Purpose

Charles River Laboratories International, Inc. (including its subsidiaries and affiliates, the "Company," "Charles River" or "we") strives to follow the highest ethical standards in all our business transactions around the world. While we abide by business customs and market practices in the countries in which we do business, **we do not allow or participate in any corrupt business practices (including, but not limited to, bribery)**. In order to comply with legal obligations arising in any of the jurisdictions in which we operate, we have implemented this Policy establishing our expected standards of legal and ethical business dealings worldwide.

Scope

This Policy applies worldwide to all employees, officers, directors, agents, and representatives operating on behalf of the Company, whether full-time, part-time, temporary, or permanent, wherever located (for purposes of this Policy, "Representatives"). This Policy may exceed our actual legal obligations in any specific territory. However, to ensure consistency Company-wide, this Policy will be applied uniformly for all of our business dealings in any and all territories.

Definitions

Bribe: Anything of value that is offered, promised, paid, provided, or authorized in order to gain any improper commercial, contractual, regulatory, or personal advantage. A bribe can take many forms and is not necessarily money or has monetary value. It can be any benefit that provides value to the recipient.

Facilitating Payment: Any payment offered to a government official that is intended to help secure or expedite performance of "routine governmental actions" that are "ordinarily and commonly performed" by the governmental official as part of their official functions.

Government Official: Any (1) officer or employee of a government, or any department, agency, or instrumentality thereof (which includes government-owned or government-controlled state enterprises), (2) any person acting in an official capacity for such government or organization, or (3) any candidate for political office of a government. Thus, "government officials" include not only elected officials, but also consultants who hold government positions, employees of companies owned by governments, political party officials and others.

Third Party: Any external business partner engaged by the Company that is expected to interact with others (including government officials) on behalf of Charles River.

POLICY

As a public company with its corporate headquarters in the United States (U.S.) and operations around the world, there are specific U.S. laws that apply to all parts of our Company wherever located regarding the conduct of business. Other jurisdictions in which we operate also have, or may in the future enact, similar laws governing the conduct of business worldwide. The purpose of this Policy is to serve as a guide and establish expectations for each of us on ethical business conduct and our responsibilities to Charles River in the conduct of business worldwide. This Policy should be considered a supplement to, and not a substitute for, our Code of Business Conduct and Ethics.

WHAT ARE THE BASIC PRINCIPLES OF OUR ANTI-BRIBERY POLICY?

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all of us. All Representatives are required to avoid any activity that might lead to, or suggest, a breach of this Policy. This Policy applies to anyone with whom we interact when conducting Charles River business (whether commercial or governmental).

As a general rule, our Representatives are prohibited from directly or indirectly offering a bribe to any third party, receiving a bribe from any third party, or attempting to bribe a government official.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this Policy has occurred or may occur in the future. For example, if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

By a "bribe," we mean anything of value offered, promised, paid, provided, or authorized in order to gain any improper commercial, contractual, regulatory, or personal advantage.

The following list is not exhaustive but sets out some examples of conduct which is not acceptable for you (or someone acting on your behalf) to do:

(a) give, promise to give, or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;

(b) accept payment from a third party that you know, or suspect, is offered with the expectation that it will obtain a business advantage for them;

(c) accept or require a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;

(d) threaten or retaliate against another worker who has refused to commit a bribery offense or who has raised concerns under this Policy; or

(e) engage in any activity that might lead to a breach of this Policy.

By "third party," we mean any business partner engaged by the Company that is expected to interact with others (including government officials) on our behalf. Examples of third parties include:

- **Agents (including sales agents)**
- **Distributors**
- **Brokers**
- **Intermediaries**
- **Advisors**
- **Consultants**
- **Suppliers**
- **Joint venture partners**
- **Co-investors**
- **Other professional advisors (e.g., tax, legal, accounting, lobbyists)**
- **Licensees**
- **Travel agents**
- **Freight forwarders**
- **Customs brokers or agents**
- **Finders**

It is impossible for this Policy to cover every situation or the specific laws or regulations that may govern our dealings in all countries (such as export control laws, anti-tax evasion laws or anti-boycott laws). Accordingly, we encourage you to obtain guidance from Legal Compliance or our Corporate Legal Department before entering into business discussions or any agreement that you believe may be impacted by this Policy. We especially ask you to obtain guidance when you are conducting business or proposing to conduct business with a non-U.S. customer or representative, particularly one with whom we have not conducted business before.

