

Supplemental Code of Ethics

PerkinElmer includes a Diagnostics Business Group that includes subsidiary companies that are engaged in the development, production, manufacture, and marketing of medical products, technologies and related services and therapies, including laboratory services, that are used to diagnose, treat, monitor, manage and alleviate health conditions and disabilities (“Medical Technologies”) in order to enable patients to live longer and healthier lives.

PerkinElmer recognizes the obligation to facilitate ethical interactions between itself and those individuals or entities, involved in the provision of health care products or services to patients, which purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe PerkinElmer’s Medical Technologies in the United States (“Health Care Professionals”).

Medical Technologies

Medical Technologies are often highly dependent upon “hands on” Health Care Professional interaction from beginning to end – unlike drugs and biologics, which act on the human body by pharmacological, immunological or metabolic means. For example, Medical Technologies may take the form of noninvasive reagents, instrumentation and/or software to aid in the diagnosis, monitoring and treatment decisions made by Health Care Professionals. In addition, Medical Technologies include laboratory services that may utilize reagents, instrumentation and/or software whether such laboratories have developed such Medical Technologies independently or, in some instances, have purchased the Medical Technologies that are used to render laboratory services. Some Medical Technologies work synergistically with other technologies, or are paired with other products that deploy devices in the safest and most effective manner. Many Medical Technologies require technical support during and after deployment.

Interactions with Health Care Professionals

The scope of beneficial interactions between Health Care Professionals and PerkinElmer is broad and includes interactions intended to:

- *Promote the Advancement of Medical Technologies.* Developing and improving cutting edge Medical Technologies are collaborative processes between PerkinElmer and Health Care Professionals. Innovation and creativity are essential to the development and evolution of Medical Technologies, which often occur outside PerkinElmer’s laboratory and research and development facilities.
- *Enhance the Safe and Effective Use of Medical Technologies.* The safe and effective use of sophisticated electronic, *in vitro* diagnostics or other Medical Technologies often requires PerkinElmer to provide Health Care Professionals appropriate instruction, education, training, service and technical support. Regulators often require this type of training as a condition of product approval.
- *Encourage Research and Education.* PerkinElmer’s support of *bona fide* medical research, education and enhancement of professional skills improves patient safety and increases access to Medical Technologies.

- *Foster Charitable Donations and Giving.* PerkinElmer makes monetary and Medical Technology donations for charitable purposes, such as supporting indigent care, as well as patient and public education. This increases access to – as well as the quality of – care and treatment in patient populations that may not otherwise be reached.

The Purpose of the Code of Ethics

PerkinElmer recognizes that Health Care Professionals’ first duty is to act in the best interests of patients. PerkinElmer can serve the interests of patients through beneficial collaborations with Health Care Professionals. To ensure that these collaborative relationships meet high ethical standards, they must be conducted with appropriate transparency and in compliance with applicable laws, regulations and government guidance. The obligation to facilitate ethical interactions between PerkinElmer and Health Care Professionals is required in order to ensure that medical decisions are based on the best interests of the patient. The ethical principles that govern these interactions are the subject of this Supplemental Code of Ethics. To that end, PerkinElmer restates and amends its Supplemental Code of Ethics and Frequently Asked Questions (collectively “SCoE”), effective December 31, 2009.

I. Code of Ethics Compliance

In adopting the SCoE, PerkinElmer is implementing a compliance program that includes policies and procedures that foster compliance with the SCoE with respect to their interactions with Health Care Professionals related to Medical Technologies.

PerkinElmer’s compliance program incorporates the following seven elements:

1. implementing written policies and procedures;
2. designating a Compliance Officer and Compliance Committee;
3. conducting effective training and education;
4. developing effective lines of communication (including an anonymous reporting function);
5. conducting internal monitoring and auditing;
6. enforcing standards through well-publicized disciplinary guidelines; and
7. responding promptly to detected problems and undertaking corrective action.

