

# POL-CORP-CODE OF CONDUCT

This Code of Conduct describes CRL's commitment to lawful and ethical conduct in all of its affairs. Each employee has an obligation to observe the Code of Conduct. We must remember that our actions are subject to scrutiny by a number of people, including customers and vendors, who are entitled to be associated with an ethical and law-abiding company. This policy can not cover all situations where legal or ethical issues may arise; however, the spirit of the code extends beyond what is listed in this policy.

If this policy does not provide information you need to make informed legal or ethical decisions, your first source for more information should be your immediate supervisor. Your next source of help can be your Vice President or Human Resources.

### **Conflicts of Interest**

All employees are expected to conduct their activities with CRL's best interests in mind. CRL recognizes and respects the right of employees to take part in business and other activities outside their jobs. However, these external activities must not place an employee in an actual or apparent conflict with his/her responsibilities to CRL. A conflict of interest can arise under many circumstances, and generally occurs when any interest or activity outside of CRL is allowed to influence your judgment with acting on behalf of CRL, compete against CRL in any business activity, and divert business from CRL or misuse company resources or information.

# Relationships with customers and vendors

CRL buys many goods and services from others. The selection of services or goods should be based solely upon legitimate criteria such as price, quality, service and need. Employees involved in the selection/purchase of goods and services should avoid situations that could interfere, or appear to interfere, with their ability to make free and independent decisions regarding purchases/services on behalf of CRL. CRL's purchase of goods and services from vendors must be free from any appearance that favorable treatment was sought, received or given, whether in the form of gifts, favors, entertainment, services or other gratuities. Under no circumstance should an employee solicit any form of gifts, favors, entertainment, services or other gratuities from customers, suppliers or vendors.

# Gifts, favors, entertainment and payments given/received by CRL employees

There may be instances where you are offered or given a gift or gratuity from a third party or may want to give a gift or gratuity to an outside party while working at CRL. The following criteria apply:

- Items with advertisement markings and of nominal value are acceptable, such as calendars, pens, notepads, etc.
- Unsolicited gifts above nominal value must be turned into your Vice President to be used for company drawings or events
- Gifts of perishable items such as fruit baskets, chocolates, popcorn, etc. should be taken to a break area for all employees to share



Items must not violate applicable law and generally accepted ethical standards

## **Questionable or Improper Payments**

CRL prohibits bribes, kickbacks or other improper payments, whether made directly or indirectly. Similarly, acceptance of bribes or kickbacks in any form for any purpose is prohibited.

# **Accuracy of Records and Books**

Accurate information is essential to CRL's ability to meet legal and regulatory requirements. You are responsible for the accuracy of your records and reports. You must honestly and accurately report all business transactions.

### **Ethical behavior**

All employees are expected to conduct themselves in accordance with the highest standards of business integrity. This requires the practice of honesty and integrity in every aspect of dealing with other employees, customers, the business community, government entities and vendors. All management and staff must conduct their work free from any undue commercial, financial, or other pressures and influences (from within CRL or outside CRL) that may adversely affect the quality of their work.

An employee's conduct under this policy is a key indication of the individual's judgment and competence. Accordingly, compliance with this code of conduct constitutes an important element in the evaluation of the employee for position assignments and promotion. Conversely, violation of the principles or spirit of this code of conduct will be grounds for disciplinary action.