employment, among other restrictions. Please contact the Cantel Legal Department or Cantel Compliance Department before providing any gift, entertainment, meal or other benefit to, or engaging in a contractual relationship with, a U.S. government or state government employee.

Foreign Government Officials

Internationally, the practice of gift giving and receiving varies widely from country to country. Prior to traveling abroad, Team Members should familiarize themselves with what is and is not appropriate for the areas that they will be visiting. In those countries where the exchange of gifts is customary and legal and it would be offensive or disturbing for a Team Member to decline a gift of a value greater than \$100, the gift may be received with prior written approval of an officer of the Company, the Cantel Legal Department or the Cantel Compliance Department. If obtaining prior written approval is not possible, Team Members must notify an officer of the

Company, the Cantel Legal Department or the Cantel Compliance Department of the receipt of such gift as soon as possible after receiving the gift. The Company may request gifts of that nature be turned over to the Company.

It is important to note that interactions with Foreign Government Officials are generally governed by the Foreign Corrupt Practices Act, which is a law that has been applied to activities that occur beyond the borders of the U.S. In addition, the definition of a “government official” is very broad. Team Members should review the Foreign Corrupt Practices Act section of the Code and *Cantel’s Foreign Corrupt Practices Act Policy* before providing any gifts or entertainment to anyone who may be considered a foreign government official. Contact the Cantel Legal Department or Cantel Compliance Department with any questions that you may have.

U.S. Business Relationships (Non-Health Care Professionals)

Customary business entertainment provided by or to a customer, supplier or other business colleague may be provided or accepted so long as no HCP is involved; meals may also be provided and accepted. Although business entertainment may occur in a variety of situations, the key determinant is that such entertainment is permissible under Company codes and policies as well as the law, it has a business related purpose, and it is reasonable in cost and regularity. Customary business entertainment requires that an appropriate Team Member be present at the event or meal along with the customer, supplier or business colleague. In addition, Team Members may not pay for the entertainment of customer, supplier or business colleague’s guests or family members, or anyone who does not have a genuine interest in the business being discussed.

Team Members may not accept personal gifts, favors or entertainment of an unreasonable value from anyone doing, or seeking to do, business with the Company without prior written approval of an officer of the Company, the Cantel Legal Department, Cantel Compliance Department, Cantel Finance Department or Cantel Audit Department.

Bribes, Kickbacks & Unlawful Payments

In the U.S. and most countries around the world, it is illegal to provide, accept, offer, or induce a bribe or kickback. Bribes and kickbacks are money, fees, commissions, gifts, gratuities, things of value or any compensation provided directly or indirectly, to influence a business decision.

Cantel’s policy is very simple and clear: the Company **does not** permit bribes, kickbacks or unlawful payments. To this end, Cantel products are sold solely on the basis of quality, service and price. Team members may not offer, make, or authorize or receive payment of money or anything of value, directly or indirectly, with improper intent to:

- Illegally influence the judgment or conduct, or create a desired outcome or action, by any individual customer, company or company representative.
- Illegally gain an improper business advantage involving items reimbursed by a government health care program.
- Illegally induce any health care provider to purchase or order Cantel products or services.

Any Team Member found to be offering, requesting, accepting or making a bribe, kickback or unlawful payment is subject to immediate disciplinary action, up to and including termination of employment.

No third party, including agents, consultants, friends or family members, may be used to circumvent the policy against bribes, kickbacks and unlawful payments. All Team Members have an obligation to report to the Company any actual or attempted bribe or kickback made by or given to any Team Member.

Marketing

In marketing our products and services to health care professionals or anyone else, Team Members must observe not only the requirements of this Code, and other Company codes and policies, Team Members must abide by all applicable laws, rules and regulations related to marketing medical devices and services. In marketing our products and services, the Company will not tolerate any kind of improper inducements or other illegal marketing practices. If you have any questions whether a particular marketing practice is permissible, you should contact the Cantel Compliance Department, Cantel Legal Department or Cantel Regulatory Department.

Discounts & Rebates

In negotiating pricing with health care customers, discounts, rebates and other preferential pricing strategies will be offered in compliance with applicable laws, rules and regulations. For example, in the U.S., the Company will comply with the Anti-Kickback Statute and all applicable safe harbors to the Anti-Kickback Statute.

False Claims Act

The Federal False Claims Act is a civil law that prohibits submission, or causing the submission, of fraudulent claims to Medicare or Medicaid, and other federal and state programs. False claims that are submitted to a federal health care program, intentionally or with reckless disregard or deliberate indifference, can subject Cantel as well as Team Members to significant penalties. Team Members must ensure that all statements, submissions and other communications, whether oral or written, with our customers, prospective customers, suppliers and other persons and entities are truthful, accurate, and complete.