II. Company-Conducted Product Training and Education

PerkinElmer has a responsibility to make training and education on its products, services and Medical Technologies available to Health Care Professionals. PerkinElmer may also provide education to Health Care Professionals. “Training” means training on the safe and effective use of Medical Technologies. “Education” means communicating information directly concerning or associated with the use of PerkinElmer Medical Technologies, *e.g.*, information about fetal, maternal and child health and the benefits of Medical Technologies and services to such populations. Training and Education programs include, but are not limited to, “hands on” training sessions, lectures and presentations, and grand rounds. In fact, the U.S. Food and Drug Administration mandates training and education to facilitate the safe and effective use of certain

Medical Technologies. PerkinElmer adheres to the following principles when conducting training and education programs concerning Medical Technologies for Health Care Professionals:

- Programs and events should be conducted in settings that are conducive to the effective transmission of information. These may include clinical, educational, conference or other settings, such as hotels or other commercially available meeting facilities. In some cases, it may be appropriate for a PerkinElmer representative to provide training and education at the Health Care Professional's location.
- Programs providing "hands on" training on Medical Technologies should be held at training facilities, medical institutions, laboratories or other appropriate facilities. The training staff used by PerkinElmer should have the proper qualifications and expertise to conduct such training. Training staff may include qualified field sales employees or consultants who have the technical expertise necessary to perform the training. PerkinElmer may choose to subcontract training to appropriate third party providers. In limited circumstances, where a Health Care Professional requires training outside of the normal training schedule, PerkinElmer may authorize reimbursement of *ad hoc* training by an appropriately credentialed third party provider. In such instances, the training must be approved by the SCoE Committee prior to such reimbursement.
- PerkinElmer may provide Health Care Professional attendees with modest meals and refreshments in connection with these programs. Any such meals and refreshments should be modest in value and subordinate in time and focus to the training and/or educational purpose of the meeting.
- Where there are objective reasons to support the need for out-of-town travel to efficiently deliver Training and Education on Medical Technologies, PerkinElmer may pay for reasonable travel and modest lodging costs of the attending Health Care Professionals. It is not appropriate for PerkinElmer to pay for the meals, refreshments, travel or other expenses for guests of Health Care Professionals or for any other person who does not have a *bona fide* professional interest in the information being shared at the meeting.

III. Supporting Third-Party Educational Conferences

Bona fide independent, educational, scientific and policymaking conferences promote scientific knowledge, medical advancement and the delivery of effective health care, particularly in the fields of prenatal and newborn screening. These typically include conferences sponsored by national, regional or specialty medical and other research associations and conferences sponsored by accredited continuing medical and scientific education providers. PerkinElmer may support these conferences in various ways:

- *Conference Grants.* PerkinElmer may provide a grant to the conference sponsor to reduce conference costs. PerkinElmer may also provide grants to a training institution or the conference sponsor to allow attendance by medical students, residents, fellows, geneticists and nurses in training, masters level trainees and doctoral candidates, and others who are Health Care Professionals in training. PerkinElmer may provide grants when: (1) the gathering is primarily dedicated to promoting objective scientific and educational activities

and discourse; and (2) the training institution or the conference sponsor selects the attending Health Care Professionals who are in training. Such grants should be paid only to organizations with a genuine educational function and may be used to reimburse only the legitimate expenses for *bona fide* educational activities. Such grants also should be consistent with applicable standards established by the conference sponsor and any entity accrediting the educational activity. The conference sponsor should independently control and be responsible for the selection of program content, faculty, educational methods and materials.

- *Conference Meals and Refreshments.* PerkinElmer may provide funding to the conference sponsor to support the provision of meals and refreshments to conference attendees. Also, PerkinElmer itself may provide meals and refreshments for Health Care Professional attendees if such meals and refreshments are provided: (1) to all Health Care Professional attendees (with the limited exception noted below), and (2) in a manner that is consistent with applicable standards established by the conference sponsor and the body accrediting the educational activity. Meals and refreshments may be provided to fewer than all Health Care Professional attendees if PerkinElmer, as the provider of such meals and refreshments, satisfies all other principles related to meals set forth in Section VII. Any meals and refreshments should be modest in value, subordinate in time and focus to the purpose of the conference, and clearly separate from the continuing medical education portion of the conference.
- *Faculty Expenses.* PerkinElmer may make grants **to conference sponsors, but not to individual Health Care Professionals**, for reasonable honoraria, travel, lodging and modest meals for Health Care Professionals who are *bona fide* conference faculty members.
- *Advertisements and Demonstration.* PerkinElmer may purchase advertisements and lease booth space for PerkinElmer displays at conferences.

