

# **PerkinElmer Standards of Business Conduct**

## ***PERKINELMER'S ETHICAL AND BUSINESS VALUES***

### **Purpose**

The PerkinElmer Standards of Business Conduct (“Standards”) identify the values and principles that guide our business relationships. We do business and work together with a strong sense of ethics. PerkinElmer is committed to honesty, integrity and fairness in everything we do, so our activities reflect positively on our stockholders, the marketplace we serve, the community, and ourselves. These principles are not new at PerkinElmer. They are simply the restatements of our long-standing policy that all business conducted by PerkinElmer employees and representatives will be conducted ethically and in compliance with all applicable laws.

Ethical decision-making requires an understanding of personal and PerkinElmer values and principles coupled with good personal judgment. You play the most important role in the ethical decision-making process and, therefore, in the implementation of the ethical standards of PerkinElmer.

### **Applicability**

These Standards apply to all directors, officers and employees of PerkinElmer and its subsidiaries, except where compliance with these Standards would violate a law.

### **Roles of Managers and Individual Employees**

PerkinElmer managers are responsible for discussing these Standards with all employees in their organization and for ensuring that its provisions are understood and observed. Each manager is responsible for practicing diligent supervision to ensure the ethical and legal business behavior of those employees for whom the manager has operational responsibility. Each employee also has direct personal responsibility for following the provisions of these Standards and for taking the initiative to seek help or clarification to avoid unethical or illegal business decisions.

When in doubt about an ethical issue, it helps to ask yourself:

- \* If this action were known, would it damage PerkinElmer’s reputation or that of any individual, including myself?

- \* Would I be embarrassed if others knew I had taken this action?
- \* If the situation were reversed, how would I feel as the recipient of this action?
- \* Is there an alternative action that does not pose an ethical conflict?
- \* Should I talk with someone in authority at PerkinElmer before I take this action?

**Your manager can be your first source of counsel on ethical matters. Alternatively, you may also report any ethical or compliance concern by telephone or electronic mail to the PerkinElmer Ethics Hotline or directly to any of the company officials listed at the end of this document. For more details, see “Reporting Procedures” at the end of these Standards.**

## ***PERKINELMER’S RELATIONSHIPS***

### **You and PerkinElmer**

As a PerkinElmer employee, you will be viewed as a reflection of the Company. This will be true during nonworking hours as well as working hours. You are expected to be loyal and faithful to the Company’s principles of honesty, integrity and fairness and the duties of your job, and to behave in an ethical manner that does credit to yourself and the Company.

### **Relations with and between Employees**

PerkinElmer is firmly committed to equal opportunity without regard to age, gender, race, religion, color, sexual orientation, national origin, disability or other protected status. We respect the differences in backgrounds, experiences and perspectives that individuals bring with them to PerkinElmer. We are interested in employing people of integrity whom we believe will be superior performers.

We expect all employees to accept and respect each other as equals, with an attitude of cooperation, courtesy, and consideration. No individuals or groups are to be considered “second class.” PerkinElmer will not tolerate conduct by any employee that harasses, disrupts, or interferes with another’s work performance or which creates an intimidating, offensive, abusive, or hostile work environment.

PerkinElmer is dedicated to maintaining a work environment that is safe and compliant with laws regulating workplace safety and health. You should always follow the established safety, environmental, and health rules, and you should feel that proper precautions for health and safety in all occupations are made by yourself and by the Company. Report immediately to the appropriate management any incident or injury sustained on the job, or any environmental, health or safety concern you may have. Appropriate and timely action will be taken to correct unsafe conditions.

For the sake of safety, quality, and consideration of other employees, all workplaces throughout the Company will be free of alcohol and illegal drugs. No work shall be performed nor any machine operated by anyone under the influence of such substances. Similarly, violent acts or threats of violence will not be tolerated.

Your manager's principal job is to make it possible for you to do your job in a superior and efficient way, for you to perform in a manner that produces superior products and services that deliver customer satisfaction. If you find that circumstances beyond your control make it impossible for you to perform in this manner, talk to your manager at the earliest opportunity so he or she can take corrective action.

### **Relations with Customers**

PerkinElmer is proud of the strong and reputable relationship we have built with our customers as we work with them to meet their changing needs. These relationships are key to our success and building such successful ties has taken time. Our goal is to supply superior products, services, and follow-on support at appropriate prices. We will prosper only if we anticipate our customers' changing requirements and are prepared to respond to and meet those needs.

We will comply with the laws and regulations that govern the acquisition of goods and services by our customers. We will compete fairly and ethically for all business opportunities. If we are involved in proposals, bid preparations, or contract negotiations, all statements, communications and representations to prospective customers must be complete, accurate and truthful. Once awarded, all contracts must be performed in compliance with applicable contract specifications and requirements.

Quality and integrity of our products and services are also of prime concern. Our customers buy from PerkinElmer because we provide superior quality products and services. Superior means that our products and services perform better than others available in the marketplace and that we treat our customers fairly, with honesty and respect. Quality is built into our products, starting with the concept and design, through manufacturing engineering, production, and testing. Quality is the responsibility of each of us who handles the product or performs a service throughout the life cycle of the product or service. You should bring to management's attention any lapse in quality control or testing and inspection procedures.