Team Members, or any third-parties contracted by Cantel, may not provide misleading advice, guidance or encouragement to customers on how to code for or bill third-party payors for our products or services, or how to report costs on any institutional cost report. Such advice will be given only after it has been confirmed that the advice is fully consistent with all applicable coding and billing rules and regulations. Advice may not be provided as an inducement to use Cantel products or services. If there is any question as to the accuracy of the advice to be given, then such advice may not be given. In addition, the Cantel Regulatory Department, Cantel Compliance Department or Cantel Legal Department should be contacted with any questions regarding the provision of billing or coding advice, and any activities related thereto should be vetted by one of these departments prior to implementation.

Foreign Corrupt Practices Act

Many countries, including the U.S., have strict laws prohibiting payments to foreign officials for the purpose of obtaining or retaining business. Specifically, the Foreign Corrupt Practices Act, known as the FCPA, does not permit U.S. companies, either directly or indirectly, to pay or promise to pay money or provide anything of value to a foreign official in an attempt to influence decisions, gain new business or retain current business. The definition of “foreign official” is very broad. It includes employees of state-owned entities, such as doctors or administrators who work in state-owned hospitals.

U.S. law provides an exception for certain small payments, sometimes referred to “facilitation payments” or “grease payments,” made to secure “routine governmental action,” such as fees

for permits or other official documents, processing government paperwork, loading and unloading cargo, for example. If such a payment is permitted, the FCPA books and records provision requires Cantel to record payments in a transparent manner and maintain internal controls. It is the responsibility of Team Members who are involved in such payments to ensure that appropriate action is taken to comply with the law. Unless doing so is impossible, Team Members must receive prior written approval from the Cantel Legal Department or Cantel Compliance Department prior to the disbursement of any payment.

It is important to note that U.K. law prohibits some of the aforementioned payments, and Team Members should be sure that this prohibition does not apply prior to making a facilitation payment.

Anti-Money Laundering

It is illegal to engage in money laundering. Money laundering includes engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds in order to make the unlawful proceeds appear to have legitimate origins or constitute legitimate assets.

The purpose of the anti-money laundering laws, rules and regulations are to help detect and report suspicious activity, including the predicate offenses to money laundering and terrorist financing, such as securities fraud and market manipulation.

If a Team Member is uncertain of the situation or observes a violation, it should be reported immediately to his or her supervisor, the Cantel Legal Department, or the Cantel Compliance Department.

Company Assets

Every Team Member has the obligation to use the Company's time and property in a wise manner. The use of the Company's time and property for purposes not directly related to the Company's business is prohibited. All Team Members should protect the Company's assets and property and ensure their efficient use.

The Company's assets and property include, but are not limited to, equipment (e.g., computers, phones, etc.), materials, facilities, office supplies and vehicles.

Team Members are expected to use and maintain equipment appropriately and safely. Please refer to applicable Company codes and policies for specific details on asset management rules and requirements.

In the event of termination of employment, all Company assets and property in the possession or control of the Team Member (including, but not limited to, documents, copies, notes, computers, keys, manuals, etc.) must be returned immediately.

Competing Outside Employment & Business Interests

Team Members may hold jobs outside Cantel, but have a responsibility to ensure that they do not own, have a material financial interest in, work for, consult with, serve as an officer or director for, or otherwise assist a customer, supplier, contractor, regulator, or competitor that competes with or conflicts with any business of the Company without prior written approval of an officer of the Company.

Any Team Member who has outside employment must inform his or her supervisor or an officer of the Company, in writing, of such work. If Cantel determines that a Team Member's outside

employment is interfering with the ability to meet Company requirements, the Team Member may be asked to terminate outside employment in order to remain employed at Cantel.

Any Team Member involved in negotiating an agreement or transaction with a company in which the Team Member owns stock, or has any other financial interest or business relationship, should inform his or her supervisor, an officer of the Company or Cantel's Board of Directors, as appropriate, so that a determination can be made as to how best to proceed. Team Members that own stock in public companies are not required to inform the company of their ownership, so long as the Team Member's combined direct and indirect ownership interest is less than 5% of the total outstanding shares of that company.

The Company's *Securities Trading Policy* addresses Cantel's policies regarding permitted and prohibited securities trading practices for our Team Members. Team Members should consult the *Securities Trading Policy* prior to trading securities, such as stock, especially if the securities are those of a customer or supplier of the Company or a company that Cantel is otherwise associated with. Team Members are strictly prohibited from purchasing or selling securities of a public company if the employee either (i) is in possession of material, non-public information regarding that company, or (ii) has knowledge that the Company intends to acquire or engage in a material business transaction with that company.

If a family member or someone close to a Team Member is an employee of or otherwise associated with a competitor of the Company, the Team Member should notify an officer of the Company, the Cantel Legal Department or the Cantel Compliance Department so that the nature and extent of any concern may be assessed and appropriately resolved.

Nepotism & Relationships

Cantel recognizes that there will be situations in which relatives or persons in a close personal relationship may be employed in the same operating unit. For the purpose of the Code, "relatives" includes spouses, partners, grandparents, parents, children, siblings, in-laws, aunts, uncles, nieces, nephews and cousins.