IV. Sales, Promotional, and Other Business Meetings

PerkinElmer may conduct sales, promotional and other business meetings with Health Care Professionals to discuss, for example, Medical Technology features, laboratory services, sales terms or contracts. Often, these meetings occur close to the Health Care Professional's place of business. It is appropriate to pay for reasonable travel costs of attendees when necessary (*e.g.*, for plant tours or demonstrations of non-portable equipment) and/or to provide occasional modest meals and refreshments in connection with such meetings. It is not appropriate to pay for meals, refreshments, travel or lodging of guests of Health Care Professionals or any other person who does not have a *bona fide* professional interest in the information being shared at the meeting. See Section VII for additional principles related to the provision of meals associated with Health Care Professional business interactions

V. Consulting Arrangements with Health Care Professionals

PerkinElmer engages Health Care Professionals to provide a wide range of valuable, *bona fide* consulting services through various types of arrangements, such as contracts for research, product

development, development and/or transfer of intellectual property, marketing, participation on advisory boards, presentations at Company-sponsored training and other services. PerkinElmer may pay consultants fair market value compensation for performing these types of services, provided that they are intended to fulfill a legitimate business need and do not constitute an unlawful inducement. PerkinElmer should comply with the following standards in connection with consulting arrangements with Health Care Professionals:

- Consulting agreements should be written and describe all services to be provided. When PerkinElmer contracts with a consultant to conduct clinical research services, there should also be a written research protocol.
- Consulting arrangements should be entered into only where a legitimate need for the services is identified in advance and documented.
- Selection of a consultant should be made on the basis of the consultant's qualifications and expertise to meet the defined need.
- Compensation paid to a consultant should be consistent with fair market value in an arm's length transaction for the services provided and should not be based on the volume or value of the consultant's past, present or anticipated business.
- PerkinElmer may pay for documented, reasonable and actual expenses incurred by a consultant that are necessary to carry out the consulting arrangement, such as costs for travel, modest meals, and lodging.
- The venue and circumstances for PerkinElmer meetings with consultants should be appropriate to the subject matter of the consultation. These meetings should be conducted in clinical, educational, conference or other settings, including hotel or other commercially available meeting facilities conducive to the effective exchange of information.
- PerkinElmer sponsored meals and refreshments provided in conjunction with a consultant meeting should be modest in value and should be subordinate in time and focus to the primary purpose of the meeting. PerkinElmer should not provide recreation or entertainment in conjunction with these meetings.
- PerkinElmer sales personnel may provide input about the suitability of a proposed consultant, but sales personnel should not control or unduly influence the decision to engage a particular Health Care Professional as a consultant. PerkinElmer has implemented appropriate policies and procedures to monitor compliance with this section.

Provisions on Payment of Royalties. Arrangements involving the payment of royalties to a Health Care Professional should meet the contractual standards set forth above. Health Care Professionals, acting individually or as part of a group in which they are an active participant, often make valuable contributions that improve products or Medical Technologies. They may develop intellectual property, for example, patents, trade secrets, or knowhow, under a product or technology development or intellectual property licensing agreement. PerkinElmer should enter into a royalty arrangement with a Health Care Professional only where the Health Care Professional is expected to make or has made a novel, significant or innovative contribution to, for example, the development of a product, technology, process or method. A significant contribution by an individual or group, if it is the basis for compensation, should be appropriately

documented.

