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ENVIGO

Supplier + Code of Conduct



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01 // Our supplier Code of Conduct



Conducting business in an ethical and sustainable way is the cornerstone for our vision, mission and values



At Envigo, our employees provide mission-critical products and research services for biopharmaceutical, crop protection, and chemical companies as well as universities, governments, and other research organizations.

Our company is founded on the principle that research partnerships depend on integrity, unmatched expertise, unwavering dedication to customer service and shared goals. It is important to us to build open and honest partnerships with our stakeholders, and as such, we expect our suppliers and their representatives to share the same ethos in conducting business with integrity.

A responsible company is one that pursues an ethical path for long-term success and growth, and that is why Envigo's Global Supplier Code of Conduct is integral to our mission of being the best company to work with and the best company to work for.

This document provides you with the guidance and support needed to honour your commitment of working with integrity and in partnership with us. The processes, procedures and policies referenced throughout offer you a simple and practical guide to how Envigo operates and what we expect of our partners.

Our suppliers operate in different legal and cultural environments throughout the world and as such we expect them to comply with the laws, rules, regulations and policies of the countries and locations in which they operate. It is our responsibility to require that all suppliers and their facilities meet the standards and promote the principles outlined in this Code, the provisions of which are in addition to, and not in lieu of, any legal document or contract between Envigo and the supplier.

Conducting business in an ethical and sustainable way is the cornerstone for our vision, mission and values and how we interact with our customers and across our supply network.

Thank you for helping us continue to grow as a responsible business by always doing the right thing.

Joe Bondi
VP, Finance and Procurement

July 2019

Our vision, mission and values

Vision | Working together to build a healthier and safer world

Mission | To be the best company to work with and the best company to work for

Values | Our values are the foundation upon which we can build our success

Doing our best work, together, every day



Caring about each other, our animals and the environment



Being honest and respectful



Always learning, challenging and improving



We operate in countries throughout North America, Europe, Middle East, and Asia and employ thousands of dedicated people who embody our company values. These values form the basis for how we do business, and they help differentiate us in our marketplaces. Creating a culture where employees and suppliers understand and embrace these values is essential to our continued success.



02 // Looking after our people,
our customers and our animals



2.0 Ethics



Envigo is committed to conducting business with high ethical, legal and socially responsible standards.



Envigo is committed to conducting business with high ethical, legal and socially responsible standards. Suppliers are expected to conduct business lawfully, in an ethical manner and with integrity in accordance with the following aspects:

2.1 Business integrity

Envigo is committed to ensuring the prevention of bribery in all parts of its business and to conducting all of its activities in an honest manner.

We are dedicated to the highest standards of corporate conduct underpinned by mutual respect for our suppliers, partners, customers and employees. We expect our suppliers to conduct their business in an ethical manner in accordance with all applicable laws and regulations. Suppliers must comply with our Anti-Corruption and Bribery Code, any form of corruption, extortion, and embezzlement is strictly prohibited.

2.2 Fair competition

Envigo believes fair competition benefits all our stakeholders as it promotes efficiency and innovation. Suppliers to Envigo must practice fair competition in accordance with all applicable local or national anti-trust laws.

2.3 Animal welfare



At Envigo, we are committed to globally implementing the highest standards of animal welfare.



At Envigo, we are committed to globally implementing the highest standards of animal welfare. Our animal welfare policy brings a harmonized approach to the ethical use of animals through:

- + actively fostering a culture of care at all levels towards the animals used and bred at Envigo
- + complying with all applicable national and local regulations with regard to the care and use of animals within our establishments
- + achieving the highest standards of animal welfare that are compatible with attaining the scientific objectives of the studies conducted and breeding performed
- + implementing the 3R principles of 'Reduction, Refinement and Replacement'
- + fostering and encouraging the application of these objectives with our customer community and to the scientific community at large

Employees and suppliers contribute directly or indirectly to the safety and welfare of our laboratory animals. Envigo expects its suppliers to help maintain the highest standards of animal safety and quality by providing quality products and services to Envigo.

2.4 Confidentiality



Disclosure of confidential information or use of Envigo trademarks and copyrighted information requires approval in writing.



Suppliers shall safeguard and prevent unauthorized disclosure of confidential or sensitive information by keeping it secure, limiting access and avoiding discussing or revealing this information in public places.

This includes trade secrets, intellectual property, Envigo's customer information, production methods and equipment, financial information, electronic data and any other information considered confidential. Disclosure of confidential information or use of Envigo trademarks and copyrighted information requires approval in writing.