### **Relations with Vendors**

Vendors who provide quality components and services are an important part of PerkinElmer's ability to create superior products and services for our customers. We expect our vendors to be people of integrity who produce components of excellent quality, with timely deliveries, and at competitive prices. PerkinElmer will always employ the highest ethical business practices in source selection, negotiation, and

administration of all purchasing activities. We will respect and safeguard the proprietary information and trade secrets of our vendors.

### **Relations with Competitors**

Relations with competitors are always a delicate subject. The issue of antitrust law is always present and is discussed in further detail in these Standards. We are naturally interested in any information concerning our competitors that can be obtained through public sources or other sources that respect the personal privacy and proprietary interests of the competitors. We will observe accepted standards of fair conduct and legality when obtaining this information.

We will compete on the basis of the price and performance of our products or services, our service, support, and warranties, and our timeliness and responsiveness.

### **Relations with the Community**

We hope to provide the communities where we live and work with capable people who will help with leadership tasks within the community. To the extent that these outside tasks suit your interests and do not interfere with your job performance, we encourage you to undertake them.

For any outside task that involves a significant amount of time during normal working hours, prior approval must be obtained from your manager. Be certain that you understand the demands of any outside task, and that you and your manager feel there will be no impairment of your ability to perform your PerkinElmer duties in a superior manner if you proceed with the task in or out of normal working hours.

## ***COMPLIANCE WITH LAWS AND REGULATIONS***

### **General**

We conduct our business in accordance with all applicable laws and regulations. Each one of us is personally responsible for meeting this obligation. Managers must ensure that employees know what the law requires and understand the importance of conforming their conduct to the law. Compliance with the law does not comprise our entire ethical responsibility; it is a minimum, absolutely essential condition for performance of our duties. If you have any questions on specific laws or regulations, you should contact the PerkinElmer Legal Department.

## Antitrust

We comply fully with the antitrust laws that apply to our operations throughout the world. The underlying principle behind these laws is clear: a person who purchases goods in the marketplace should be able to select from a variety of products at competitive prices unrestricted by artificial restraints among competitors, such as, for example, price fixing, customer allocations, agreements to restrain output, illegal monopolies and cartels, boycotts, and tie-ins. We believe in these principles of free and competitive enterprise and are firmly committed to them.

Antitrust and competition laws are very technical and vary from country to country. The brief summary of the law below is intended to help employees recognize situations that may have antitrust implications so they can consult the PerkinElmer Legal Department.

Discussion of any of the following subjects with competitors, whether relating to PerkinElmer's or the competitors' products, is prohibited: past, present, or future prices, pricing policies, lease rates, bids, discounts, promotions, profits, costs, terms or conditions of sale, royalties, warranties, choice of customers, territorial markets, production capacities or plans, and inventories.

Competitive prices should be obtained only from legitimate sources other than competitors, such as published lists and our customers.

If, at any trade association meeting, you become aware of any formal or informal discussion among competitors regarding, for example:

- prices
- discounts
- customer allocations
- agreements to restrain output
- exclusion of members
- terms and conditions of sale
- refusal to admit members or to deal with a customer
- standardization among members of terms, warranties, or product specifications

you should immediately leave the meeting, and bring the matter to the attention of the PerkinElmer Legal Department. The restrictions on discussing product specifications would not apply to recognized standard setting organizations that set standards other than for the purpose of excluding market participants.

Consult with the PerkinElmer Legal Department and appropriate senior sales management before creating or terminating a relationship with, or refusing to sell to, a dealer, distributor, customer, or prospective customer. While PerkinElmer is free to

select its own customers, terminations and refusals to sell could lead to real or claimed antitrust violations.

Distributors and dealers may resell PerkinElmer products at prices they independently establish, and may handle competitive merchandise. You may not come to any understanding or agreement with a distributor or dealer that would establish the price the distributor or dealer must charge its customers. Limits on a distributor's territory or classes of customers must be reviewed with the PerkinElmer Legal Department prior to implementation.

It is against PerkinElmer policy to make our purchases from a supplier dependent on the supplier's agreement to buy from us.

Mergers, acquisitions and joint ventures may be restricted or prohibited by the antitrust laws in some circumstances. Since complex legal and economic factors may bear on the assessment of these activities, every such transaction must be reviewed in advance with the PerkinElmer Legal Department.

### **Foreign Corrupt Practices Act**

The Foreign Corrupt Practices Act prohibits PerkinElmer from offering or paying any money or other thing of value, directly or indirectly, to any foreign government official, foreign political party or its officials, or candidate for public office, for the purpose of improperly obtaining or maintaining business or influencing governmental action favorable to PerkinElmer. Such prohibited payments include consulting, broker's, finder's or other fees paid to third parties where there is reason to believe that any part of such fees will be distributed to, or for the benefit of, foreign officials or political parties for those improper objectives.