The calculation of royalties payable to a Health Care Professional in exchange for intellectual property should be based on factors that preserve the objectivity of medical decision-making and avoid the potential for improper influence. For example, royalties paid in exchange for intellectual property should not be conditioned on: (1) a requirement that the Health Care Professional purchase, order or recommend any product or Medical Technology of the Company or any product or technology produced as a result of the development project; or (2) a requirement to market the product or Medical Technology upon commercialization. (PerkinElmer may, however, elect to enter into separate consulting agreements with Health Care Professionals for marketing services if such services meet the requirements set forth in this Section V above.) In such instances where royalties are paid to a Health Care Professional, PerkinElmer will exclude from the calculation of royalties, the number of units purchased, used or ordered by the Health Care Professional and/or members of the Health Care Professional's practice.

VI. Prohibition on Entertainment and Recreation

PerkinElmer interactions with Health Care Professionals should be professional in nature and should facilitate the exchange of medical or scientific information that will benefit patient care. To ensure the appropriate focus on an educational and/or informational exchange and to avoid the appearance of impropriety, PerkinElmer should not provide or pay for any entertainment or recreational event or activity for any Health Care Professional. Such activities include, for example, theater, sporting events, golf, skiing, hunting, sporting equipment, and leisure or vacation trips. Such entertainment or recreational events, activities or items should not be provided, regardless of: (1) their value; (2) whether PerkinElmer engages the Health Care Professional as a speaker or consultant; or (3) whether the entertainment or recreation is secondary to an educational purpose.

VII. Modest, Occasional Meals Associated with Health Care Professional Business Interactions

PerkinElmer's business interactions with Health Care Professionals may involve the presentation of scientific, educational or business information and include, but are not limited to, the different types of interactions described in Sections II through V of this Code of Ethics. Such exchanges may be productive and efficient when conducted in conjunction with meals. Accordingly, modest meals may be provided as an occasional business courtesy consistent with the limitations in this section.

Purpose. The meal should be incidental to the *bona fide* presentation of scientific, educational or business information and provided in a manner conducive to the presentation of such information. The meal should not be part of an entertainment or recreational event.

Setting and Location. Meals should be in a setting that is conducive to *bona fide* scientific, educational or business discussions. Meals may occur at the Health Care Professional's place of business. However, in some cases the place of business may be a patient care setting that is not available for, or conducive to, such scientific, educational or business discussions. In other cases,

it may be impractical or inappropriate to provide meals at the Health Care Professional's place of business, for example, (1) where the Medical Technology cannot easily be transported to the Health Care Professional's location, (2) when it is necessary to discuss confidential product development or improvement information, or (3) where a private space cannot be obtained onsite.

Participants. PerkinElmer may provide a meal only to Health Care Professionals who actually attend the meeting. PerkinElmer may not provide a meal for an entire office staff where everyone does not attend the meeting. PerkinElmer also may not provide a meal where its representative is not present (such as a "dine & dash" program). PerkinElmer may not pay for meals for guests of Health Care Professionals or for any other person who does not have a *bona fide* professional interest in the information being shared at the meeting.

Other principles. Depending on the type of business interaction or meeting, additional principles may apply, as described in other sections of this Code of Ethics. Specifically:

- Section II: Company-Conducted Product Training and Education
- Section III: Supporting Third-Party Educational Conferences.
- Section IV: Sales, Promotional, and Other Business Meetings
- Section V: Consulting Arrangements with Health Care Professionals.

VIII. Educational Items; Prohibition on Gifts

PerkinElmer occasionally may provide items to Health Care Professionals that benefit patients or serve a genuine educational function for Health Care Professionals. Other than medical textbooks or anatomical models used for educational purposes, any such item should have a fair market value of less than \$100. PerkinElmer may not provide items that are capable of use by the Health Care Professional (or his or her family members, office staff or friends) for non-educational or non-patient-related purposes, for example, a DVD player or MP3 player/iPod.

PerkinElmer may not give Health Care Professionals any type of non-educational branded promotional items, even if the item is of minimal value and related to the Health Care Professional's work or for the benefit of patients. For purposes of distributing non-educational branded promotional items in connection with neonatal screening conferences ONLY, Health Care Professionals shall not include personnel that are employed by state neonatal screening laboratories, except for Massachusetts. Examples of non-educational branded promotional items include pens, notepads, mugs and other items that have PerkinElmer's name, logo, or the name or logo of one of its Medical Technologies. PerkinElmer also may not provide any Health Care Professionals, including personnel that are employed by state neonatal screening laboratories, with gifts such as cookies, wine, flowers, chocolates, gift baskets, holiday gifts or cash or cash equivalents.

