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[To Be Completed by Policy Review Committee]

Anti-Bribery Policy

PURPOSE

Charles River Laboratories International, Inc. (including its subsidiaries and divisions, the “Company” or “Charles River”) strives to follow the highest ethical standards in all our business transactions around the world. All employees can be proud of our reputation as an ethical and responsible company. 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.** 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 ethical business dealings worldwide. In order to ensure worldwide applicability, 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.

POLICY

WHO DOES THIS POLICY APPLY TO?

This Policy applies to all employees, officers, directors, agents and representatives of the Company, whether full-time, part-time, temporary or permanent, wherever located (for purposes of this Policy, “Representatives”).

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.

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 commercial, contractual, regulatory or personal advantage.

The following list sets out examples of conduct which is not acceptable for you (or someone 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**
- **Brokers**
- **Intermediaries**
- **Advisors**
- **Consultants**
- **Representatives**
- **Joint venture partners**
- **Co-investors**
- **Other professional advisors (e.g., tax, legal, accounting, lobbyists)**
- **Licensees**
- **Travel agents**
- **Freight forwarders**
- **Customs agents**
- **Finders**

WHAT ARE THE CONSEQUENCES OF NOT FOLLOWING THIS POLICY?

Each of the laws discussed below has significant civil and criminal penalties, including fines and imprisonment. Additionally, violations can seriously damage our reputation and ability to conduct business. Employees who fail to comply with this Policy will face disciplinary action, up to and including employment termination (including termination of any contractual relationship, if applicable). In addition, violation of the laws discussed below could lead to possible criminal and civil penalties for you individually.

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 or anti-boycott laws). Accordingly, we encourage you to obtain guidance from 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 Corporate Legal Department 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.

You are encouraged and expected 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 the Corporate Legal Department immediately.

Alternatively, you may report any matter on a confidential and, if you choose, anonymous basis, via our Helpline at www.ethicspoint.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 the Corporate Legal Department.

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”). 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 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 agents, consultants and business partners). 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 consultant or broker) 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.**

1. Who is considered a “government official”?

A “government official” generally refers to:

- (a) any officer or employee of a government, or any department, agency or instrumentality thereof (which includes government-owned or government-controlled state enterprises);
- (b) any person acting in an official capacity for such government or organization; or
- (c) 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.

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:

- Public international groups (e.g., World Health Organization)
- Issuers of government permits, approvals or licenses
- Airport authorities
- State-owned factories or other businesses
- Customs
- Immigration or tax officials or ministers
- Representatives of foreign governments (including royal parties)

2. What types of promotional 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 also 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 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;
- to be made in cash;
- as a stipend or for spending money;
- for souvenirs, unless they carry Charles River and/or the host’s logo and are of nominal value (e.g., shirts or tote bags);
- 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.

3. Are we allowed to exchange gifts and / or entertainment with government officials?

Before offering, giving or accepting a gift to or from a government official, you must take particular care to follow the policies and procedures outlined here.

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

A gift is anything of value, including cash, 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 instance:

- During a procurement/sales process: You may neither give nor receive a gift or business courtesy if you are involved in any stage of a formal procurement/sales process in which we are either a current or potential customer or business provider.
- Intended to influence or reward the recipient: Giving or accepting gifts to or from a government official that could influence or appear to influence the business judgment of the official is never appropriate and may incur criminal or civil penalties.

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

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

Representatives should offer or accept only entertainment that is appropriate, reasonable for promotional purposes, is offered or accepted in the normal course of an existing business relationship, and is an occasion where business is discussed. Employees should never offer entertainment as a means of influencing a government official's business decision. The appropriateness of a particular type of entertainment, of course, depends upon both the reasonableness of the expense and on the type of activity involved. Styles of entertainment 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 entertainment is appropriate, you should obtain prior approval from the Corporate Legal Department before accepting or offering entertainment to 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 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 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, or payments to accounts in countries other than where the agent is located or business is to be performed;
- Cash payments;
- Requests for unusually high commissions;
- History of corruption 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.

Also, 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 ethical standing of a consultant or broker we use or wish to use, consult with 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 lower-level government officials to secure their performance of ‘routine governmental actions.’ However, this Policy recognizes that the anti-

bribery laws in different jurisdictions have different positions on the legality of such “*facilitating*” payments. Accordingly, if the utilization of a facilitating payment is desired, and such payment is not otherwise in violation of this Policy, 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 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 his/her 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?