These prohibitions do not bar reasonable and bona fide expenditures to provide meals or travel to foreign officials, as long as those expenditures are made for the purpose of introducing relevant government employees to PerkinElmer products, services or information, and are legal within that country. In addition, facilitating payments or tips of nominal value to low level foreign government employees are acceptable where it is the custom or practice in that country to expedite the performance of routine ministerial duties. In no event shall they be offered where the purpose is to obtain favored treatment or special benefits to which PerkinElmer is not entitled. You must properly record the purpose of any of these expenditures and consult with the PerkinElmer Legal Department before making any such payment.

### **Import/Export Laws**

As an international company, PerkinElmer must be concerned with the laws and regulations affecting import and export activities.

U.S. law prohibits U.S. companies (and their controlled foreign subsidiaries) from complying with international economic boycotts against nations friendly to the U.S. and from providing information concerning business relationships with boycotted countries. PerkinElmer must report any direct or indirect request to participate in an unsanctioned boycott or for prohibited boycott-related information to the U.S. Department of Commerce. If the terms of any transaction refer to such a boycott, you should seek appropriate advice from the PerkinElmer Legal Department.

PerkinElmer products and technical information are subject to export control laws and regulations. U.S. laws prohibit some transfers outright, and these restrictions at times apply to the sale of PerkinElmer products. PerkinElmer products must not be directly or indirectly exported for any use prohibited in the country of destination. In addition, PerkinElmer products must not be directly or indirectly exported, either from the U.S. or from any other country, to “embargoed” countries where sales are prohibited by U.S. law. Countries currently on the embargoed list are Cuba, Iran, North Korea, Sudan and Syria. In addition, international transfers of certain PerkinElmer products and technical information may require license approval under U.S. laws and regulations and from the governments of other countries. Such transfers are subject to strict terms and conditions under the law. Access by foreign nationals – whether overseas or working in our facilities – to certain information may be deemed to be an “export” and also prohibited. If a foreign national would have access, then the manager must check first to ensure he or she is eligible for access.

Import/export laws change frequently and can be quite complex. If you are involved in the international sale of PerkinElmer products, make certain that all sales are properly authorized and that all transactions are fully and accurately documented. If you have questions regarding restrictions on international sales, license requirements, what might constitute an “export” or any other import/export-related issue, contact the PerkinElmer Legal Department.

### **Securities and Insider Trading**

In the course of your employment with PerkinElmer you may become aware of information about PerkinElmer or other companies (for example, suppliers, vendors or subcontractors) that is not known to the public. The use of or trading on any such material non-public or “inside” information about PerkinElmer or another company for your financial or other benefit is a violation of law and of PerkinElmer’s policies. U.S. law makes it unlawful for any person who has “material” non-public information about a company to trade the stock or other securities of that company or to disclose such information to others who may trade.

Material inside information is information that is not available to the general public and that reasonably can be expected to affect the market value of a corporation’s securities or to influence investor decisions. Such information may include non-public information about financial performance including earnings and dividend actions; acquisitions or other business combinations; divestitures; major new product announcements; significant

litigation; and other significant activities. Either positive or negative information may be material.

In addition to obeying the laws on insider trading, you must also comply with PerkinElmer's Securities Trading Policy, which is more restrictive. For example, you may not engage in "short" sales of PerkinElmer stock (sales of PerkinElmer stock that you do not own), unless as part of a permitted "cashless" exercise of stock options, and you may not trade in options, warrants, puts, calls or any form of derivative security or instrument linked to PerkinElmer stock.

If you are a PerkinElmer director, officer or designated "restricted" employee, you are also subject to additional restrictions set forth in PerkinElmer's Securities Trading Policy. For example, this Policy restricts your ability during certain periods to buy PerkinElmer stock, sell stock acquired pursuant to stock option exercises, or engage in "cashless" stock option exercises. Also, this Policy requires you to obtain advance approval from PerkinElmer's General Counsel before trading in PerkinElmer stock.

### **Environmental, Safety and Health**

PerkinElmer is committed to protecting the environment and the health and safety of its employees, their families, their communities and the public. PerkinElmer establishes and maintains sound environmental, safety and health management practices to accomplish this goal and to assure compliance with the laws, regulations, and orders of the responsible governmental authorities wherever PerkinElmer and its subsidiaries operate. Every manager is responsible for helping to achieve these goals and to ensure that PerkinElmer operates in compliance with law and PerkinElmer policy. The Environmental Safety and Health group within PerkinElmer's Legal Department provides consultation, education, oversight and audit worldwide. Each PerkinElmer employee is responsible to act with an awareness of environmental, safety and health requirements and sound judgment. If you know of a situation that creates a hazard or potential hazard or a violation of law, no matter how minor, report the matter immediately to your manager or the Environmental Safety and Health group within PerkinElmer's Legal Department.

### **Political Activities**

PerkinElmer encourages all employees to vote and be active in the political process. However, various laws regulate the use of corporate funds and resources in connection with elections. Political contributions by or in the name of PerkinElmer are prohibited. "Political contributions" include direct or indirect payments in support of candidates for elected office, elected officials or political parties. In addition to cash payments, political contributions are also deemed to include work performed by PerkinElmer employees during paid working hours, use of PerkinElmer facilities or equipment, the purchase of tickets to fund-raising events, and payment for advertisements, printing or other campaign expenses. In certain circumstances, where a candidate may compensate PerkinElmer or is not running for federal office, exceptions may apply.