Employment of relatives, or those in a close personal relationship is permitted, so long as that person is qualified for the position. However, this policy is subject to certain restrictions. Relatives, or those in a close personal relationship, are not permitted to be in a (i) direct reporting relationship, or (ii) position where there is the possibility that one relative or close personal relation may be involved in evaluating, inspecting, cross-checking, processing, auditing, influencing other's work, impacting compensation, benefits or career opportunities of his or her relative or close personal relation. Cantel, in its discretion, may take additional steps to reduce the likelihood of workplace conflicts or perceived inequity.

Relationships between Team Members, romantic, familial or personal, must not interfere with those Team Members' ability to meet job requirements and must not influence employment-related decisions. If such a conflict arises, the situation must be addressed immediately. Team Members must remove themselves from situations where a relationship may compromise good business judgment.

The Human Resources Department must be notified of any existing or potential conflict. Any questions about, or proposed exceptions to, the application of these policies should be directed to the Head of Human Resources at 973-890-7220.

Corporate Opportunity

Team Members owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises and, as such, are prohibited from:

- Taking for themselves, personally, opportunities that properly belong to the Company (such as the acquisition of a company or a product line in the same industry as the Company) that are discovered through the use of corporate property, information or their position at Cantel.
- Using the Company's property, information or position for personal gain.
- Competing with the Company.

Loans

Loans to Team Members from financial institutions that do business with the Company are permissible as long as the loans are made on prevailing terms and conditions and are in amounts meeting the institutions' usual and ordinary lending guidelines.

Long term or non-de minimis loans to Team Members, as well as any loans to Cantel executives from the Company are prohibited. Team Members and their families may not borrow or otherwise receive funds from present or potential suppliers, customers or partners of the Company with the exception of financial institutions under the circumstances provided above.

Travel Benefits

Unless otherwise specified, Team Members traveling on Company business may keep airline mileage credits, hotel rewards, car rental perks or restaurant benefits for their personal use. Such benefits should be the type offered to the general traveler, and the cost of using the services or products of the companies providing these benefits must not increase as a result of the benefit.

For more information, please see our *Corporate Travel Policy*.

CONFIDENTIALITY

Confidential Company Information

During their time at Cantel, Team Members will come into contact with a wide variety of confidential information, including Confidential Company Information.

Confidential Company Information includes all non-public information that might be of use to competitors of the Company, or harmful to the Company or its suppliers, customers or other such third parties if disclosed, as well as information deemed confidential under the law.

Confidential Company Information may include, among other things, sales, earnings and other financial information, financial statements, business plans, sales programs, inventions, product and pricing information, manufacturing processes, chemical composition of materials, research and development data, acquisition targets, internal memos and electronic files, customer lists, or even information obtained from a third party pertaining to new products or ideas.

Confidential Company Information is to be protected at all times. In fact, all Team Members must sign a non-disclosure agreement or employment Agreement upon hire, stating that the

Company's confidential business and technical information and the Company's trade secrets will not be disclosed before, during or after termination of employment.

Employees must be cautious not to inadvertently disclose non-public Company information when speaking in a public setting, such as presenting papers at conferences or in discussions with prospective customers during a trade show.

On occasion, Confidential Company Information may be released to vendors, contractors or visitors to Cantel. In those cases, a confidentiality agreement on non-disclosure agreement must be signed by the outside party or access to information and facilities must be limited.

Please refer to the section entitled "Pursuit of Excellence" for more details on intellectual property and Company property.

Media

To ensure that any information provided to the public on behalf of Cantel is accurate, only the General Counsel of Cantel, designated officers of Cantel, or such employees specifically designated to communicate with the media on behalf of Cantel may make comments on behalf of the Company to a member of the media. Unless permission to speak to the media on behalf of the Company has been granted by an officer of the Company in writing, any Team Member who is approached or contacted by a member of the media should refer that request to the General Counsel of Cantel, designated officers of Cantel, or such employees specifically designated to communicate with the media on behalf of Cantel. This process will ensure that only current, consistent, accurate and non-confidential information is provided to the public.

The Company also trusts and expects Team Members to exercise personal responsibility whenever they participate in social media or other online activities. The Company's *Social Media Policy* contains additional guidelines regarding social media disclosures.

Note that the terms of the Code do not seek to restrict employees from discussing lawful compensation, hours and working conditions, or other legally protected terms and conditions of employment, and any such discussions are permitted under the law and the Code.

Nothing in this Code prohibits Team Members from reporting possible violations of a U.S. federal law, rule or regulation to any governmental agency or entity including, but not limited to, the Department of Justice, the Securities and Exchange Commission (known as the SEC), Congress, or any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of any federal law, rule or regulation. Prior authorization is not required to make any such reports or disclosures and Team Members are not required to notify the Company that they have made such reports or disclosures. We do request that, as appropriate, Team Members raise issues and concerns with the Company as they arise, so that we can efficiently and effectively address those concerns.