This section is not intended to address the legitimate practice of providing products for evaluation and demonstration purposes, which is addressed in Section XI.

IX. Provision of Coverage, Reimbursement and Health Economics Information

As Medical Technologies have become increasingly complex, so have payor coverage and reimbursement policies. Patient access to necessary Medical Technology may be dependent on Health Care Professionals and/or patients having timely and complete coverage, reimbursement and health economic information. Consequently, PerkinElmer may provide such information regarding its Medical Technologies if it is accurate and objective. PerkinElmer also may collaborate with Health Care Professionals, patients and organizations representing their interests, to achieve government and commercial payor coverage decisions, guidelines, policies and adequate reimbursement levels that allow patients to access its Medical Technologies.

Permissible activities involving the provision of coverage, reimbursement and health economic information may include, but are not limited to:

- Identifying the clinical value of PerkinElmer's Medical Technologies and the services and procedures in which they are used when providing coverage, reimbursement and health economics information and materials to Health Care Professionals, professional organizations, patient organizations and payors.
- Collaborating with Health Care Professionals, their professional organizations and patient groups to conduct joint advocacy on coverage, reimbursement and health economics issues; supporting Health Care Professionals and their professional organizations in developing materials and otherwise providing direct or indirect input into payor coverage and reimbursement policies.
- Promoting accurate Medicare/Medicaid and other payor claims by providing accurate and objective information and materials to Health Care Professionals regarding PerkinElmer Medical Technologies, including identifying coverage, codes and billing options that may apply to those Medical Technologies or the services and procedures in which they are used.
- Providing accurate and objective information about the economically efficient use of PerkinElmer's Medical Technologies, including where and how they can be used within the continuum of care.
- Providing information related to PerkinElmer's Medical Technologies regarding available reimbursement revenues and associated costs.
- Providing information relating to changes in coverage or reimbursement amounts, methodologies and policies and the effects of such changes in order to facilitate a Health Care Professional's decision to buy or use PerkinElmer's Medical Technologies.
- Providing accurate and objective information designed to offer technical or other support intended to aid in the appropriate and efficient use or installation of PerkinElmer's Medical Technologies.
- Facilitating patient access to PerkinElmer's Medical Technologies by providing Health Care Professionals with assistance in obtaining patient coverage decisions from payors. This assistance may include providing information and/or training on payor policies and procedures for obtaining prior authorization, and providing sample letters and information on medical necessity and appeals of denied claims. In addition, at the request of a Health

Care Professional to facilitate patient access to PerkinElmer's Medical Technology, and subject to appropriate privacy safeguards, PerkinElmer may assist the patient by facilitating the preparation and submission of requests for coverage determinations, prior authorizations, pre-certifications and appeals of denied claims relating to PerkinElmer's own Medical Technology; however, such assistance should not be provided as an unlawful inducement.

PerkinElmer may not interfere with a Health Care Professional's independent clinical decision-making or provide coverage, reimbursement and health economics support as an unlawful inducement. For example, PerkinElmer should not provide free services that eliminate an overhead or other expense that a Health Care Professional would otherwise of business prudence or necessity have incurred as part of its business operations if doing so would amount to an unlawful inducement. Further, PerkinElmer should not suggest mechanisms for billing for services that are not medically necessary, or for engaging in fraudulent practices to achieve inappropriate payment.