This policy applies solely to the use of PerkinElmer assets and is not intended to discourage or prevent individual employees from making political contributions or engaging in political activities on their own behalf, so long as such contributions or activities are not linked in any way to PerkinElmer. No employee may be reimbursed directly or indirectly by PerkinElmer for personal political contributions.

If you are considering using PerkinElmer corporate assets or if you have any questions about what is or what is not proper, you must contact the PerkinElmer Legal Department before taking action.

## ***CONFLICTS OF INTEREST***

### **General**

PerkinElmer expects you to work loyally and faithfully during your assigned working hours for PerkinElmer and to avoid any conflict of interest, which is prohibited. A conflict of interest occurs when your private interest interferes in any way, or appears to interfere, with the interests of the corporation as a whole. For example, you should avoid any relationship, influence, outside interest or activity that might impair your ability to make objective and fair decisions when performing your job, or might lead others to believe that your decisions were not objective. You must also avoid any situation in which you or a member of your family receives improper personal benefits as a result of your position in PerkinElmer. At no time should you undertake any activity or investment which raises any question of conflict of interest between that activity or investment and your assigned job at PerkinElmer.

Any time a conflict appears, or you believe that such conflict might develop, you should fully disclose the matter to the General Counsel of PerkinElmer or the General Counsel's designee, to determine if a conflict of interest exists, and if so, can your employment duties be structured such that the conflict or even the appearance of a conflict does not interfere with your job performance, or is a waiver from the conflict of interest needed. The General Counsel, in collaboration with other members of senior management and Internal Audit, shall evaluate the information provided, the conflict of interest presented and such other facts and circumstances as deemed appropriate in order to make a determination that is consistent with the Standards. The General Counsel shall then inform the employee and the employee's supervisor, as well as the Chief Executive Officer, of the determination that has been made. Note that a conflict of interest situation involving an executive officer or director will be handled in accordance with the "Investigation Procedures" section of the Standards.

Conflict of interest situations may arise in many ways. Some examples include the following:

- any financial interest (other than small amounts of stocks or bonds in publicly traded companies) in any supplier, vendor, service provider,

distributor or dealer, customer or competitor

- any consulting, contract or employment relationship with any customer, supplier, vendor, service provider, distributor or dealer, or competitor
- any outside business activity which is competitive with PerkinElmer, or is materially impacted by the business activities of PerkinElmer
- the receipt of gifts, gratuities or entertainment of other than modest value from any company with which we have business dealings
- any loans by PerkinElmer to, or guarantees of obligations of, any family member of any executive officer or director
- any outside activity of any type which calls into question your ability to devote appropriate time and attention to your job responsibilities with PerkinElmer
- service on the board of directors of any for-profit company, unless such board service has been approved in advance by PerkinElmer's Chief Executive Officer
- being in the position of supervising, reviewing, or having any influence on the job evaluation, pay, or benefits of any close relative or person with whom you have a close personal relationship, within PerkinElmer
- being in the position of placing or influencing the placement of business of PerkinElmer with a firm in which you or your family has an ownership interest or a significant role in management.

### **Family Members**

Anything that presents a conflict for you would probably also present a conflict if it relates to a member of your family or someone with whom you have a close personal relationship. Neither you nor any member of your family should have a personal interest in any business you deal with as part of your job assignment at PerkinElmer, unless either the interest is very small (such as ownership of less than 1% of the common stock of a public company) or you obtain a waiver of the conflict of interest from the General Counsel of PerkinElmer or the General Counsel's designee or, in the case of any executive officer or director, from the Board of Directors.

### **Corporate Opportunities**

Each PerkinElmer employee and director owes a duty to the company to advance its legitimate interests when the opportunity to do so arises. You must not take advantage of an opportunity that you learned of in the course of your employment with PerkinElmer to the detriment of the present or prospective business interests of PerkinElmer, such as by acquiring property that PerkinElmer may be interested in. You must not compete with PerkinElmer.

### **Outside Employment**

From time to time, opportunities may present themselves to PerkinElmer employees for some part-time employment or consultation outside of PerkinElmer. PerkinElmer has no objection to such activities so long as they do not interfere with your productivity or job performance during your assigned working hours, and so long as they do not interfere or appear to interfere with your judgment or ability to act in the best interest of PerkinElmer, or otherwise represent a conflict of interest. To avoid any misunderstanding, we recommend that you obtain your manager's approval before beginning any part-time employment or consulting activity. Also, remember that you are required at all times to protect PerkinElmer's proprietary and confidential information and its intellectual property, as further described below.

### **Bribes, Gifts and Entertainment**

PerkinElmer employees may not give or accept any gift that might, or that might appear to, improperly influence a business relationship or decision. Gifts can range from widely distributed promotional novelties of nominal value, which you may give or accept, to bribes, which you unquestionably may not give or accept. No gift or entertainment should be given to any U.S. federal government employee, regardless of your intent or the appearance of the interaction, unless you have checked first with the PerkinElmer Legal Department. (See also "Relationships with Government Employees" below.) Giving or receiving inappropriate gifts or unauthorized payments clouds objectivity, compromises business relationships and may be illegal.

