



**Certification of President and CEO Pursuant to Plea Agreement Paragraph 13(h) Related to the Fiscal Year dated October 1, 2024 through September 30, 2025**

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I, Robert Leasure, Jr., President and CEO of Inotiv, Inc. (“Inotiv”), make this certification to the United States and the United States Probation Office as required by Section 13(h) of the Plea Agreement entered into on June 3, 2024, in the matter of *U.S. v. Envigo RMS, LLC et al.*, No. 6:24-cr-0016 (W.D. Va.).

Specifically, Section 13(h) of the Plea Agreement requires that “Inotiv Inc.’s President and CEO shall certify under oath to the United States and to the United States Probation Office . . . to the best of their knowledge after a diligent inquiry,” that “(1) the INOTIV ENTITIES fully complied with all Applicable Laws in the preceding year, or in the alternative, (2) the INOTIV ENTITIES fully complied with all Applicable Laws in the preceding year, with the exception of attached detailed non-compliant activity and the steps taken to remedy such non-compliant activity.”<sup>1</sup>

Subsection 5(c)(1) of the Plea Agreement defines the “Applicable Laws” as “all federal Animal Welfare Act and Clean Water Act laws, rules, and regulations, as well as all federal and applicable state and local animal welfare, animal cruelty, water, and sewage laws, rules and regulations[.]”

Based on this requirement, I hereby certify to the best of my knowledge after diligent inquiry that the Inotiv Entities fully complied with all Applicable Laws from October 1, 2024 through September 30, 2025, except as identified in Appendix A hereto, along with information on the steps taken to remedy these instances of non-complaint activity.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28<sup>th</sup> day of November, 2025 at \_\_\_\_\_.

Signed: \_\_\_\_\_

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<sup>1</sup> Inotiv is separately obligated under Section 13(i) of the Plea Agreement to, within 60 days of “receiving notice of a potential or actual violation of the Applicable Laws, any federal criminal law, or a term of the Plea Agreement at any of the INOTIV ENTITIES” notify the Compliance Monitor, the United States, and the United States Probation Office of such violation, the Company’s findings, and any corrective action taken.

## **APPENDIX A:<sup>2</sup>**

1. On February 25, 2025, Inotiv received a shipment of non-human primates (“NHPs”) at Inotiv’s facility in Denver, Pennsylvania. Upon arrival, the NHPs were promptly moved to animal enclosures in a holding room at the site. Shortly thereafter, facility staff found one of the newly arrived NHPs deceased and caught by the support bar in the squeeze back in the enclosure. The staff member immediately contacted the Attending Veterinarian (“AV”) who unsuccessfully attempted to resuscitate the animal. The same day, the incident was reported to the Institutional Official (“IO”) and the Chair of the Institutional Animal Care and Use Committee (“IACUC”). Subsequent investigation examined the enclosure that housed the NHP. The enclosure was manufactured by a third party specifically for use with NHPs and, as designed, includes a two-inch gap between the squeeze back bar and the top of the enclosure. The investigation determined that the NHP, due to its relative small size, was able to place its head into this gap, and its head became lodged resulting in strangulation. The enclosure that housed the deceased NHP was inspected for damage or deficiencies that could have contributed to the event, but none were found, and the enclosure and the squeeze back bar were confirmed to be working properly. While Inotiv has used this enclosure design for several years without any issues related to the two-inch gap between the squeeze back bar and top of the enclosure, Inotiv is limiting use of this style cage to larger animals and will continue monitoring the enclosure to ensure this issue does not recur.
2. While in interstate transit from Indiana on March 16, 2025, the container wall of the primary enclosure housing twelve hamsters experienced a physical breach. During an animal welfare check, the damage to the enclosure was noted and the enclosure was reinforced to close the container wall. The employees transporting the shipment observed the hamsters through the enclosure’s view port and believed all hamsters remained in the enclosure. Upon arrival at the destination facility, it was further determined that the animals in the enclosure were in good condition; however, because the biosecurity of the enclosure had been compromised, the decision was made to donate the hamsters to an approved donation facility. During unboxing for donation, the employees transporting the shipment determined that only ten of the twelve hamsters remained in the enclosure. These ten hamsters were donated to the approved donation center, which also confirmed their health prior to accepting the donation. The two hamsters that did not remain in the enclosure were located in the transportation vehicle. One hamster was deceased. The other hamster was humanely euthanized after observation from veterinary staff and consistent with IACUC and American Veterinary Medical Association guidelines. Inotiv’s investigation of this incident found that the employees transporting the shipment failed to activate the air suspension in the transportation vehicle resulting in additional upward force on the containers that the air suspension would have mitigated. The employees transporting the animals were dismissed for failing to follow procedures related to the use of the system.
3. During a routine USDA inspection of the Fort Collins, Colorado site on May 28, 2025, the USDA cited Inotiv for administering a premedication orally instead of intramuscularly as