HOW DO LAWS IN DIFFERENT COUNTRIES RELATE TO THIS POLICY?

First and foremost, our Policy requires you to comply with the laws of the country in which you are doing business. As of the revised date of this Policy, the two most prominent anti-bribery laws are the U.S. Foreign Corrupt Practices Act of 1977 ("FCPA"), and the U.K. Bribery Act 2010 (the "Bribery Act"). In addition, many jurisdictions have introduced legislation making it a corporate criminal offence to facilitate the evasion of taxes, including the UK Criminal Finances Act 2017 ("UK CCO"). Because the scope of these laws is essentially worldwide, you are expected to observe this Policy in all territories.

If you have any doubt about the applicable law of a country, or if another country's law appears to conflict with this Policy, consult with Legal Compliance or the Corporate Legal Department.

HOW DOES THIS POLICY SPECIFICALLY APPLY TO OUR INTERACTIONS WITH GOVERNMENT OFFICIALS?

All Charles River Representatives are prohibited from bribing "government officials."

Both direct and indirect payments to government officials are prohibited. Charles River can face liability based on improper payments made by our third parties (including distributors, agents, consultants, brokers, business partners or suppliers who act on behalf of Charles River). Accordingly, except as set forth in this Policy, neither the Company nor any of its Representatives or business partners are allowed to make, promise or authorize any gift, payment or offer anything of value on behalf of the Company to a government official or to any third party (such as a distributor, agent, consultant, broker , business partner or supplier) who, in turn, is likely to make a gift, payment or offer anything of value to a government official. Payments by or on behalf of Charles River should always be strictly for services rendered and the amount paid should be reasonable and customary for the services provided. **You may not use your own personal funds to accomplish what is otherwise prohibited by this Policy.**

Identifying whether an individual is a "government official" can be difficult and not always obvious. Here are some examples of the different types of government officials you may encounter:

- **Employees of government agencies, departments, or ministries**
- **Public international groups (e.g., World Health Organization)**
- **Issuers of government permits, approvals, or licenses**
- **Airport authorities**
- **State-owned laboratories, factories, or other businesses**
- **Customs officials**
- **Immigration or tax officials or ministers**
- **Representatives of foreign governments (including royal parties)**
- **Public hospital or university employees**
- **Elected officials or candidates for political office at any level**
- **Members of law enforcement or military**
- **Family members of government officials**

Laws of certain jurisdictions (including U.S. law) also make it illegal for government officials to demand or accept bribes from individuals or organizations. Additionally, this Policy prohibits any facilitation of tax evasion to government agencies.

What types of payments to government officials are acceptable?

Payments and reimbursements to government officials directly related to the promotion, demonstration and/or explanation of our products or services, and/or in connection with the execution or performance of a contract between Charles River and a governmental entity may be permissible in certain circumstances. For this exception to apply, however, the payments or reimbursements must be reasonable and bona fide (i.e., there can be no expectation that, in return for the payment or reimbursement, the government official will misuse his or her authority to give or keep business with any entity or to otherwise give any entity an unfair advantage over any other entity). Because proving the lack of a corrupt intent is difficult, **you must obtain prior written approval from Legal Compliance or the Corporate Legal Department before making any type of payment or reimbursement (or an offer of any such payment or reimbursement) to a government official for the purposes described in this subsection.** If the making (or offering) of any such payment or reimbursement to a governmental official is authorized, you will be expected to document facts evidencing the proper intent.

Notwithstanding the foregoing, no such payment or reimbursement will be authorized if:

- we have non-routine matters pending a decision in the government agency for which the government official works;
- it is to be made in cash;
- it is intended as a stipend or for spending money;
- it is for souvenirs, unless they carry Charles River and/or the host's logo and are of nominal value (e.g., shirts or tote bags);
- it is for spouses, family, or other guests; or
- unless it is otherwise directly related to the promotion, demonstration and/or explanation of our products or services, and/or in connection with the execution or performance of a contract between a foreign government entity and us.

Are we allowed to exchange business courtesies with government officials?

Before offering, giving, or accepting a business courtesy (gift, entertainment, or hospitality) to or from a government official, you must take particular care to follow the policies and procedures outlined here and in the Company's Conflicts of Interest and Business Courtesies Policy.

As a general rule, no business courtesies of any kind may be offered to or received from any government official without the prior approval of Legal Compliance or the Corporate Legal Department.