### **Business Amenities**

In commercial business, the exchange of customary business amenities, such as meals and entertainment, between suppliers, customers and PerkinElmer employees is acceptable when reasonably based on a clear business purpose and when the expenses involved are kept at a modest and reasonable level, are not prohibited by law or known customer business practice. It is the personal responsibility of each employee to ensure that the acceptance of such meals or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment.

### **Receiving Gifts**

Neither you nor any member of your family may solicit or accept from a supplier, customer, or other person with whom the Company has a business relationship, money or

a gift that could influence or could reasonably give the appearance of influencing PerkinElmer's business relationship with that supplier or customer. You may accept a gift of nominal value, such as a promotional novelty that is customarily offered to others having a similar relationship with the customer or supplier. If you are offered a gift that has more than nominal value or that is not customarily offered to others, or money, you must tell your manager immediately. Appropriate arrangements will be made to return or dispose of what has been received, and the supplier or customer will be reminded of PerkinElmer's gift policy.

### **Giving Gifts**

You may not give money or any gift to any supplier, customer or any other organization if doing so would influence or could reasonably give the appearance of influencing the organization's relationship with PerkinElmer. You may, however, provide a gift of nominal value, such as a PerkinElmer promotional novelty, if it is not prohibited by law.

### **Relationships with Government Employees**

PerkinElmer will adhere to all laws, rules and regulations pertaining to government employee gratuities in all localities and countries where PerkinElmer operates. Acceptable practices in the commercial business environment may be entirely unacceptable, and may even violate certain laws and regulations, when we are dealing with government employees or those who act on a government's behalf. Therefore, you must be aware of, and adhere to, the relevant laws and regulations governing relations between government customers and suppliers.

You must not give gifts, payments or services to any government official, employee or designee without first consulting the PerkinElmer Legal Department. See "Bribes, Gifts and Entertainment" above. Giving money or items of value to a foreign official or candidate for political office for the purpose of influencing a foreign government is prohibited. See "Foreign Corrupt Practices Act" above. U.S. law also prohibits the giving of "kickbacks," that is, the offer or acceptance of anything of value to any U.S. or foreign government employee or an employee of a higher-tier contractor to the U.S. or any foreign government for the purpose of obtaining favorable treatment in connection with a government contract.

You may not make prohibited payments, even if the failure to pay puts PerkinElmer at a competitive disadvantage or even if you are operating in a country where bribes or gifts to government officials are customary. If you are unsure whether an expected payment is legal and proper, always seek advice from PerkinElmer's Legal Department.

## ***PROTECTION OF PERKINELMER'S ASSETS***

### **General**

You are responsible for protecting PerkinElmer's assets, including its physical assets such as facilities, equipment and inventory, and intangible assets such as patents, copyrights and trade secrets. This requires that you safeguard any Company-owned equipment assigned to you or any supplier or customer-owned equipment entrusted to PerkinElmer. Use and maintain these assets with the utmost care and respect, guarding against waste, abuse, theft and carelessness. Be cost-conscious and alert to opportunities for improving performance while reducing costs. PerkinElmer assets may only be used for legitimate business purposes. Use of PerkinElmer property, facilities, equipment, and information for non-PerkinElmer purposes is permitted only with the approval of managers having authority to permit such usage. You are responsible for complying with requirements of software copyright licenses used in fulfilling job requirements and for ensuring that unauthorized copies of licensed computer software are not made.

### **Accuracy of Books and Records and Public Reports**

Employees, officers and directors must honestly, accurately and completely report all business transactions. You are responsible for the completeness and accuracy of your records and reports. Accurate and complete information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations, standards and PerkinElmer accounting and financial policies, and must accurately reflect the true nature of the transactions they record. This is mandatory, regardless of whether these records would disclose disappointing results or a failure to meet anticipated profit levels. Any attempt to mask actual operating results by inaccurately reflecting revenues, expenses, assets or liabilities cannot and will not be tolerated. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

Many of you are asked to record the time spent each day on each job on which you worked. This record is vitally important. It is to be a true and honest record of the hours you spent on each job. In addition to being records of your attendance and hours worked for the purpose of computing your pay, time records are often the basis for billing our customers. Falsifying records is fraudulent, and can lead to civil or criminal liability. Business expenses should be documented with receipts, as required by Company regulations and only legitimate business expenses shall be included in your expense reports. You are responsible for the accuracy of your individual records and reports. If

you have problems with your time recordkeeping system, please consult with your manager immediately.

### **Dealings with Independent Auditors**

No employee, officer or director shall, either directly or indirectly, knowingly make any materially false or misleading statement or omit to state any material fact to an accountant in connection with any audit, review or examination of PerkinElmer's financial statements or the preparation or filing of any document or report with the SEC. In addition, no employee, officer or director shall, either directly or indirectly, take any action to coerce, manipulate, mislead or fraudulently influence any independent public or certified public accountant engaged in the performance of an audit or review of PerkinElmer's financial statements.