Suppliers must ensure the use of Personal Data and Special Category Personal Data are Limited to the purpose for which it was provided and that any processing of such data is compliant with relevant data protection laws, regulations and principles. These requirements extend even after the conclusion of a supplier's business relationship. Envigo reserves the right to have executed confidentiality or nondisclosure agreements in place with suppliers and manufacturers to safeguard this information.

2.5 Conflicts of interest



Conflicts of interest between our business interests and personal interests must be avoided.



A conflict of interest occurs when an individual's private interest (or the interest of a member of his or her family) interferes, or even appears to interfere, with the interests of Envigo as a whole. A conflict of interest can arise when a colleague, supplier or Envigo partner (or a member of his or her family) takes actions or has interests that may make it difficult to perform his or her work for, or on behalf of, Envigo objectively and effectively.

Conflicts of interest also arise when a colleague, supplier or Envigo partner (or a member of his or her family) receives improper personal benefits as a result of his or her position in, or related to, the company.

Suppliers are required to avoid conflicts of interest by operating with full transparency with respect to any situation where a conflict does or may arise.

Suppliers shall not offer, directly or indirectly, gifts, money or anything of value in an attempt to improperly influence or secure a business advantage or decision. It is customary in many cultures or companies for suppliers to entertain customers with lunch, dinner or gifts of nominal value. Importantly, gifts or entertainment offered to, or by, Envigo employees must not be excessive or construed as an attempt to influence business decisions and must never be in any form of cash, checks, gift certificates or gift cards. Suppliers must disclose any actual or potential conflict of interest including and not limited to where an Envigo employee, or family member, may have an interest of any kind with the supplier.



03 // Our integrity



3.0 Management

Suppliers are expected to promote and maintain policies, management information systems, human resources and facilities required to ensure compliance with all applicable laws, regulations and the standards contained within this code of conduct.

3.1 Health and safety



All colleagues shall comply, both in letter and spirit, with all applicable laws.



At Envigo, safeguarding the health and safety of our colleagues is paramount to our culture, integral to the success of our business and ensures compliance with the relevant Health and Safety legislation at all of our locations globally.

We have a safeguarding policy, and our aim is to create a safe, professional working environment in which all colleagues, suppliers and partners feel a sense of pride in contributing to the success of our organization.

We are committed to consulting with colleagues on matters of health and safety and actively promote an open and honest conversation, encouraging everyone to identify and report hazards so that together we can all contribute to creating and maintaining a safe working environment. We strive to provide a safe, healthy and productive work environment and recognize that positive health and safety management benefits our colleagues, their families, our customers, our suppliers and all our stakeholders.

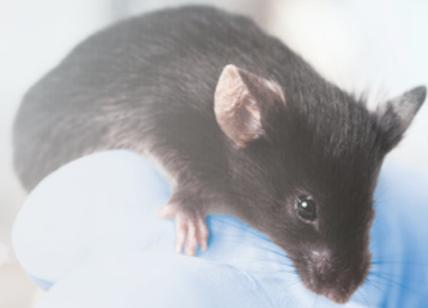
We are committed to providing clear expectations, and resources in terms of facilities, equipment, training, expertise and time. We also ensure all facilities, processes and systems of work are designed to take account of health and safety and that our colleagues are appropriately supervised to protect their wellbeing. Global health and safety related performance will be regularly monitored to ensure that company objectives are achieved. We recognize that to fulfil our objectives and responsibilities we must have a risk-informed and engaged workforce that accepts fully the health and safety responsibilities of their role within the business.

Suppliers must provide workers with a safe, healthy and secure work environment and adhere to local health and safety laws, regulations and standards. They shall ensure that all workers receive communication and training on emergency planning and safe work practices. They should take proactive measures to support accident prevention, minimizing health risk exposure and preventing violent behaviour in the workplace. Our suppliers must have systems in place to prevent, detect and respond to potential risks to the safety, health and security of all employees.

3.2 Quality



Our approach to quality management is focused on product and service quality and the means to achieve it.



The quality of our products and services is critical, as the work we do is used to determine human, animal and environmental safety and efficacy, so it is essential that it can be trusted.

Quality is the result of the intent of all our people to consistently provide, either directly or indirectly, fit-for-purpose products and services to our customers through robust planning, processes, quality control, quality assurance and continuous improvement. Our approach to quality management is focused on product and service quality and the means to achieve it.