X. Research and Educational Grants and Charitable Donations

PerkinElmer may provide research and educational grants and charitable donations. However, PerkinElmer may not provide such grants or donations as an unlawful inducement. Therefore, PerkinElmer should: (a) adopt objective criteria for providing such grants and donations that do not take into account the volume or value of purchases made by, or anticipated from, the recipient; (b) implement appropriate procedures to ensure that such grants and donations are not used as an unlawful inducement; and (c) ensure that all such grants and donations are appropriately documented. PerkinElmer's sales personnel may provide input about the suitability of a proposed grant or charitable donation recipient or program, but sales personnel should not control or unduly influence the decision of whether a particular Health Care Professional or institution will receive a grant or donation or the amount of such grant or donation. PerkinElmer has implemented procedures to monitor compliance with this section.

a. Research Grants

Research provides valuable scientific and clinical information, improves clinical care, leads to promising new treatments, promotes improved delivery of health care and otherwise benefits patients. In furtherance of these objectives, PerkinElmer may provide research grants to support independent medical research with scientific merit. Such activities should have well-defined objectives and milestones and may not be linked directly or indirectly to the purchase of Medical Technologies.

PerkinElmer-initiated or directed research involving PerkinElmer's Medical Technologies (such as clinical study agreements) is addressed separately in Section V.

b. Educational Grants

Educational grants may be provided for legitimate purposes, including, but not limited to, the examples below. As noted in Section III, PerkinElmer may make educational grants to conference sponsors or training institutions. PerkinElmer may not make educational grants to

individual Health Care Professionals.

- *Advancement of Medical Education.* PerkinElmer may make grants to support the genuine medical education of medical students, residents and fellows, geneticists and nurses in training, masters level trainees and doctoral candidates and others who are Health Care Professionals in training participating in fellowship or internship programs that are charitable or have an academic affiliation, or other medical personnel. (For additional considerations regarding educational grants, see Section III.) All educational grants must be approved by the SCoE Committee.
- *Public Education.* PerkinElmer may make grants for the purpose of supporting education of patients or the public about important health care topics. All educational grants must be approved by the SCoE Committee.

c. Charitable Donations

PerkinElmer may make monetary or Medical Technology donations for charitable purposes, such as supporting indigent care, patient education, public education or the sponsorship of events where the proceeds are intended for charitable purposes. Donations should be motivated by *bona fide* charitable purposes and should be made only to *bona fide* charitable organizations or, in rare instances, to individuals engaged in genuine charitable activities for the support of a *bona fide* charitable mission. PerkinElmer should exercise diligence to ensure the *bona fide* nature of the charitable organization or charitable mission. All charitable donations are made at the corporate level and must be approved by the Trustees of the PerkinElmer Foundation.

XI. Evaluation and Demonstration Products

Providing products to Health Care Professionals at no charge for evaluation or demonstration purposes can benefit patients in many ways. These benefits include improving patient care, facilitating the safe and effective use of products, improving patient awareness and educating Health Care Professionals regarding the use of products. Under certain circumstances described below, PerkinElmer may provide reasonable quantities of products to Health Care Professionals at no charge for evaluation and demonstration purposes.

This section is limited to providing evaluation and demonstration products only and is not intended to address any other arrangement.

PerkinElmer products that may be provided to Health Care Professionals for evaluation include single use (*e.g.*, consumable or disposable products) and multiple use products (sometimes referred to as “capital equipment”). These products may be provided at no charge to allow Health Care Professionals to assess the appropriate use and functionality of the product and determine whether and when to use, order, purchase or recommend the product in the future. PerkinElmer products provided for evaluation are typically expected to be used in patient care.

Single Use/Consumables/Disposables. The number of single use products provided at no charge should not exceed the amount reasonably necessary for the adequate evaluation of the products

under the circumstances.

Multiple Use/Capital. Multiple use products provided without compensation for evaluation purposes should be furnished only for a period of time that is reasonable under the circumstances to allow an adequate evaluation. The terms of an evaluation of such multiple use products should be set in advance in writing. PerkinElmer should retain title to such multiple use products during the evaluation period and should have a process in place for promptly removing such multiple use products from the Health Care Professional's location at the conclusion of the evaluation period unless the Health Care Professional purchases or leases the products.

Demonstration. PerkinElmer demonstration products are used for Health Care Professional and patient awareness, education and training. Demonstration products typically are not intended to be used in patient care. Demonstration products also are typically identified as not intended for patient use by suitable designation on the product, the product packaging and/or documentation that accompanies the product.

PerkinElmer should provide Health Care Professionals with documentation and disclosure regarding the no-charge status of evaluation and demonstration products.