

PERKINELMER, INC. ANTICORRUPTION/ANTIBRIBERY POLICY

General Policy Statement: PerkinElmer, Inc. will not do business anywhere in the world through bribes or other corrupt payments or other illegal incentives to any third party to obtain or retain business or to obtain any other advantage for the Company.

PerkinElmer, Inc., (“PerkinElmer” or the “Company”), is committed to acting legally in every country in which the Company or any of its subsidiaries does business. Bribery is a crime in countries where we do business and companies and individuals who engage in bribery could face substantial penalties, including imprisonment, fines and denial of the right to conduct business. In the United States, the Foreign Corrupt Practices Act (“FCPA”) prohibits bribes and other corrupt payments to foreign government officials. The US government vigorously enforces the FCPA and penalizes violations. Most other countries have similar laws. Just as importantly, the Company values its reputation and the reputation of its employees and any association with corruption or bribery could damage our brand and reputation.

Anticorruption Guidelines

This policy applies to the Company, its subsidiaries worldwide, and all of their respective officers, directors and employees. This policy applies whether we are acting directly or indirectly through dealers, agents or other representatives.

The term “government official” is a broad one and includes: 1) any officer or employee of any government or any government department or agency (including such individuals who may be serving in other capacities such as an employee of a corporation who also holds a governmental post); 2) any person acting in an official capacity on behalf of any government or any government department or agency; 3) any officer or employee of a company or business owned in whole or in part by any government or government official; 4) any officer or employee of a public international organization such as the World Bank or the United Nations; 5) any political party or any official thereof; 6) any candidate for political office; 7) civil servants; and 8) military personnel. The spouses, children and close relatives of a government official are also included in the meaning of the term.

Any individual or company acting on behalf of the Company or its subsidiaries must follow these guidelines:

- We will not offer or give money or anything else of value to any person in order to obtain or retain their business or secure any other improper advantage, such as approval of a license or if to do so would violate local laws or would constitute a commercial bribe.

- We will not offer or provide money or anything else of value to any person, including a customer or government official, as an incentive or reward for that person's past, present or future willingness to do business with the Company or to provide a benefit to the Company that it is not otherwise legally entitled to receive without such payment.
- We will not retain the services of any person, including a government official, if to do so would violate local law.
- All payments and benefits to, and engagements of, any person, including government officials, customers, and healthcare professionals, must be properly documented and accurately recorded in the Company's books and records and must be for bona fide services actually required by the Company.
- The Company's employees must not accept anything of value from any third party, if doing so may compromise the employee's independence or judgment, or if it would constitute an inducement to make, or a reward for making, any decision in favor of a third party.
- We will not engage third parties such as agents, dealers, distributors or contractors to conduct business on our behalf or to represent us or our products or services whom we know or have reason to know conduct business in a corrupt manner. We will conduct reasonable due diligence to select partners that do not conduct business in a corrupt manner.
- We will thoroughly investigate potential or reported violations of this Policy. Every employee who suspects a violation is encouraged to report it to his/her manager, to his/her local HR or legal representative or to the Company's compliance hotline. All such reports will be appropriately investigated. Any violation by a Company employee will be the subject of appropriate discipline, which might include termination of employment in case of the most serious infractions.

Implementation

Each legal entity or local subsidiary office affiliated with the Company must adopt and maintain procedures locally that its employees must follow that are at least as strict as the following requirements but that, at minimum, comply with local laws on anticorruption and antibribery. It is the responsibility of senior management at each such legal entity or local subsidiary to ensure that such procedures are adopted and employees are trained on and comply with such requirements. Attached hereto is a sample procedure that may be adapted as appropriate.