Insider Trading

As a publicly held company, Cantel files periodic reports with the SEC. Cantel is also obligated to publicly disclose certain material events regarding the Company.

Prior to certain announcements, members of the management team and others may have material nonpublic information that is inside knowledge of product developments, financial circumstances, acquisitions or litigation that may affect stock prices or Cantel's financial performance.

The definition of “material nonpublic information” is broad. Team Members should consider information to be material if a reasonable investor would consider it important in making an investment decision. Information is considered to be nonpublic if the information is not generally available to the investing public.

Material information may include information about Cantel as well as information pertaining to other companies.

Team Members who have access to or knowledge of confidential or material nonpublic information from or about the Company are not permitted to buy, sell or otherwise trade in Cantel securities, or another company’s securities that is or could be affected by the material nonpublic information, whether or not they are using or relying upon that information. In addition, it is illegal to pass the material nonpublic information as a “tip” to others who may make buying, selling or any other trading decisions based on that material nonpublic information.

Anyone passing on material nonpublic information, or inside information, without personally benefiting from such information may also be subject to severe penalties.

In addition, Cantel has implemented trading restrictions to reduce the risk or appearance of insider trading. Team Members are directed to the Company's *Securities Trading Policy* (and, with respect to officers and directors, the Company's *Section 16(a) Compliance Policy*) or to the Cantel Legal Department or Cantel Compliance Department at 973-890-7220 if they have questions regarding the applicability of such insider trading prohibitions.

Any requests for financial information or inquiries from investors should be directed to the Company's Chief Financial Officer, President or Chief Executive Officer. This ensures compliance with SEC regulations and reduces the possibility that information will be improperly disclosed.

Team Members must not engage in speculative trading of Company securities. This generally prohibits short sales and trading in puts, calls and other options or derivatives with respect to such securities, unless such transactions are for legitimate, non-speculative purposes. Our officers and directors may not engage in any such transactions for any purpose. If you have questions regarding the potential speculative nature of your transaction, please contact the Cantel Legal Department or Cantel Compliance Department. This provision does not apply to the exercise of employee stock options.

QUALITY POLICY

Cantel expects a commitment to only the highest quality in all facets of our business.

Cantel will:

- Achieve customer commitment by maintaining excellence in products and services through constant re-evaluation and refinement.
- Actively assess, select, develop and reward people in a way that ensures an organization of the highest quality and integrity.
- Develop an atmosphere where each Team Member is responsible for the quality of what he or she supplies.
- Develop quality systems that are dedicated to documenting and controlling processes to assure predictable conformance to requirements.

- Ensure that Cantel's quality systems are in compliance with domestic and international quality system standards.

VENDOR SELECTION

Cantel is committed to working with vendors and suppliers who can fulfill the business needs of the Company, conduct their business in a lawful manner and are committed to the same high standards of integrity and ethics as Cantel.

Cantel expects vendors and suppliers to abide by the standards outlined in the Company's *Vendor Code of Conduct*, the *Conflict Minerals Policy*, and the *Policy Statement Related to Slavery and Human Trafficking*, among other Company policies and codes, as well as all applicable laws, rules and regulations. Cantel may re-evaluate and terminate its relationship with any supplier or vendor that fails to comply with applicable laws, rules and regulations or Cantel's codes and policies.

MEDICAL DEVICE & MANUFACTURING GUIDELINES

As a manufacturer of medical devices, IP&C products and associated products, Cantel is subject to many laws, rules and regulations to ensure that our products are safe, effective and of the highest quality. Every Team Member is expected to abide by the applicable medical device laws of the country, state and locale in which the Company is conducting business, as well as our own policies, codes and procedures.

Safe Medical Devices Act of 1990 & FDA Quality System Regulation

The Safe Medical Devices Act of 1990, as amended, mandates that manufacturers of implantable, life-sustaining or life-supporting devices and other devices regulated by the U.S. Food and Drug Administration, known as the FDA, have procedures in place to track those devices. Distributors must report to manufacturers and the FDA any incidents involving malfunctions or any events indicating that a medical device may have caused or contributed to serious illness.

The FDA's 21 CFR Part 820 Quality System Regulation provides guidelines to ensure quality in the design and manufacture of medical devices, ensuring their safety and effectiveness for their intended uses. The FDA also provides guidelines for handling complaints, investigations into device problems and corrective and preventive action to address them.

In compliance with these regulations, Cantel has established tracking procedures for all of our products and implemented systems for resolving customer complaints. Throughout the year, we undergo internal audits as well as strict quality controls designed to ensure that our procedures and processes are in compliance.

Additionally, we are inspected by the FDA as well as other outside regulatory agencies and private bodies for compliance with laws, rules and regulations and ISO certification requirements.

Fair Competition

Each Team Member should endeavor to deal fairly with the Company's customers, suppliers and competitors.