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<sup>2</sup> Inotiv previously disclosed each of the incidents identified in Appendix A to the Compliance Monitor, the United States, and the United States Probation Office pursuant to Section 13(i) of the Plea Agreement.

required by protocol approved by the IACUC. Specifically, a technician inadvertently gave a rabbit a premedication dose of dexmedetomidine, ketamine, and buprenorphine (“DKB”) orally. The technician immediately identified this error and, to address it, notified a veterinarian. The veterinarian performed a robust medical assessment of the animal and consulted reference materials regarding the pharmacological effects of administering DKB orally. The veterinarian noted that the rabbit spit out a large amount of the oral DKB and observed the rabbit for any sedation effects. The veterinarian concluded that the oral administration of DKB was likely to have a negligible impact on the animal. After observing the rabbit for thirty minutes with no signs of sedation, the veterinarian recalculated the premedication dose and administered a lower dose of DKB intramuscularly. The facility investigated this incident and took appropriate corrective action to mitigate the risk of reoccurrence, including providing additional training to the technician. A copy of the USDA’s September 26, 2025 Inspection Report has been available on Inotiv’s public webpage.

4. During a routine comprehensive compliance investigation by the Texas Commission on Environmental Quality (“TCEQ”) of Envigo Global Services Inc.’s “Alice East” facility located in Alice, Texas, the TCEQ identified four alleged violations of applicable requirements for public water supply and requested documentation demonstrating compliance: (1) failure to maintain a record of the amount of anti-scalant used each week; (2) failure to verify the accuracy of manual disinfectant analyzers at least once every 90 days using chlorine solutions of known concentrations; (3) failure to calibrate the North well meter at least once every three years; and (4) failure to have successfully completed at least one executive director-approved training course or event specific to the operations and maintenance of reverse osmosis or nanofiltration membrane treatment. TCEQ also recommended using a separate tank inspection form for each of the ground and pressure tanks instead of a single form for both tanks. Inotiv immediately responded to the TCEQ’s requests and suggestion and provided documentation of corrective actions necessary to demonstrate compliance with the alleged violations: (1) revised the spreadsheet that documents reverse osmosis flow totals to include columns reflecting the amount of anti-scalant used each week; (2) began using a standard HACH DPD chlorine kit to test the DR300 chlorine meter for accuracy; (3) conducted a water flow bucket test to calibrate the North well meter, ordered and installed a new meter, and calibrated and tested the meter for accuracy; (4) provided the requisite training; and (5) documented tank inspections use separate forms for each tank. On September 19, 2025, Alice East received its TCEQ permit. On October 6, 2025, the TCEQ indicated that it had received all necessary documentation from Inotiv in response to these allegations.
5. Following a May 2025 extreme weather event in Alice, Texas, which produced unexpected winds ranging from 60 to 90 miles per hour, Inotiv employees worked in coordination with governmental authorities to protect animals at Inotiv sites in Alice. This included placing temporary tarps over outdoor field cage enclosures located at Alice East that had sustained damage to the shading in place to protect the animals from elevated temperatures and direct sunlight due to the storm. On July 3, 2025, employees found an NHP that had lodged its head in an opening in a tarp placed for shading over the animal’s enclosure. Veterinary staff concluded that the animal died from asphyxiation before it was discovered. An investigation determined that the animal tore a hole in the tarp between the daily PM welfare check performed on July 2 and the discovery of the deceased animal the following day. In response to this incident, Inotiv removed all temporary tarps from NHP enclosures and replaced them with new temporary shading composed of tin with wooden frames. The

site continues to work diligently to implement permanent repairs and structural improvements to the facilities damaged by the storms.

6. On July 28, 2025, while transferring NHPs from quarantine to animal housing facilities at Inotiv's "Alice West" site in Alice, Texas, an NHP escaped the animal transfer box into the enclosed loading dock area and was fatally injured by a rollup door. Investigations by both Human Resources and the IACUC found that animals were left unattended in their transfer boxes at various times during the transfer, an animal care technician who was notified of an empty transfer box failed to communicate the discrepancy or assess whether there was an escaped animal, and existing procedures for conducting transfers did not include clear controls for ensuring transfer boxes are properly secured, managing door security during transfers, and ensuring animals are not left unattended. The animal care technician was terminated, all animal care employees in Alice West were retrained, additional secondary secure latching mechanisms were added to animal transfer boxes, and procedures were revised to enhance controls in place during transfer.