1. Gifts, Entertainment and hospitality.

General guidelines in gifts, entertainment and hospitality are set forth in the Company's Standards of Business Conduct ("SOBC") which can be accessed on the portal at <http://connect.perkinelmer.com/services/hr/sobc/shared%20documents/2008%20sobc%20policies/english%20sobc%202008.pdf>. As a general matter, no gift, entertainment or hospitality is permitted if it is intended as an inducement to obtain or retain business or commercial benefits for the Company or its subsidiaries. Cash or cash equivalents (for example, gift certificates, gift cards, store credits, etc.) are always prohibited. Gifts, entertainment or hospitality provided by the Company to family members of any person who does or might do business with the

Company, e.g. any customer or prospective customer, or of any government official are to be avoided except in exceptional circumstances that should be approved in advance by the General Counsel.

In addition to the SOBC, each facility/legal entity shall adopt and implement procedures:

- a. Prohibiting any gifts, entertainment and hospitality that violate any applicable laws, including the laws of the local Company entity or the recipient's location;
- b. Prohibiting any gifts, entertainment and hospitality that are known to violate the recipient's internal policies, e.g. that are known to violate the recipient's company's code of conduct on receipt of gifts from vendors;
- c. Setting forth limits or guidelines, as appropriate, on the type and value of allowable gifts, entertainment and hospitality where such benefits are allowed;
- d. Establishing procedures for advance approval of any gifts, entertainment and hospitality;
- e. Requiring appropriate documentation of the value of such gifts, entertainment and hospitality before any reimbursement of such expenses is allowed.

2. Consulting Engagements or Other Service Agreements

The Company may engage third parties to provide legitimate services to the Company, where a bona fide business need exists for such an engagement. All such engagements shall be properly documented with legal documentation appropriate to the circumstances of the engagement. Such engagements are never permissible if they are intended as an inducement to obtain or retain business or commercial benefits for PerkinElmer. In every case in which the third party being engaged is a government official, a vendor or potential vendor, a customer or potential customer of the Company, or known to be a family member of any of them, such documentation must minimally include a complete description of the services and deliverables that will be provided by the third party and the amounts to be paid for such services or deliverables. Retainer agreements with government officials, vendors/potential vendors, or customers/potential customers, or with their known family members, are strongly discouraged and must be approved in advance by the Legal Department. No third party shall be engaged to provide "lobbying services" to the Company unless approved in advance by the General Counsel.

3. Charitable Donations

The Company believes in its social responsibility to the communities in which we operate, or in which our employees live and work. As such, we are committed to charitable giving as a means of improving human lives and communities. Some of our customers or prospective customers may legally qualify to receive charitable donations but the Company will not make any donation to a customer or prospective customer as an inducement to obtain or retain business. In some circumstances, even a donation to a bona fide charity recipient may be illegal if it is made to induce a public official to grant a benefit to the Company. All charitable donations must strictly comply with PerkinElmer's SOBC and Supplemental Code of Ethics.

4. Dealers, Distributors and Other Third Party Sales Channels

The Company will only do business with third parties who conduct their business using legal means and not using corrupt or illegal payments or business practices. Regulators and criminal enforcement agencies increasingly hold companies responsible if their sales partners, even independent third parties, use illegal or corrupt payments to obtain or retain business for the company's benefit. To facilitate compliance with the following, the Company has subscribed to Trace International, a non-profit organization that provides its member companies with valuable resources. Employees are encouraged to use the Trace resources and should contact their legal representative and/or the Office of Dealer Management for further information.

To minimize the risk of liability, the following guidelines must be followed:

- a) No third party may be engaged to represent our products without due diligence being conducted prior to the engagement. It is the responsibility of the business management who oversees the sales region to establish adequate processes for evaluating each such party prior to entering into any representation agreement with such third party. Third parties should be evaluated for their: 1) financial viability; 2) capacity to perform its obligations to the Company; 3) sound business and financial controls; and 4) commitment to ethical business practices. Once engaged, such third parties should be periodically evaluated for continued compliance in these areas.
- b) No payments or reimbursement of expenses may be made to any such third parties without adequate backup documentation justifying the payment in accordance with local and corporate accounting policies. Any such payments shall be consistent with the parties' agreement, with fair market value, and with the relevant documentation. For example, commissions should only be paid if earned, at rates consistent with the market and with other similar situations, and if right to the commission has been verified. In addition, reimbursement of marketing expenses incurred by a distributor may only be made if the expense is documented by receipts or other original verification of the expense.
- c) In managing the relationship with any third party sales channel partners, employees must investigate "red flags" that might indicate an illegal payment. Any red flags should be promptly reported to a member of the Legal Department. Such red flags include: requests for payment outside the partner's country of business; payments using unusual means (e.g. cash payments); payments to bank accounts in third countries; payments to parties other than the third party with whom the Company has contracted; requests for reimbursement of amounts that are extraordinarily high or not documented properly; requests for payment of lobbying or consulting fees in ordinary sales transactions; and any payment to a government official. Until such red flags are investigated and satisfactorily

resolved, the payment in question may not be made by the Company. The investigation into the red flag should be documented.

- d) In connection with M&A activities, due diligence must include a review of the acquisition target's corruption risk. Any "red flags" of corruption that are identified during due diligence should be promptly reported to a member of the Legal Department, must be fully investigated and resolved before the transaction may proceed. All such investigations should be documented.

5. Facilitating Payments

In some countries it is permissible and common for small payments to be made in order to process routine applications, permits, licenses, work orders and other items necessary to conduct business. For these situations, the FCPA allows a limited exception called "facilitating payments" which are *small* payments permitted by local law to expedite or secure the performance of routine services or actions that the Company is otherwise entitled to receive. To qualify as a facilitating payment, the payment must meet all of these criteria. Any payment that is prohibited by local law, or is paid where the official receiving it may exercise any discretion in providing the service or taking the action, or for any activity that is not routine does not qualify as a facilitating payment. The value of the facilitating payment must be nominal. Examples of facilitating payments include: customs clearance, immigration and work permits, and telephone and utility connection. Because the legality of facilitating payments is determined by local law, locally developed procedures under this policy should provide detail as to whether facilitating payments are permitted at all and if so, provide some specific examples of permitted facilitating payments within the jurisdiction.

Although they are permitted in very limited circumstances under US law, facilitating payments are not permitted by many other laws and, therefore, are strongly disfavored by the Company. As a general matter, the Company strongly discourages the making of facilitating payments to government officials. Facilitating payments are only permitted where there is a significant or pressing business need to secure a routine governmental action on an expedited basis, and if refraining from making the facilitating payment will directly result in delay or the inability of the Company to fulfill a pre-existing contractual obligation. Facilitating payments should not be used for convenience. All facilitating payments must be disclosed as such and properly recorded in the Company's books and records as facilitating payments.

Compliance, Reporting Violations and Penalties

Directors, officers and employees of the Company and its subsidiaries should report any conduct or any questionable payment that they believe in good faith might be a violation of this policy. Any such reports may be anonymous and may be directed to a supervisor, any member of senior management or via the Company's compliance hotline. Any such reports shall be treated as confidential to the extent allowed by law. The Company prohibits retaliation for good faith reports of suspected misconduct. Any questions concerning this Policy or the subject matter of this policy may be directed to the Legal Department.

Because a violation of anticorruption laws can result in such severe penalties and in potential lost business and damage to the Company’s reputation, all potential infractions will be thoroughly investigated. Employees who violate this policy will be subject of disciplinary action appropriate to the level of the violation, with the most serious violations potentially resulting in termination of employment and even possible legal sanctions. If appropriate, the Company will no longer do business with any third party who engages in business practices that are inconsistent with the law or with this policy.

Roles and Responsibilities

The following table outlines the roles and responsibilities of various functional and business areas for compliance with this policy:

Responsibility	Responsible Department or Function
Oversight of anticorruption program	CEO. Compliance Committee. Legal Department.
Compliance with financial reporting and documentation and creation, updating of related policies	Corporate Controller’s office.
Investigation of policy violations	Legal Department. Human Resources.
Audit of internal and third party compliance	Responsible functional areas including Internal Audit
Due diligence of third party partners	Legal Department and/or Dealer Management working with functional area responsible for the third party relationship
Contract documentation for third party engagements	Legal Department working with functional area responsible for the third party relationship.
Training on this policy	Legal Department. Human Resources.
Development of local procedures and local organizational support	Country Leadership.