### **Employee Privacy**

PerkinElmer respects your privacy. Personnel and medical records, salary, fringe benefits, and terms of employment are considered confidential and access to such information is restricted. Personal information is normally released to outside parties only with employee approval, except that PerkinElmer and authorized individuals may also release personal information to verify employment, to satisfy the legitimate requirements of a company or other entity which is acquiring some of PerkinElmer's business operations, or for appropriate investigatory, business or legal reasons.

Personal items, messages or information that you consider private should not be placed or kept anywhere in the PerkinElmer workplace, such as in telephone systems, computer systems, desks or offices. PerkinElmer management has the right to access these areas and any other PerkinElmer facilities. Employees, however, should not access another employee's workspace, including electronic files, without prior approval from management.

### **Proprietary Information**

PerkinElmer safeguards its proprietary and other confidential information and trade secrets, and you are responsible for protecting these assets. They are Company property not to be disclosed or given away to people outside the Company even after leaving PerkinElmer employment.

“Proprietary and other confidential information” includes such things as: PerkinElmer's technical or scientific information relating to current and future products, services or research; business or marketing plans or projections; earnings and other financial data; information about customers or vendors; and customer or vendor-supplied information.

To avoid inadvertent disclosure, you should never discuss with any unauthorized person information that PerkinElmer considers confidential or which PerkinElmer has not made public. Furthermore, you should not discuss such information even with authorized

PerkinElmer employees if you are in the presence of others who are not authorized. You should also not discuss such information with family members or with friends, who might innocently or unintentionally pass the information on to someone else.

Proprietary information received from customers and suppliers must also be protected. If you have come to PerkinElmer from another company, we would expect you to have this same consideration for the trade secrets of your former employer. PerkinElmer respects your former employer and its trade secret rights. We expect you to disclose nothing that borders on a proprietary product or process for the same reasons that we expect you to help keep PerkinElmer rights exclusive. If there are any restraints on your activity as a result of prior employment, these should be disclosed in writing to your manager prior to the beginning of your employment with PerkinElmer.

Never provide confidential information about PerkinElmer to any outside party or accept such information from anyone unless PerkinElmer has a binding confidentiality agreement with that party. When you have knowledge of confidential information belonging to PerkinElmer or another company, you must keep it confidential. It should not be disclosed even to PerkinElmer personnel, unless authorized under the agreement and unless disclosure is necessary for the purposes of the agreement.

### **PerkinElmer Intellectual Property Rights**

One of the things employees are paid for is to be thoughtful about their jobs; to wonder and to think about how to provide products with better quality, longer life, or lower costs. Some employees are specifically assigned to develop new products or new methods. Occasionally, some new products, methods, or ideas for improvement will be patentable.

When you joined PerkinElmer, you were required to sign an agreement under which you, as an employee of PerkinElmer, assumed specific obligations relating to intellectual property as well as the treatment of confidential information. Among other things in the agreement, you assign to PerkinElmer all of your right, title, and interest in intellectual property you develop when you are employed in certain capacities. The intellectual property you assign includes such things as ideas, inventions, computer programs and documents which relate to PerkinElmer's business, research or development or that are suggested by, or result from, work on tasks you perform for, or on behalf of, PerkinElmer. That intellectual property must be reported to PerkinElmer, and the property must be protected like any other proprietary information of PerkinElmer. All patent applications relating to that intellectual property should be filed by or with the approval of the PerkinElmer Legal Department. If, however, you believe that your idea, invention or computer program neither falls within the area of PerkinElmer's actual or anticipated business interests, nor resulted from nor was suggested by, any of your work assignments at PerkinElmer, you should discuss it with the PerkinElmer Legal Department.

### ***TRANSACTIONS WITH U.S. GOVERNMENT***

## **General**

Good business ethics, quality products and integrity in meeting commitments are important to both government and commercial businesses. However, suppliers to government agencies have additional requirements not usually found in standard commercial transactions. It is PerkinElmer's policy to comply with all applicable U.S. laws, regulations and contract provisions. Some areas requiring particular attention follow.

## **Costs**

In commercial transactions it is not usually required that the costs associated with a product or service be justified to the customer either before the price is negotiated or after the transaction is completed. However, in negotiated government business, fixed price or otherwise, the government usually has the right to audit the estimates used in determining the proposed price as well as the costs incurred in the performance of the contract. Additionally, certain restrictions are placed on costs allowed for government contracts that are not placed on normal commercial transactions.

Only allowable costs properly chargeable to a contract may be billed to or reimbursed by the U.S. Government, and only the portion of the cost that relates specifically to the government work involved can be submitted. Examples of improper charging of costs include false or incorrect data in the following categories: subcontractor charges, classification of costs between direct and indirect categories, expense account submission, and charging of time and materials. Note that proper allocation of costs is as important as avoidance of over-billing. Also, our information must only be submitted if properly protected from inappropriate disclosure by a government agency or a higher tier contractor.