No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice. Stealing or improperly obtaining proprietary information, possessing or using trade secret

information that was obtained without the owner's consent, or inducing such activities by past or present employees of other companies is prohibited.

Cantel's activities are subject to antitrust, anti-kickback, fraud and abuse, and trade regulation statutes that govern how we interact with customers, suppliers and competitors. It is important for Team Members to know and understand these laws, rules and regulations and to make sure they are in full compliance with them. Some of the most serious offenses that fall under antitrust laws may include the following:

- Agreements or discussions with competitors to restrict competition, fix prices, limit production or allocate customers or territories.
- Agreements with customers allowing them to purchase product below cost.
- Agreements with customers forcing the customer to purchase a product they do not want as a condition for purchasing another product that they truly want.
- Any agreement that illegally discriminates in favor of, or against, any customer.

Any such agreement, whether formal or informal, may be unlawful and is prohibited by the Company. In addition, please note that the list above does not include every situation or conflict of interest that may rise during the course of business. Therefore, Team Members must avoid unnecessarily involving themselves in situations from which unlawful agreements may be inferred, and contact with competitors should be kept to a minimum. Contact the Cantel Legal Department or the Cantel Compliance Department with any questions that you may have about this section.

Cantel strictly adheres to all U.S. Export Control Laws and Sanctions Regulations aiming to prohibit unauthorized export of restricted technology and information to specified countries, individuals or entities. Cantel also complies with U.S. Anti-boycott Laws under the Export Administration Regulations (EAR), which prohibit the Company from furthering or supporting international boycotts not sanctioned by the U.S. government.

Cantel complies with special legal requirements when conducting business with governments or government-owned entities. Team Members should adhere to the highest ethical standards when engaging in such business transactions.

In accordance with applicable laws, rules and regulations, Cantel engages in only accurate, truthful advertising and marketing in order to educate the public, increase awareness of the Company's services and help recruit new Team Members.

Failure to comply with any of the above could subject both the Company and individual Team Members involved to criminal penalties. In addition, the Company may be subject to civil penalties and treble damages. Team Members must direct questions or concerns regarding these laws and how they are applied to senior management, the Cantel Legal Department, or the Cantel Compliance Department.

RESPECT FOR OUR CUSTOMERS & OUR COMMUNITY

ENVIRONMENT

Cantel is committed to ensuring that all of our operations respect the environment and the health of our employees and neighbors in the community. We comply with all legal requirements regarding waste disposal and emissions. Questions concerning environmental issues may be directed to the Cantel Legal Department or the Head of Regulatory & Quality Assurance.

POLITICAL CONTRIBUTIONS

Team Members may be politically active, but may not make a contribution to any political party, committee or candidate on behalf of the Company without prior written approval by an officer of the Company. Contributions or gifts to any political party or candidate intended to illegally or improperly influence any official's decisions with regard to Cantel are strictly prohibited.

PROFESSIONAL ORGANIZATIONS

Cantel belongs to a number of professional organizations within the manufacturing and medical device industries. These local organizations provide resources, training and information that help drive and support our initiatives.

Team Members are encouraged to participate in professional organizations that pertain to their jobs. Professional organizations provide an excellent opportunity to further professional education, generate business contacts and expand business opportunities.

Team Members must always maintain the highest ethical and business standards when interacting with any professional organization.

CORPORATE IMAGE

Cantel seeks to create and maintain a positive reputation in the communities in which we operate, locally and globally, and strives to conduct business in such a manner that promotes goodwill. Team Members are expected to act in a way that reflects positively on the Company, whether Team Members are interacting with others Team Members or with members of the business community outside of the Company.

PURSUIT OF EXCELLENCE

INTELLECTUAL PROPERTY

Intellectual property includes patents, trade secrets, trademarks and copyrights to materials that are owned by Cantel or authored by Team Members while employed at the Company. Cantel's intellectual property uniquely identifies the Company and our products and encompasses the property rights of the Company in proprietary creations such as ideas and the expression of ideas and, therefore, need to be protected.

Team Members should be mindful that ideas or inventions developed during a Team Member's normal course of work for the Company, or while using Company facilities, equipment and information, entitles the Company to the rights to that particular invention, and becomes Company property. All ideas and inventions developed while a Team Member is employed by or engaged with Cantel must be disclosed immediately to the Company and prior to any public disclosure, in order to preserve full legal protection for the intellectual property. Team Members should refer to their employment agreements, and any other agreement that they may have with Cantel for further details regarding any additional, specific obligations pertaining to intellectual property that may apply to them.

Team Members are reminded to be diligent in their use and creation of the Company's intellectual property. This includes following internal guidelines that govern maintaining the confidentiality of Cantel's intellectual property. These guidelines cover issues such as non-disclosure of inventions, appropriate use of Company logos, trademarks and brand names, along with other intellectual property guidelines.