**[Model] Local Procedure for Gifts, Hospitality,
Travel/Lodging and Payments to Government Officials**

[REGION]¹

I. GENERAL REQUIREMENTS

This Procedure for Gifts, Hospitality, Travel/Lodging and Payments to Government Officials provides the detailed steps required to provide gifts, hospitality (including entertainment), paying for or reimbursing travel and lodging expenses and making or reimbursing any other payments or expenses to or on behalf of government officials in connection with the Company's business activities in [REGION] and is issued pursuant to the PerkinElmer, Inc. Policy on Anti-Corruption and Antibribery.

For purposes of this Procedure, the term "hospitality" shall mean any event or form of entertainment, including meals (whether hosted at a Company facility or elsewhere) and social events (including sporting events, parties, golf outings, plays and receptions).

As a general principle, any gifts, hospitality, and payment or reimbursement for lodging or travel expenses extended by Company employees to government officials shall:

- Be reasonable and customary under the circumstances;
- Be consistent with local law and with local custom;
- Not be motivated by a desire to influence the government official inappropriately in the conduct of the official's duties but rather be given in good faith without corrupt intent, the expectation of reciprocity or a "quid pro quo";
- Be provided openly and transparently;
- Not be given to the same officials frequently so that it renders them unreasonable;
- In the case of gifts, be provided in connection with a recognized gift-giving event or holiday in the government official's home jurisdiction;
- In the case of hospitality, be provided in connection with a bona fide and legitimate Company business purpose and be tasteful and commensurate with generally accepted standards for professional courtesy in the United States.
- In the case of payment or reimbursement of lodging or travel expenses, the payment or reimbursement is directly related to either (i) the promotion, demonstration or explanation of Company products or services; or (ii) the execution or performance of a contract between Company and a foreign government (or any agency or instrumentality thereof, including a company or business owned by a foreign government) and the cost of travel and lodging is modest and not lavish.

¹ As described in the Policy, Local Country Leadership is responsible for developing, disseminating and training on a set of Procedures designed to capture local anti-corruption laws and guidelines.

II. PROCEDURE

A. Reporting; Reimbursement

All gifts and hospitality extended by Company employees to government officials and payment or reimbursement of travel or lodging expenses and any other payments made to or on behalf of government officials shall conform to PerkinElmer's accounting and any other policies regarding accurately recording of transactions in the [Company's] books and records, be accurately reflected in the books, records and accounts of the applicable Company business unit, and shall in all circumstances record the following in reasonable detail:

- The names and positions of the government officials;
- The names and positions of the Company employees involved;
- A description of the gifts or hospitality or of all costs associated with travel or lodging;
- The value of the gift or hospitality;
- In the case of travel expenses, a detailed description of the itinerary for the travel (including dates of travel, type of ground transportation, airline and class of ticket); and
- In the case of lodging, the dates of stay and name of lodging facility.

To the extent permitted by this Procedure, in the case of facilitating payments, the Company shall in all circumstances record the following in reasonable detail:

- The names and positions of the government official who received the facilitating payment;
- The names and positions of the Company employees involved in the facilitating payment;
- The amount of the facilitating payment in U.S. dollars (or US dollar equivalent in local currency); and
- A detailed description of the routine governmental action that the Facilitating Payment is intended to secure or expedite.

A permissible gift or hospitality may be expensed by an employee provided that the request for reimbursement of the gift or hospitality shall be consistent with this Procedure and fully documented as set forth herein and in other applicable expense reimbursement policies. Facilitating payments and payment or reimbursement of travel or lodging for a government official may not be processed as an expense reimbursement by an employee.