We recognize that the provision of quality products and services is vital to our growth, success and reputation. Our brand promise is to work closely and collaboratively with our customers, making sure we understand what they need and delivering quality products, scientific research and customer service that helps them secure the potential of their essential research and products.

Suppliers have a direct impact on our ability to meet this commitment and, therefore, must have in place policies and procedures to manage the quality and safety of products delivered to us. Suppliers are expected to seek continuous improvement adopting the corrective and preventative actions where deficiencies have been identified ensuring an ongoing commitment to quality.

3.4 Business continuity

Suppliers are expected to maintain adequate business continuity provisions to continue to provide products or services to Envigo in the event of any kind of operational crisis including but not limited to disruption caused by natural disasters, equipment failure, power or communications outage, cyber-attack, terrorist act or similar. The supplier agrees upon request to share evidence and discuss the details of its business continuity plans and information security systems, and controls.

3.5 Diversity and inclusion



Building a talented and diverse workforce strengthens our company and competitive advantage.



Our partners play an important role in creating an open and inclusive workplace, where every individual is able to fully contribute to our success. Building a talented and diverse workforce strengthens our company and competitive advantage.

Envigo is an equal opportunity employer that does not discriminate on the basis of race, religion, color, national origin, sex, sexual orientation, gender identity, age, genetic information, status as a protected veteran or status as a qualified Individual with a disability, or any other characteristic protected by applicable federal, state or local law.

To champion these important values, we expect our employees, suppliers and partners to:

- + treat others fairly and with respect and dignity
- + avoid actions that could be considered bullying or harassment, including sexual harassment
- + actively discourage discriminatory behaviour
- + report any suspected discriminatory or harassment acts or practices
- + focus solely on a person's attitude, qualifications, abilities, experience, and performance if we are responsible for hiring, terminating employment, compensation, promotions, or discipline of a colleague.

3.6 Employment



The way we communicate internally and with the outside world is crucial to building trust.



Suppliers are expected to maintain and adhere to policies that respect employees whether permanent or temporary, safeguarding their rights under contracts of employment that comply with local applicable laws and regulations and are free from discrimination.

Workers employed by the supplier to perform an on-site service to Envigo, or, with access to Envigo information or business processes must be screened for pre-employment or pre-engagement to the specification provided by Envigo before commencement of any work. The supplier will ensure that workers without distinction have the rights to freedom of association and collective bargaining.

It is important all personnel are treated equally with dignity and respect and are not subject to any form of harassment, retaliation or intimidation. Envigo expects its suppliers to ensure working conditions are safe, secure, hygienic and free from substance or alcohol abuse. Suppliers should ensure personnel receive routine training in any topics applicable to the roles they are performing which is recorded and available for audit.

As a supplier, you have a responsibility to speak up if you see anything that does not conform to the requirements of our Global Supplier Code of Conduct and the policies and procedures it supports.

Please make your concerns known to your Envigo contact, or if you feel uncomfortable about doing this, please use our anonymous, independent Envigo Integrity Line via www.envigo.com/integrity

3.7 Working hours and compensation



Employees shall be fairly compensated for their work and wages should be comparable to those of similar companies in the local area.



Suppliers must comply with applicable laws and regulations governing employee compensation and working hours. Employees shall be fairly compensated for their work and wages should be comparable to those of similar companies in the local area. Suppliers shall not schedule employees to work more hours than allowed by applicable laws. Voluntary alternative schedules and overtime are acceptable if conducted in compliance with legal requirements.

3.8 Environmental sustainability

Our Environmental Policy helps us reduce environmental impacts from our operations, products and services, manage environmental risks and pursue sustainability initiatives such as reducing waste and promoting recycling.

Our colleagues are required to adhere to these programs, as well as be familiar and comply with environmental laws and regulations that relate to our specific work responsibilities.

Equally, suppliers are expected to adhere to applicable environmental regulations and to conduct their operations in such a way as to minimize the impact on natural resources and to protect the environment.

Suppliers must ensure their operations comply with local laws and are responsible for managing, measuring and minimizing the environmental impact of their facilities. They must maintain sufficient knowledge of input materials and components to ensure products were obtained from permissible sources and may be required to validate the origin. Suppliers should proactively pursue environmental management best practices and sustainability goals and provide assistance to our facilities in meeting environmental objectives.



04 // Our rights



4.0 Human rights



Modern slavery is a crime and a violation of fundamental human rights.



Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At Envigo, we are committed to acting ethically and with integrity. We implement and enforce the right processes and controls in an effort to ensure modern slavery is not taking place anywhere in our business or in our supply chain.