Political contributions are generally not prohibited if the purpose of the contribution does not relate to obtaining or retaining business. However, political contributions and activities warrant special attention because the purpose of such contributions and activities could be misconstrued as payments to obtain or retain business in a given country. Therefore, we will neither fund nor in any way give support to any political party or official or to any candidate for political office, even where permitted by law, unless such political contribution is approved in advance by **each** of the following:

- Our Chief Executive Officer;
- Our Chief Financial Officer; and
- Our General Counsel.

ARE WE REQUIRED TO KEEP ANY PARTICULAR RECORDS OR ACCOUNTS?

Anti-bribery laws generally 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. This means that 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 hospitality or gifts accepted or offered, which will 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 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 customs 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?

The U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") administers a program of embargoes and sanctions for political or national security reasons by the U.S. against a number of countries at the following website:

<http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx>). These embargoes/sanctions typically block the assets of, and prohibit transactions with, the embargoed country.

In addition, OFAC from time to time publishes a list of additional embargoed individuals and entities known as Specially Designated Nationals ("SDN"). Persons or entities on the SDN List may include 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 OFAC embargoes/sanctions includes the following countries: **Burma, Cuba, Iran, North Korea, Sudan and Syria**. 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 the Corporate Legal Department before doing business in a country which we do not presently do business.**

In the case of Cuba and North Korea, the U.S. embargo also applies to our subsidiaries and affiliates outside the U.S. In addition, the prohibitions against all of the embargoed countries and SDNs generally apply to any person subject to U.S. jurisdiction. This includes any person located in the U.S. and any U.S. citizen or U.S. resident alien, wherever located (including U.S. employees of foreign subsidiaries). The regulations generally prohibit such a person from 'approving' or 'facilitating' a transaction with an embargoed country or with a person or entity on the SDN List, as well as performing any contract in support of a commercial or governmental project in an embargoed country.

Therefore, any transaction with embargoed countries or SDNs by a non-U.S. subsidiary or affiliate must be reviewed in advance by the Corporate Legal Department. In addition, any Representative who is a “U.S. Person” must obtain clearance from our Corporate Legal Department before taking any action involving, either directly or indirectly, an embargoed country or an SDN. A general or specific license may be available under the regulations to authorize the activity. However, this fact must be determined by our Corporate Legal Department prior to engaging in the activity.

WHO IS SUBJECT TO THIS ANTI-BRIBERY POLICY, AND HOW WILL WE KNOW THEY ARE AWARE OF THIS POLICY?

Every Representative of Charles River, wherever located, is responsible for complying with this Policy and must report any suspected violations immediately to the Corporate Legal Department or through our Helpline. Every Representative whose duties are likely to lead to involvement in any of the areas covered by this Policy will be required periodically to certify their compliance with this Policy, as well as complete anti-bribery training. Similarly, all of our third parties (including agents, consultants and other business partners) who are likely to be involved in transactions on behalf of the Company in jurisdictions outside of the U.S. will be required to certify or assert to their compliance with the anti-bribery laws, including the FCPA and/or the Bribery Act and other related laws.

ARE WE PROTECTED FROM RETRIBUTION IF WE COMPLY WITH THIS POLICY?

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 general manager of your business unit 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 www.ethicspoint.com or via the Helpline telephone numbers set forth at the website for your respective country.**

HOW WILL THIS POLICY BE COMMUNICATED, AND HOW WILL TRAINING BE CONDUCTED?

Introduction to training on this Policy will be included as part of the “on-boarding” process for all new employees. Regular, periodic and relevant training on how to implement and adhere to this Policy will be provided to applicable employees.

Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

HOW WILL THIS POLICY BE MONITORED AND REVIEWED?

The Legal Compliance Department of the Corporate Legal Department 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 the Corporate Legal Department.

WHAT STEPS WILL THE COMPANY TAKE IN THE EVENT IT BECOMES AWARE OF A VIOLATION OF THIS POLICY?

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.

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/regulations, and promptly notify 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.

SCOPE

All employees, officers, directors, agents and representatives of the Company, whether full-time, part-time, temporary or permanent, wherever located.

DEFINITIONS

See above.

RESPONSIBILITIES

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

Our Corporate Legal Department has been tasked with implementing this Policy. The Legal Compliance Department has primary responsibility for overseeing its implementation, and for monitoring its use, effectiveness and dealing with any queries on its interpretation. However, ultimately, management at all levels is responsible for ensuring those reporting to them are made aware of and understand this Policy and are given adequate and regular training on it.

RELATED DOCUMENTS

None.