B. Prohibitions

- Under no circumstances shall Company employees give gifts to government officials in the form of cash, cash equivalents (for example, gift certificates, gift cards, or travelers checks) or securities.
- Under no circumstances shall cash per diems be provided to any government official to whom travel and lodging is provided hereunder.
- Under no circumstances shall the spouses, family members or guests of government officials be invited to or participate in any Company hospitality nor shall any travel or

lodging expenses for spouses, family members or guests be paid or reimbursed without the prior written approval of the Legal Department, regardless of value.

- Unless otherwise approved in accordance with [Company's] Policy on Business Travel, Company will not provide business class or first class travel to government officials.
- Even where lodging is permissible and approved hereunder, no payment or reimbursement shall be made for: (i) long distance telephone calls; (ii) mini-bar usage; (iii) room service; and (iv) television pay-per-view services.
- Company employees shall not use un-reimbursed personal expenditures to provide gifts, hospitality, travel or lodging to government officials. In other words, a Company employee shall not use his or her own personal funds to give a gift or provide hospitality or pay or reimburse the travel or lodging expenses for a government official if reimbursement by the Company would otherwise not be permitted under this Procedure.
- Any gift, hospitality, or payment or reimbursement of travel that is prohibited to be made directly by the Company hereunder may not be made by a third party on behalf of or using Company funds, with the [Company's] knowledge.

C. Valuing Gifts and Hospitality

All limits set forth herein are in U.S. dollars, but also apply to the US dollar equivalent in another currency.

In the case of gifts, the value of the gift for purposes of this Procedure shall be the greater of: (i) the actual cost to Company of the gift; or (ii) the fair market value (if any) of the gift.

In the case of hospitality, the value of hospitality shall be the total actual cost of the event, in U.S. dollar equivalent, divided by the number of participants or attendees reasonably expected to attend or that will be invited to the event.

The value of any gift or logo item given in connection with hospitality shall be included in the value of the hospitality for purposes of determining whether Legal Department approval is required for the hospitality. For example, if attendees at a hospitality event valued at \$70 per person will each receive a logo item worth \$35, then the hospitality will be valued at \$105.

D. Approval Process for Gifts and Hospitality

- a. Gifts and Hospitality Valued at US\$100 (or equivalent amount expressed in local currency) or more

Except as set forth in subsection II.D.c (Widely Attended Events), written approval from the Legal Department shall be required before providing any government official with any hospitality or gifts, including branded promotional or logo items, valued at US\$100 (or US dollar equivalent in local currency) or more. Such requests for approval shall be submitted to the Legal Department at least fourteen days prior to the date on which the gift is proposed to be conveyed or the hospitality is proposed to take place, and shall set forth the following in reasonable detail:

- The name and title of the government official(s) who will receive the gift or hospitality;

- The names and titles of the Company employees providing the gifts or attending the hospitality;
- The value of the gift or hospitality as calculated hereunder; and
- A description of the gift or hospitality.

Before submitting any request for approval of gifts or hospitality to the Legal Department, the employee requesting approval shall confirm that the proposed gift or hospitality is permissible under local law and conforms to custom in the country where the government official is based.

b. Gifts and Hospitality Valued at Less than US\$100

The provision of gifts and hospitality to government officials valued at less than US\$100 (or equivalent in local currency) shall not require prior review or approval by the Legal Department, provided that all of the following conditions are satisfied:

- The gift or hospitality is approved in writing by the site or functional unit leader.
- The Company employee proposing the gift or sponsoring the hospitality has confirmed that the proposed gift or hospitality is legal in the country in which the government official is based.