## **Proposals and Cost or Pricing Data**

In addition to the general requirement that data submitted to the U.S. Government not be false or misleading, there are specific requirements relating to the submission and disclosure of cost or pricing data in support of contract proposals and negotiations. PerkinElmer employees involved, directly or indirectly, in preparing a proposal must take adequate precautions to ensure that cost or pricing data are current, accurate and complete, are properly disclosed to government representatives, and are retained for an appropriate time. There are also extensive restrictions in all federal procurements regarding possession, attempts to obtain, and disclosure of government source selection information and company proprietary information. Government information may be obtained only as authorized for release by the government agency involved.

## **Product Integrity**

Deviation from applicable contract specifications involving products, components, materials, testing, or other deviation, without prior written government authorization, is prohibited.

### **Relations with Government Employees**

Each agency of the U.S. Government has regulations prohibiting agency personnel from accepting entertainment, gifts, gratuities, payments or other business courtesies that may be acceptable in the commercial sector, *even if of only nominal value*. The letter and intent of such regulations must be understood and complied with by PerkinElmer and its employees.

### **Employment of Former Government Employees and Offers of Employment to Current Government Employees**

All applicable rules and regulations covering employment by PerkinElmer of former government employees must be followed to avoid any possible conflict of interest. These rules may prohibit the employment of or limit the duties assigned to and performed by these persons. In the case of certain current government procurement officials, PerkinElmer may not even discuss employment or business opportunities with them during certain periods, such as when they are considering or have power to influence a decision which could affect PerkinElmer. It is the responsibility of those PerkinElmer employees responsible for hiring to understand and follow regulations pertaining to the hiring of current or former government employees.

All restraints on job assignment or activities on behalf of PerkinElmer, which are imposed as a result of prior employment in the government or elsewhere, should be disclosed in writing prior to employment. It is the responsibility of a job candidate to disclose this relationship to PerkinElmer and to be quite certain that no tasks are undertaken for PerkinElmer that would be in conflict with government regulations. PerkinElmer will not assign such tasks knowingly.

### **Government Security Information**

Each of us who has access to government-classified information is committed to safeguarding the security of that information.

This means that the work can be discussed only with persons having the appropriate government security clearances and a clear, bona fide need to discuss the work. You must abide by security procedures to protect against disallowed access to other data, such as that which is electronically stored and intranet accessible or that which is stored in physical form. Violation of the security regulations is a serious offense. Your manager will describe the security procedures and policies to be followed at your location. Please consult with your manager if, at any time, you are confused about security regulations, or about whether or not you may discuss your work with someone.

Although most classified information received by PerkinElmer is from the U.S. Government or its contractors, these responsibilities cover classified information entrusted to PerkinElmer by all governments and their contractors. We must also carefully respect the strict rules of the government regarding those who may properly have access to, and possession of, copies of classified or other defense-sensitive data.

### ***INVESTOR RELATIONS AND CORPORATE COMMUNICATIONS***

PerkinElmer is a publicly traded corporation and the securities laws regulate communications with PerkinElmer stockholders. Communications from any stockholder or investment advisor requesting information relating to PerkinElmer should be forwarded to PerkinElmer's Investor Relations Department for proper handling. Any employee asked for any statement from any member of the media should likewise refer the request to PerkinElmer's Corporate Communications Department. It is the policy of PerkinElmer not to comment on or respond to inquiries or rumors concerning a prospective corporate development or transaction until such time as a formal public announcement has been made.

### ***ENFORCEMENT OF STANDARDS OF BUSINESS CONDUCT***

As a director, officer or employee of PerkinElmer, you have an obligation to PerkinElmer to report conduct that you, in good faith, believe to be a violation of laws, regulations, these Standards, or PerkinElmer policies, including any accounting and auditing matters. Those reports may be made anonymously.

You will not be subject to reprisal for reporting, in good faith, information that you believe violates the law, regulations or these Standards. PerkinElmer will not discipline, discriminate against or retaliate against any employee who reports a complaint or concern, unless it is determined that the report was made with knowledge that it was false.

We are all accountable for our business conduct and risk losing our jobs if we fail, even in the first instance, to obey the laws that apply to our business and live up to the Standards expressed in this document. The fact that our competition may behave differently is not an excuse for failing to meet the level of business conduct required of PerkinElmer employees. We do not compromise these responsibilities in order to meet financial plans or maximize profits.

## Reporting Procedures

PerkinElmer encourages employees to discuss with their managers questions concerning the interpretation and application of these Standards and to report to their manager any suspected violations. Each PerkinElmer manager has a special responsibility to create and maintain a work environment that encourages ethical behavior and open communication regarding ethical issues and concerns. You are invited to discuss all questions or concerns freely with any PerkinElmer manager.

If, however, you are not comfortable going to your manager or if your questions or concerns are not handled satisfactorily by your manager, you may instead:

- Contact your local Human Resources or Finance leader.
- Contact directly one of the resources referred to in this document or the individuals and departments listed at the back of this document.
- Call and leave a message on the PerkinElmer telephone Ethics Hotline:

United States: 866-723-0561  
Outside of the United States: (+1) 781-663-6905

This call is free in the United States, but is a toll call outside the United States.