Company logos, trademarks and brand names should be used exactly as they are registered, on all documentation and materials. The same guidelines are applicable to Team Members' use of third-party trademarks or brand names, which should be properly acknowledged. Misusing, misappropriating or wrongfully disclosing intellectual property carries significant legal and financial risk, and is strictly prohibited. Any known misuse or unprotected use or disclosure of intellectual property must be reported immediately to a senior manager, the Cantel Legal Department or the Cantel Compliance Department.

SCIENTIFIC INTEGRITY

Cantel's mission is to offer products that sustain quality of life for our end customers. Only after rigorous testing and meticulous research and validation are the Company's products released for sale to our customers. Every process, from development through manufacture, is performed with the utmost care and all data recorded as a result of testing and development must be true, accurate and not misleading.

TEAM MEMBER FULFILLMENT

COMPANY POLICIES & PRACTICES

Cantel has established policies and practices to ensure that our workplace is a safe and healthy environment. How we interact with internal Team Members is a reflection of how we handle our external business affairs with customers and vendors. We expect Team Members to treat each other and all outside parties with the utmost respect and courtesy.

Safety

The health and safety of each employee is extremely important and to that end, we have established safety procedures to ensure a safe work environment. The Company provides safety training to appropriate Team Members and holds them accountable to work in a safe manner, follow established procedures and actively participate in training programs.

Any unsafe conditions or concerns should be reported immediately to the Team Member's supervisor and/or the Head of Regulatory & Quality Assurance.

To provide for the safety and security of Cantel's Team Members and facilities, only authorized visitors are allowed in the workplace. If an unauthorized individual is observed on Cantel's premises, Team Members should immediately notify their supervisor, or if necessary, accompany the individual to the reception area. Team Members should refer to the applicable Company *Visitors in the Workplace Policy* for further details.

It is also essential that each employee protect personal belongings brought into the building or work location. Employees should take proper measures to safeguard their belongings when stepping away from their work location. Cantel is not responsible for the loss of personal money or belongings.

Harassment & Workplace Conduct

Cantel is committed to a work environment in which all individuals are treated with respect and dignity. We expect that all relationships among persons in the workplace will be business-like and strictly free of harassment that may be based on a Team Member's race, color, religion, creed, sex, national origin, pregnancy, ancestry, age, disability, genetic information, sexual orientation, gender identity/expression, marital status, military or veteran status, status with regard to public assistance, or any other protected class defined under local, state or federal law.

Team Members who believe that they have been the target of, or witness to harassment, discrimination, illegal retaliation, or other offensive behavior should report the incident to their supervisor, the Human Resources Department, the Cantel Legal Department, or the Cantel Compliance Department without fear of retaliation. In addition, we offer a confidential Anonymous Reporting Hotline at 800-826-6762 and a website at www.cantelmedical.alertline.com.

No retaliation will occur because a Team Member has, in good faith, reported an incident of suspected harassment or offensive behavior, even if such complaint is erroneous. Incidents will be promptly investigated and appropriate action will be taken. However, knowingly making false or malicious complaints and other types of inappropriate reports, may be the subject of appropriate disciplinary action. A copy of the Company's *Harassment-Free Workplace Policy* may be obtained from the Human Resources Department.

Violence-Free Workplace

Cantel is committed to providing a comfortable work environment in which all individuals are free from violence or threats of violence. In accordance with local laws and our own internal policies, we do not tolerate any acts of violence in the workplace. Violence is defined as any act or threat of physical violence, harassment, intimidation, coercion, brandishing weapons, or threatening or talking of engaging in these activities. Team Members are prohibited from carrying, possessing or using firearms, or other weapons, while on Company premises or while conducting Company business.

A copy of the Company's *Violence-Free Workplace Policy* is available online and may also be obtained from the Human Resources Department.

Drug-Free Workplace

Cantel believes that it is important to maintain safe, healthy and efficient operations, and to protect the safety and security of our Team Members, property and equipment. Being under the influence of drugs or alcohol on the job may pose serious safety and health risks to the user and all those who work with, or come in contact with, the user.

Team Members are prohibited from being under the influence of, using, selling, purchasing, transferring or possessing unauthorized or illegal drugs, or controlled substances. Additionally, Team Members are prohibited from abusing or misusing legal drugs while on Company premises, performing Company business or while operating Company equipment, machinery or vehicles. Alcohol may be served on Company premises at Company-sponsored events that are approved by the Human Resources Department or an officer of the Company. Otherwise, use of alcohol or being under the influence of alcohol on Company premises, or while operating Company owned assets, is prohibited.

Job applicants are required to undergo a drug test as a condition of employment at Cantel and Team Members are subject to drug and alcohol testing, in accordance with our *Substance Abuse and Testing Policy*. However, applicants for temporary, summer positions or other short-term, temporary positions offered to students (provided the applicant is being hired pursuant to the Company's understanding that the position will cease to exist within five months or less and the applicant will, at that time, be separating his or her employment to return to school), and temporaries employed by an employment agency and assigned by the agency to work at the Company, on a case-by-case basis, may not be subject to pre-employment drug and alcohol testing.