If the same government official receives gifts or hospitality valued at \$50 or less two times during a rolling twelve-month period, then any additional gifts and hospitality thereafter during the next twelve months shall require approval of the Legal Department in accordance with subsection A above.

c. Widely-Attended Events

Hospitality to a government official provided at or in conjunction with widely-attended events such as trade shows shall not require approval by the Legal Department, provided that all of the following conditions are satisfied:

- The widely-attended event in question has at least forty attendees and the hospitality will have at least fifteen attendees.
- The hospitality is approved in writing by the site leader or head of the applicable business unit.
- The per-attendee value of the hospitality as calculated hereunder is US\$50 (or equivalent in local currency) or less.
- The hospitality shall be fully documented
- The hospitality includes both government officials and non-government (non-Company) employees.
- The Company employee sponsoring the hospitality has confirmed that the proposed hospitality is legal in the country or countries in which the government official(s) attending is/are based.

E. Approval Process for Providing Travel or Lodging

Written approval from the Legal Department shall be required before paying or reimbursing the expenses for any government official's travel or lodging. Such requests for approval shall be submitted to the Legal Department at least fourteen days prior to the anticipated date on which travel shall commence or the lodging shall be provided, and shall set forth the following in reasonable detail:

- The name and title of the government official(s) traveling;
- The names and titles of the Company employees requesting the approval;

- A detailed description of the travel or lodging, including (i) itinerary; (ii) airline; (iii) ground transportation; (iv) hotel; (v) type of room; and (vi) a detailed and itemized breakdown of all costs;
- Written confirmation that the travel and lodging have been approved by the government official's supervisors or superiors;
- A detailed description of the business need for Company to provide the travel and lodging;
- A statement of whether the travel and lodging are provided pursuant to an express requirement in a written agreement between Company and a customer and if so, a copy of the agreement, and, if so, a statement of whether Company will charge the costs associated with the travel and lodging back to the customer, if any; and
- A statement of whether Company has previously provided travel and lodging to the government official identified in the request or to any other government official employed by the same foreign government.

Before submitting any request for approval of gifts or hospitality to the Legal Department, the employee requesting approval shall confirm that the proposed gift or hospitality is permissible under local law and conforms to custom in the country where the government official is based.

F. Facilitating Payments

All Facilitating Payments made by Company employees to government officials shall:

- Be made solely to secure or expedite the performance of a routine governmental action, which shall mean a governmental action, approval or requirement ordinarily and commonly performed by a government official where (i) the Company as a legal matter is entitled to the action in question; and (ii) the government official has no discretion as to whether or not to perform the action in question;
- Not be made to influence the award or retention of business to the Company or any of its affiliated companies;
- Be made solely when Company is clearly entitled to the performance of the routine governmental action in question;
- Be consistent with local law;
- Not be motivated by a desire to influence the government official inappropriately;
- Not be given to the same government official with a frequency that renders them unreasonable; and
- Be provided in connection with a bona fide and legitimate Company business purpose.

All facilitating payments of US\$100 (or US dollar equivalent in local currency) or more must be approved in advance in writing by the Legal Department. Facilitating payments of less than US\$100 (or US dollar equivalent in local currency) must be approved by the site leader or functional head of the relevant business unit. Requests for approval must be made in writing, at least 14 days prior to the anticipated payment date, and shall include the following information:

- The names and positions of the government official who received the facilitating payment;
- The names and positions of the Company employees involved in the facilitating payment;
- The exact amount of the facilitating payment in U.S. dollars (or equivalent in local currency); and
- A detailed description of the routine governmental action that the Facilitating Payment is intended to secure or expedite.

Employees shall not be required to obtain advance approval in the event that a facilitating payment is necessary to avoid bodily injury or other personal danger to a Company employee.

G. Other Payments to Government Officials

Other payments or reimbursements made to or on behalf of, or at the request of, a government official except those that are set forth above are prohibited unless approved in advance, in writing, by the General Counsel. Examples include:

- charitable donations made to a bona fide charitable organization in the name of or at the request of a government official;
- payment or reimbursement of tuition expenses for a government official or a family member;
- providing paid employment to a government official or a family member, at the request of the government official;
- commissions to a government official in connection with any business obtained by the Company; and
- payment of any amount to receive or expedite any action that involves the exercise of the government official's discretion or to obtain an action to which the Company is not already unequivocally entitled, such as the issuance of a permit or license that has not yet been approved.