- Send a message by electronic mail to [ethics.hotline@perkinelmer.com](mailto:ethics.hotline@perkinelmer.com).

Both the Hotline and the electronic mailbox are monitored by PerkinElmer's Legal Department and access to information submitted is strictly limited to those with a need to know the information.

If the reported violation involves a member of PerkinElmer's Legal Department or you otherwise want to make a report to someone outside the Legal Department, you may contact the Vice President – Internal Audit at the telephone number listed at the end of this document. If you believe an alleged violation of law, regulations or these Standards involves an officer or director of the corporation or is otherwise sufficiently serious to merit attention by the Board of Directors, you may pursue any of the reporting channels outlined above or you may contact the Lead Director of PerkinElmer's Board of Directors by sending the information to Lead Director, c/o Office of the General Counsel, 940 Winter Street, Waltham, MA 02451.

You may provide information anonymously if you choose. Please be aware, however, that it is often more difficult to investigate fully issues that are raised anonymously and you may not learn the outcome of the investigation.

In implementing its reporting procedures, PerkinElmer strives to comply with foreign laws, including without limitation data protection legislation of the European Union and its member States.

## Investigation Procedures

If PerkinElmer receives information regarding an alleged violation of law, regulation or these Standards, the General Counsel (or her designee) shall, as appropriate, in collaboration with other members of senior management and Internal Audit: (a) evaluate such information, (b) if the alleged violation involves an executive officer or a director, inform the Chief Executive Officer and Board of Directors of the alleged violation, (c) determine whether it is necessary to conduct an informal inquiry or a formal investigation and, if so, initiate such inquiry or investigation and (d) have the results of any such inquiry or investigation, together with a recommendation as to disposition of the matter, be reported to the Chief Executive Officer, or if the alleged violation involves an executive officer or a director, report the results of any such inquiry or investigation to the Board of Directors or a committee thereof. Employees, officers and directors are expected to cooperate fully with any inquiry or investigation by PerkinElmer regarding an alleged violation of the Standards. Failure to cooperate with any such inquiry or investigation may result in disciplinary action, up to and including discharge.

PerkinElmer shall determine whether violations of the Standards have occurred and, if so, shall determine the disciplinary measures to be taken against any employee who has violated the Standards. In the event that the alleged violation involves an executive officer or a director, the Board of Directors shall determine whether a violation of the Standards has occurred and, if so, the disciplinary measures to be taken against such executive officer or director. Please remember that a person who reports an alleged violation of law, regulations or these Standards, even if that report is not anonymous, may not be told whether or not the investigation is ongoing or completed, or the results of the investigation.

Failure to comply with the Standards may result in disciplinary action, including, but not limited to, reprimands, warnings, probation or suspension without pay, demotions, reductions in salary, discharge and restitution. Certain violations of the Standards may require PerkinElmer to refer the matter to the appropriate governmental or regulatory authorities for investigation or prosecution. Moreover, any supervisor who directs or approves of any conduct in violation of the Standards, or who has knowledge of such conduct and does not immediately report it, also will be subject to disciplinary action, up to and including discharge.

## **Exceptions and Waivers**

While some of the policies contained in these Standards must be strictly adhered to and no exceptions can be allowed, in other cases exceptions may be appropriate. For waivers of conflicts of interest, the procedures described above in “Conflicts of Interest” should be followed. Any employee who believes that an exception to any of these policies, other than those pertaining to conflicts of interest, is appropriate in his or her case should first contact his or her immediate supervisor. If the supervisor agrees that an exception is appropriate, the prior written approval of the General Counsel must be obtained. The

General Counsel shall be responsible for maintaining a record of all requests for exceptions to any of these policies and the disposition of such requests.

Any executive officer or director who seeks an exception to any of these policies should contact the General Counsel. Any waiver of these Standards for executive officers or directors or any change to these Standards that applies to executive officers or directors may be made only by the Board of Directors of PerkinElmer and will be disclosed as required by law or stock market regulation.

### ***DISSEMINATION AND AMENDMENT***

The Standards will be translated into multiple languages and will be available to PerkinElmer employees on the PerkinElmer intranet website. Information concerning how to access or obtain a copy of the Standards will also be provided to each new employee, officer and director of PerkinElmer upon commencement of his or her employment or other relationship with PerkinElmer. The Standards will also be publicly available through the external PerkinElmer website at [www.perkinelmer.com](http://www.perkinelmer.com).

PerkinElmer reserves the right to amend, alter or terminate the Standards at any time for any reason. This document is not an employment contract between PerkinElmer and any of its employees, officers or directors.

### ***FOR MORE INFORMATION***

*For additional guidance, the following PerkinElmer resources are also available to you.*

Chief Executive Officer:	781-663-5595
Chief Financial Officer:	781-663-5654
General Counsel:	781-663-5775
Regulatory Affairs:	781-663-5777
Controller & Chief Accounting Officer:	781-663-5661
Internal Audit:	781-663-5665
Corporate Communications:	781-663-5701
Investor Relations:	781-663-5659
Human Resources:	781-663-5700