Each Team Member will receive a copy of the *Substance Abuse and Testing Policy* upon commencement of employment. The policy is also available online may also be obtained from Human Resources Department.

In compliance with local regulations, there is to be **no smoking** in any part of our building by Team Members, clients or visitors. Team Members may leave the facility to smoke during breaks in a designated area outside the building.

Equal Opportunity, Diversity & Non-Discrimination

Cantel recognizes and respects the differences and unique talents that each employee brings to the Company. We are committed to using those differences in order to succeed in the marketplace. A diverse team enables us to better serve customers across the globe and creates a work environment where Team Members feel included and motivated.

The Company is committed to ensuring fair and equitable treatment in all of its business dealings. This policy applies to all employment activities such as recruiting, hiring, training, promotions, performance appraisals, disciplinary actions, compensation and any other term or condition of employment, as well as to business activities with customers, vendors, and other outside parties.

Cantel continues to be committed to equal employment opportunities, and complies with applicable laws including equal employment opportunity employment and affirmative action employment laws. Cantel does not discriminate in employment opportunities or practices on the basis of race, color, religion, creed, sex, national origin, pregnancy, ancestry, age, disability, genetic information, sexual orientation, gender identity/expression, marital status, military or veteran status, status with regard to public assistance, or any other protected class defined under local, state or federal law.

Cantel abides by the requirements of the Americans with Disabilities Act and state laws governing employment of individuals with disabilities. Cantel will make reasonable accommodations for qualified individuals with known disabilities, unless doing so is an undue hardship on the Company. This policy applies to all aspects of employment including job selection, job assignment, compensation, discipline, termination of employment, access to benefits and training.

Cantel is committed to assuring that:

- Applicants are considered for employment based upon their qualifications to meet the requirements of the job and to assist in fulfilling the mission and objectives of Cantel.
- Employees are not subject to discrimination in any aspect of employment and employee relations matters, including, but not limited to, promotions, demotions, transfers, work force reductions, terminations, salary increases, rate of pay, training and all conditions or privileges of employment.
- This policy is communicated to all employees and applicants for employment.
- Contracted third parties correctly file and abide by these laws, rules and regulations as equal opportunity employers.
- Persons who violate this commitment are subject to disciplinary action up to and including termination of employment at the discretion of Cantel.

PRIVACY

Cantel may use the information collected on and through the Company's websites to process orders, determine buying trends and provide a more personalized experience on the Company's websites.

Cantel may share collected information with affiliated companies, subcontractors, service providers or business partners of the Company, subject to applicable Company privacy policies, but does not currently sell, trade or rent personal information to any other companies or individuals.

Collected information may be disclosed as necessary by law, legal process, litigation or request from public or governmental authorities within the user's country of residence, or as required by a governmental agency or court with valid authority to require or compel such action by the Company under applicable law.

Additionally, the Company reserves the right to disclose, without notification, collected information, if such disclosure is reasonably necessary to enforce the relevant Terms of Use for the Company's websites, to protect users of the Company's websites or to safeguard the operations of the Company.

The requirements outlined in the Company's *Privacy Policy* are subject to relevant country, federal, state, province, and local jurisdiction laws, rules and regulations. In the case that such laws, rules and regulations conflict with the requirements found in the *Privacy Policy*, the pertinent laws, rules and regulations will supersede the requirements of the *Privacy Policy*.

Cantel also abides by appropriate international privacy frameworks. If there are any conflicts between the standards set forth in the Company's *Privacy Policy* and an international privacy policy framework, the international privacy framework, law, rule or regulation will govern.

Please refer to the complete *Privacy Policy* and applicable laws, rules and regulations for more details.

Clinical Studies

In certain instances, certain personal information may be obtained through clinical studies or trials or while providing technical support. Such information must be treated as confidential and must be released only on a "need to know" basis.

Employee Information & Privacy

Team Member's personal information is considered confidential. That may include, but is not limited to, salary information, references, health information, home address and phone numbers, and so forth. Any inquiries for employee information, past or present, should be directed to the Human Resources Department.

Cantel maintains a personnel file on each employee, which includes the employee's job application, resume, record of training, salary increases and other employment records. It is important that employees provide Cantel with the most current information on their educational accomplishments, certifications, skills learned or other qualifying change, to keep their personnel file up to date.

It is Cantel's policy to provide limited responses to requests for information regarding current, retired or terminated employees. All such requests are to be referred to, and answered by, the Human Resources Department. The only information that Cantel will verify are dates of employment, title and, with written authorization from the employee, salary. No Team Member is authorized to ever give a personal opinion on any other employee's work performance, work approach, work behaviors or anything else on the behalf of the Company, or in the context of an official business request, without prior written approval by an officer of the Company.

