

InVitro International Code of Ethics and Business Conduct

Our Vision

To dramatically limit or even eliminate the destruction of animals for the sake of product and/or environmental safety testing purposes.

and Mission

To advance the establishment and adoption of in-vitro science, through the development and promotion of faster, simpler more cost effective methods for product and environmental safety testing purposes.

Core Values and Guiding Principles

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. We strive to be judged on our actions and not on what we say alone. All employee efforts are directed toward doing the right thing perpetually

Respect for the Individual

We believe in an environment where everyone is treated with dignity and respect. InVitro International is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We strive to not let anyone's talents go to waste.

InVitro International is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Create and Maintain a Culture of Honest Communication

At InVitro International everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

In Vitro International will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, the company's executive leadership does operate with an open-door policy.

Uphold the Law

InVitro International's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. We are all responsible for preventing violations of law and for speaking up if we see possible violations. We seek regulatory approval and acceptance for our technologies, wherever possible, to accelerate the global acceptance of invitro testing.

Fair Business Practices

We are dedicated to ethical, fair and vigorous competition. We will sell our products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit bribes or kickbacks in connection with the purchase of goods or services.

Proprietary Information

We respect the property rights of others and will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to the company, its securities, business operations, plans, financial condition, results of operations or any development plan.

Health and Safety

InVitro International is dedicated to maintaining a healthy environment. A safety manual is available to all employees. Health programs are encouraged for each employee and InVitro will support same in every way possible.

Avoid Conflict of Interest

Any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs should be avoided. At times, we may be faced with situations where the business actions we take on behalf of the company may conflict with our own personal or family interests. We owe a duty to InVitro International to advance its legitimate interests when the opportunity to do so arises. We must never use company property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with the company.

Set Metrics and Report results Accurately

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, especially to all financial and senior executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with InVitro International's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of company books, records, processes or internal controls.

Do the Right Thing