Gifts

A gift is anything of value, including cash, cash equivalent gift cards, gift certificates, favors, services, and promises to do something in the future, that you or anyone acting on your behalf, including anyone in your family, household or with whom you have a close personal relationship, either gives or receives. Gifts purchased with your own money or partially with your own money are included in this Policy.

Gifts to government officials may be appropriate if they are unsolicited, business-related, not cash or usable as cash (e.g., gift cards and gift certificates) and are of minimal value (no more than US$25). However, gifts to government officials are never permissible in the following instances:

- During a procurement or sales process: You may not offer, give nor receive a gift or business courtesy if you are involved in any stage of a procurement or sales process in which we are either a current or potential customer or business provider.
- Intended to influence or reward the recipient: Offering or giving gifts to, or accepting gifts from, a third party (including a government official) which could influence (or appear to influence) the business judgment of that third party or government official, is never appropriate and may lead to criminal or civil penalties.

If any third party (including a government official) offers you a gift in exchange for business or any type of service, you must decline the offer and contact Legal Compliance or the Corporate Legal Department immediately.

Entertainment and Hospitality

Providing excessive or lavish entertainment or hospitality to third parties (including government officials) is strictly prohibited by this Policy. It will automatically be assumed that any entertainment or hospitality valued above US $250 per person is excessive. Entertainment and hospitality includes travel, hotel accommodations, meals and cultural or sporting events. If you attend an event with a third party (including a government official), tickets for such event will be considered entertainment. If you do not attend the event with a third party (including a government official), the tickets are considered to be a gift and subject to the gift restrictions discussed above.

Representatives should only offer or accept entertainment or hospitality that is appropriate, reasonable for promotional purposes, provided in the normal course of an existing business relationship, and is an occasion where business is discussed. Employees should never offer entertainment or hospitality as a means of influencing business decisions of a third party (including government officials). The appropriateness of a particular type of entertainment or hospitality, of course, depends upon both the reasonableness of the expense and on the type of activity involved. Styles of entertainment or hospitality that are likely to compromise Charles River's reputation as a non-discriminatory company are always inappropriate. For instance, adult entertainment venues are never appropriate.

To ensure that a business courtesy is appropriate, you should review the Company's Conflicts of Interest and Business Courtesies Policy and you must obtain prior approval from Legal Compliance or the Corporate Legal Department before accepting or offering gifts, entertainment or hospitality that involves a government official.

HOW DOES THIS POLICY RELATE TO THIRD PARTIES WE USE?

Because we may be liable for an illegal act performed by a third party (including distributors, agents, consultants, brokers, business partners and suppliers acting on our behalf) in connection with our business, the selection of our third parties must be made only after careful deliberation and the consideration of all information available regarding their references and past performance. This information includes, among other things, any contingent or retainer fee, their qualifications, and their integrity. Those Representatives dealing with third parties who will be representing the Company should familiarize themselves with potential red flags. Such "red flags" include:

- Requests for unusual payments or financial arrangements, such as payments to a numbered bank account, payments to accounts in countries other than where the agent is located or business is to be performed, a change to a purchase or service order to enable invoicing from a Company-affiliated entity which has not performed the work, or payments to low tax jurisdictions;
- Cash payments;
- Requests for unusually high commissions;
- History of corruption or tax evasion in a particular country;

- Questionable reputation of the third party;
- Lack of transparency in a third party's accounting records for his/her expenses;
- Inflated invoices;
- Questionable relationship between the third party and government officials; and
- Apparent lack of qualifications or resources on the part of the third party to perform the services offered.

To help the Company identify potential red flags and ensure we partner with ethical and responsible third parties, Charles River's Legal Compliance team oversees a Third-Party Risk Management (TPRM) process that is required globally whenever a Company employee wishes to work with certain third-party partners. This process entails (1) an initial risk assessment of the proposed third party, (2) completion of risk-based due diligence by the proposed third party and (3) execution of a written contract. Additional guidance regarding the TPRM process is published on the Legal Compliance page on the Company's intranet site.

Under no circumstances may any Charles River Representative authorize or request a third party to provide services prior to the execution of a written agreement with the Company covering the services to be provided.

If you identify a potential "red flag" or have any doubt about the legal or ethical standing of a third party (including any distributors, agents, consultants, brokers, business partners or suppliers acting on behalf of Charles River), consult with Legal Compliance or the Corporate Legal Department.