Envigo embraces ethical behaviour and integrity in everything we do with a vision of 'working together to build a healthier and safer world.' Integral to this is a zero tolerance approach to all human rights abuses. In this we are committed to opposing modern slavery in all its forms and improving our practices to combat slavery and human trafficking.

We do not tolerate it either within our business itself or within our supply chains.

4.1 Child labour

Suppliers and subcontractors must ensure an employment policy is in place together with effective means for age verification to meet the requirements set out in the International Labour Organization's (ILO) Minimum Age Convention.

Suppliers must ensure workers younger than the national minimum age are not employed in their supply chains or any part of their business and that **workers under the age of eighteen are not allowed to:**

- + Work in hazardous conditions,
- + Work for more than eight hours per day or primarily at night,
- + Work in a manner that could interfere with vocational education

4.2 Voluntary employment and human trafficking



Suppliers must ensure all workers are employed on a voluntary basis which does not include bonded, forced, or any other form of compulsory labour (including prison labour).



Suppliers shall not use or purchase materials or services from any supplier using any form of slave, forced, bonded, indentured or involuntary labour.

The supplier shall not engage in human trafficking or exploitation and must be able to certify that products or services provided comply with the laws governing these practices in the country or countries in which they do business.

The supplier shall not withhold any identification or travel documents restricting freedom of movement from employees, force employees to work, delay or withhold payment of employees' salaries or employ workers from recruitment agencies that are not appropriately licensed to operate under the applicable laws.

4.3 Migrant labour

Suppliers shall employ workers who are legally authorized to work in their country and are responsible for validating employees' eligibility to work status through appropriate documentation such as work permits.

Suppliers may not withhold official identity documents including passports for migrant worker and must pay all fees for services provided by contractors, contingent labour, and recruitment agencies.



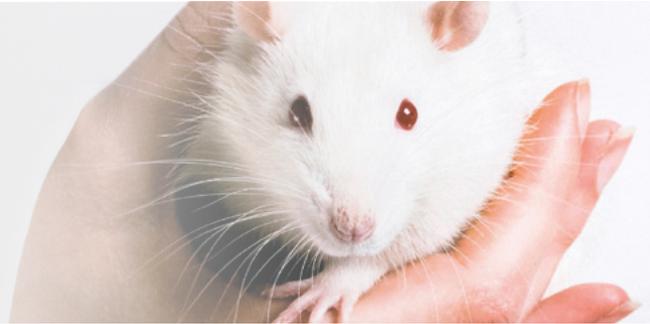
05 // Compliance



5.0 Compliance with this Global Supplier Code of Conduct



Suppliers are also encouraged to promptly report any actual or suspected violation or noncompliance without fear of retribution.



Suppliers are expected to implement the appropriate procedures and controls to be compliant with the requirements set out in this Code of Conduct which includes the following aspects:

Suppliers are requested to communicate this Supplier Code of Conduct to their employees and suppliers. Suppliers are also encouraged to promptly report any actual or suspected violation or noncompliance without fear of retribution. This includes violations or any unethical behaviour by any employee or agent acting on behalf of either the supplier or any Envigo company.

5.1 Communication

The way we communicate internally and with the outside world is crucial to building trust.

At Envigo, we ensure all communications about our business interests are timely, accurate and reflect our values. We also ensure communications comply with our communications policy, approval procedures, and all applicable laws. As a supplier you have the individual right to make personal comments on social media, making it clear that any opinion you express is your own.

However, it's important to remember that only designated spokespeople can make comments on behalf of Envigo. When using social media, you must be careful that you don't inadvertently share proprietary or confidential information about Envigo, our employees, customers or any other stakeholder. Examples could be the early release of sales figures or knowledge of a company restructuring. Our policies around confidential information still apply on personal use of social media accounts.

5.2 Supply chain transparency



Envigo reserves the right to audit compliance with this Global Supplier Code of Conduct.



Envigo reserves the right to audit compliance with this Global Supplier Code of Conduct, which may include facility inspections that include employee interviews and a review of supplier records and business practices. Suppliers to Envigo shall maintain accurate and transparent books, records and accounts to demonstrate compliance with applicable laws and regulations.



If an audit identifies a violation of this Code of Conduct, suppliers shall act promptly to review and approve corrective action plans and then correct identified deficiencies. Envigo reserves the right to end existing business relationships or to decline future business opportunities with suppliers who do not comply with all applicable laws and regulations, and the provisions of this Global Supplier Code of Conduct or the suppliers' similar Codes of Conduct.