Protected Health Information

Protected Health Information (PHI) and electronic PHI (ePHI) is safeguarded according to state and federal law. Special legal requirements also pertain to the confidentiality of mental health, substance abuse, abortion, venereal disease information and other conditions. Cantel sites where health information is stored have specific policies and procedures regarding the physical security of PHI and ePHI. Additionally, all of our computer systems or data files that contain ePHI have appropriate access controls in order to limit access to this information only to authorized employees. Team Members are required to abide by all applicable laws as well as Company codes and policies related to PHI and ePHI.

A complete copy of the *HIPAA Notice of Privacy Practices* is available from the Human Resources Department.

Information Systems

Certain Team Members receive personal computers and email and Internet access to assist with their job responsibilities. Our computer resources are primarily for business use. However, limited personal use is acceptable and individual supervisors are responsible for setting limits.

As it relates to Company-owned or provided hardware or software, Team Members should respect each other's privacy and may not use the passwords of other Team Members in order to obtain private or protected information. A Team Member may not share his or her Company passwords with others or allow others to use his or her email accounts.

The Company, at its discretion, may monitor emails and Internet usage. Additionally, an *Information Security Policy* is in effect governing computer software, hardware and networks. All Team Members with computer access are required to acknowledge this policy.

A complete copy of the *Information Security Policy* is available online or in the Information Systems Department. Please also refer to the *Policy on Use of Personal Electronic Devices*, the *Code on the Security and Privacy of Personal Electronic Devices*, the *Cell Phone Policy*, and other applicable Company codes and policies for further details on the proper use of information systems.

REPORTING & ACCOUNTABILITY

PUBLIC COMPANY REPORTING

As a public company, we are required to provide information and reports that are included in filings with the SEC. Team Members may be called upon to provide necessary information to assure that the Company's public reports are complete, fair and understandable. The Company expects Team Members to take this responsibility very seriously and to provide prompt, complete and accurate answers to inquiries related to the Company's public disclosure requirements. It is critical that any Team Member provide accurate and timely information to assure that information and reports are complete, fair and understandable and in accordance with public disclosure requirements.

FINANCIAL RECORDS & ACCOUNTING POLICIES

Cantel's corporate books, records, financial statements, etc. must accurately represent the Company's business matters and are maintained in accordance with legal requirements and internal policies. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law, rule or regulation and approved by an officer of Cantel in writing.

The Company's policy is to comply with all applicable financial reporting and accounting regulations applicable to the Company. If a Team Member has concerns or complaints regarding questionable accounting or auditing matters of the Company, then he or she is encouraged to submit those concerns or complaints, anonymously, confidentially or otherwise, to the Audit Committee of the Cantel Medical Corp. Board of Directors, which will, subject to its duties arising under applicable law, regulations and legal proceedings, treat such submissions confidentially. Such submissions may also be directed to the attention of (a) the Nominating and Governance Committee of the Board of Directors, (b) the Cantel Legal Department or the Cantel Compliance Department at 973-890-7220, or (c) Cantel's Anonymous Reporting Hotline which is maintained by an independent third party at 800-826-6762 (English), 800-297-8592 (Spanish), or by visiting www.cantelmedical.alertline.com. For additional, detailed instructions regarding reporting mechanisms, including international dial-in numbers for the Company's Anonymous Reporting Hotline, please refer to the Corporate Governance page of the Company website at http://www.cantelmedical.com/investor/corp_govern.html.

Nothing in this Code prohibits Team Members from reporting possible violations of any federal law, rule or regulation to any governmental agency or entity including, but not limited to, the Department of Justice, the SEC, Congress, and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of any federal law, rule or regulation.

RECORD RETENTION

All Company records, including financial records and confidential Team Member files, are maintained and protected according to Company record retention policies and legally required guidelines. In accordance with these policies and laws, in the event of litigation or governmental investigation, please consult the Company's Chief Executive Officer or other Company officer, and applicable Company policies and guidelines.

AMENDMENT, MODIFICATION & WAIVER

As appropriate, the Nominating and Governance Committee or the Audit Committee of the Cantel Medical Corp. Board of Directors, shall consider and act upon any requests for waivers from this Code. This Code may be amended, modified or waived by the Board of Directors,

subject to the disclosure and other provisions of the Securities Exchange Act of 1934, and the rules thereunder, and the applicable rules of the New York Stock Exchange.

**RECEIPT & ACKNOWLEDGEMENT
OF THE
CANTEL CODE OF CONDUCT**

I have read and understand the Cantel Code of Conduct. I understand that I am responsible for complying with the Cantel Code of Conduct and other Company codes and policies, and will report any incidents or issues related to compliance to the Cantel Compliance Department or the Cantel Legal Department, other appropriate individual or department indicated in this Cantel Code of Conduct or the Cantel Anonymous Reporting Hotline.

My signature indicates that I have read and understand and will appropriately comply with the Cantel Code of Conduct. I have reported, and will continue to report, all compliance issues that I am aware of at Cantel.

Team Member Name (please print)

Team Member Signature

Date