ARE WE ALLOWED TO PROVIDE FACILITATING (OR EXPEDITING) PAYMENTS?

In general, Representatives are prohibited from giving, promising to give, or offering to give certain *facilitating or expediting payments* to government officials to secure their performance of 'routine governmental actions.' However, our Policy recognizes that the anti-bribery laws in different jurisdictions have different positions on the legality of such "***facilitating***" payments. Accordingly, if a facilitating payment is required, and such payment is not otherwise in violation of this Policy, Legal Compliance and the Corporate Legal Department will review such proposed payment on a case-by-case basis. **However, under no circumstance should any such payment be made without prior approval of Legal Compliance or the Corporate Legal Department.**

For purposes of this Policy, "***routine governmental actions***" are only those actions which are "***ordinarily and commonly performed***" by the governmental official as part of their official functions in connection with one of the following activities:

- obtaining permits, licenses, or other official documents to qualify a person to do business in a foreign country;
- processing governmental papers such as visas and work orders;
- providing police protection, mail pick-up and delivery or scheduling inspections associated with contract performance or inspections related to transit of goods across country;

- providing phone service, power, and water supply, loading, and unloading cargo, or protecting perishable products or commodities from deterioration; and

- actions of a nature similar to those described above.

If a facilitating payment (or gift) is authorized, it must be accurately recorded in our books and records.

IS CHARLES RIVER PERMITTED TO MAKE POLITICAL CONTRIBUTIONS?

- Charles River complies with all federal, state, and local laws that regulate political contributions and activities. The Company will not contribute funds in anticipation of, in recognition of, or in return for an official act or anything that has appearance of a gratuity, bribe, trade or quid pro quo of any kind. Please consult the Company's Political Contributions Policy to learn more about the Company's policy and direct any questions to the Corporate Legal Department.

IS CHARLES RIVER PERMITTED TO MAKE CHARITABLE CONTRIBUTIONS?

All charitable contributions, such as donations, sponsorships, Company volunteer activities and in-kind donations are coordinated and aligned with Company goals. Charitable contributions made by Charles River through the CRL Cares program (or other Company-approved program) must be in alignment with our areas of focus and in support of a quality charity. Charles River, and its employees, officers, and board members, must not receive any improper advantage or benefit for the Company as a result of the contribution.

ARE WE REQUIRED TO KEEP ANY PARTICULAR RECORDS OR ACCOUNTS?

Anti-bribery laws require the Company to keep our books, records, and accounts in reasonable detail, accurately and reflective of all transactions and dispositions of our assets. These accounting standards are applicable to all of our businesses and require that employees report all cash payments made to third parties in reasonable detail, including the amount of the payment, the recipient, and the purpose for the expenditure. These standards are meant to prevent 'off-the-books' accounts which might be used to conceal improper payments.

In accordance with applicable anti-bribery laws, all employees must ensure that we have accurate and timely information with respect to the amount and ultimate recipient of contract payments, commissions, and other payments. Similarly, you should declare and keep a written record of all gifts, entertainment or hospitality accepted or offered, which may be subject to management review. You must also document the purpose and maintain all necessary approvals for all of our transactions.

Any Representative who creates a false or misleading entry or fails to disclose payments or assets will be subject to immediate disciplinary action, which may include employment termination. **If you learn of any false or misleading entries, or unrecorded payments, you should report it immediately to Legal Compliance, the Corporate Legal Department or via the Helpline.**

In addition, we must be accurate and truthful in representing all of our business transactions to government agencies. All information furnished to any government officials, or third parties hired by us to facilitate imports and exports must be accurate and truthful.

ARE WE PROHIBITED FROM DOING BUSINESS IN CERTAIN COUNTRIES OR WITH CERTAIN PERSONS ALTOGETHER?

Government authorities in jurisdictions across the globe, including the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), administer embargo and sanctions programs for political or national security reasons**.** These embargo and sanctions programs typically block the assets of, and prohibit transactions with, specific countries, entities and/or individuals (e.g., terrorists or terrorist organizations, drug traffickers, or nationals or entities of embargoed countries).

As of the date of this Policy, the list of countries subject to embargoes or sanctions programs includes the following countries: **Cuba, Iran, North Korea, Russia, Sudan, Syria, and certain areas of the Ukraine including but not limited to the Crimea region.** Changes in Policy, and of the identity of countries and persons or entities subject to embargo, can occur at any time. **Therefore, you should check with Global Trade Compliance and the Corporate Legal Department before doing business in a country which we do not presently do business.**

HOW DOES THE COMPANY ENSURE COMPLIANCE WITH THIS POLICY?

Every employee whose job duties involve the areas covered by this Policy will be required periodically to complete mandatory training, review Legal Compliance communications, and certify to this Policy.

Similarly, all of our third parties (including distributors, agents, consultants, brokers, business partners and suppliers acting on our behalf) are required to comply with anti-bribery laws, including the FCPA, the Bribery Act and other related laws. Our zero-tolerance policy to bribery and corruption must be communicated to suppliers, contractors, and business partners at the outset of our business relationship with them and as appropriate thereafter.

HOW SHOULD WE RAISE QUESTIONS OR REPORT POTENTIAL VIOLATIONS OF THIS POLICY AND WILL WE BE PROTECTED FROM RETRIBUTION IF WE COMPLY WITH THIS POLICY?

You are required to report any actual or perceived violations of this Policy or of law so that potential violations can be investigated and dealt with appropriately. Please raise any doubts or questions that you have to Legal Compliance or the Corporate Legal Department immediately.

Alternatively, you may report any matter on a confidential and, if you choose, anonymous basis, via our Helpline at helpline.criver.com or via the Helpline telephone numbers set forth at the website for your respective country.

Do not try to assess the legality of a questionable request or action on your own. When in doubt, you should contact Legal Compliance or the Corporate Legal Department.

Representatives who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion of an actual or potential bribe or other corruption offence. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. **If you believe that you have suffered any such treatment, you should inform the Human Resources or the Corporate Legal Department, or, alternatively, you may report such treatment on a confidential and, if you choose, anonymous basis, via our Helpline website at** helpline.criver.com **or via the Helpline telephone numbers set forth at the website for your respective country.**

HOW WILL THIS POLICY BE MONITORED AND REVIEWED?

Legal Compliance will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as practicable. Internal control systems and procedures will be subject to regular audits.

All Representatives are invited and encouraged to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to Legal Compliance.

GENERAL

This Policy replaces and supersedes any and all previous policies relating to the subject matter of this Policy. The Company reserves the right to amend or terminate this Policy as the Company deems necessary or warranted. Non-material amendments or clarifications to this Policy may be approved in the sole discretion of the Corporate Legal Department.

Nothing in this Policy is intended to be inconsistent with or otherwise violate the laws or regulations in any particular jurisdiction. To the extent a conflict exists, Representatives should adhere to the local laws or regulations, and promptly notify Legal Compliance or our Corporate Legal Department.

This Policy does not form part of any employee's contract of employment (to the extent an employee has an existing employment contract) and it may be amended, revised, or otherwise modified at any time.

The Company reserves the right to amend or terminate this Policy at any time as the Company deems necessary.

ROLES AND RESPONSIBILITIES

Board of Directors: Has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all Representatives under our control comply with it.

Legal Compliance: Has primary responsibility for overseeing implementation of this Policy, and for monitoring its use, effectiveness and dealing with any queries on its interpretation.

Corporate Legal Department: Together with Legal Compliance, supports implementation and ongoing Company compliance with this Policy.

Representatives: Responsible for understanding and complying with this Policy, reporting potential violations of this Policy, and reviewing required training and communications about this Policy.

Global Trade Compliance: Has responsibility for helping to ensure compliance with global sanctions and embargoes.

EXCEPTIONS/WAIVERS

Requests for waivers, exemptions, or exceptions to this policy must be submitted in writing to Legal Compliance and approved in advance by the General Counsel.

ENFORCEMENT

Violations of anti-bribery laws pose significant civil and criminal penalties both to Charles River and to you individually, including fines and imprisonment. Additionally, violations of this Policy can seriously damage our reputation and ability to conduct business.

We will take appropriate steps to monitor and audit compliance with this Policy and will investigate abuses. Failure to abide by this Policy is grounds for discipline, up to and including termination of employment (including termination of any contractual relationship, if applicable). Suspected criminal activity will be referred to the appropriate law enforcement authorities.

RELATED DOCUMENTS

Code of Business Conduct and Ethics

Conflicts of Interest and Business Courtesies Policy

Global Giving Policy

Global Trade Compliance Policy

Political Contributions Policy

Records Management Policy

Supplier Code of Conduct