IDEXX Laboratories, Inc.
Policy on Political Contributions and Public Policy Engagement

IDEXX Laboratories, Inc. is committed to being a good corporate citizen in every country in which we do business and fulfilling our Purpose – to be a great company that creates exceptional long-term value for our customers, employees, and shareholders by enhancing the health and well-being of pets, people, and livestock.

We believe that part of being a good corporate citizen is responsibly engaging with policy makers to educate them about, and advocate for, the public policy issues relevant to us, our stakeholders and the communities in which we do business. This Policy outlines how IDEXX Laboratories, Inc. and its subsidiaries (collectively, “IDEXX”) may engage in political processes and public policy activities in accordance with applicable laws and regulations, our Code of Ethics, our Global Anti-Bribery and Corruption Policy and our fundamental values and principles, and this Policy applies to IDEXX employees globally and other individuals and parties who act on behalf of IDEXX anywhere around the world.

IDEXX POLITICAL CONTRIBUTIONS AND EXPENDITURES

IDEXX will not use corporate funds, assets or anything of value to pay, support or oppose, directly or indirectly, or make independent political expenditures on behalf of or in opposition to, any political candidate or incumbent politician or any political party.

IDEXX does not have a political action committee.

Subject to pre-clearance from our Government Affairs team, IDEXX may, from time to time, use corporate funds to:

• Support or oppose local and state ballot initiatives, regulatory efforts and referendums that may impact our business, operations, Purpose or guiding principles, including through supporting political campaigns or political action committees; and

• Support entities organized under Internal Revenue Code Section 527 or Section 501(c)(4) (or similar entities outside the United States) that seek to influence an issue or policy that may impact our business, operations, Purpose or guiding principles.

All political contributions and expenditures by IDEXX will be made in compliance with applicable laws and regulations and reflect IDEXX’s interests and policy priorities. In addition, no political contribution or expenditure may be given, offered or promised to any person with the purpose or intent of improperly obtaining or retaining business or otherwise securing an improper advantage or inducing an illegal or unethical action (whether from that person or from anyone else).

TRADE ASSOCIATIONS

IDEXX holds memberships in a variety of industry, trade and business associations, and we believe that our participation in these associations make us more effective and broadens our perspective on public policy issues relevant to us, our stakeholders and the communities in which we do business. These associations may engage in lobbying or other political or public policy activities and advocate for certain regulatory reforms and policy positions. IDEXX may not support every policy position taken by these associations, and our membership should not be taken as an endorsement of all policy positions taken by these associations. Further, while these trade associations may use a portion of our fees for political contributions and expenditures, IDEXX is not involved in the allocation of these funds.

Effective Date: March 1, 2021
INDIVIDUAL POLITICAL ACTIVITIES

IDEXX encourages employees to civically engage in their communities, and employees’ personal political contributions, using personal funds, are not affected by this Policy.

Employees shall not be reimbursed directly or indirectly for any political contributions or expenditures, and IDEXX will never ask an employee to make a personal political contribution.

Decisions by employees to become involved in political activities are personal and voluntary. An employee’s political activities are required to be done on the employee’s own time and with the employee’s own resources. Employees may not use their position to coerce or pressure other employees to make contributions or to support or oppose candidates. In addition, when engaging in personal political activities, employees may not act in a manner that could cause someone to believe that their actions reflect the views or positions of IDEXX.

IDEXX GOVERNMENT AFFAIRS AND PRE-CLEARANCE PROCESS

IDEXX’s engagement in any and all political and public policy activities is managed by our Government Affairs team. Our Government Affairs team consults with our Legal and Compliance team to ensure that all of our political and public policy activities, including political contributions and expenditures by IDEXX, comply with all applicable laws and regulations and are consistent with our Code of Ethics and our applicable policies and guidelines. Our Government Affairs team also consults with our Regulatory Affairs from time to time, on an as-needed basis.

The following activities on behalf of IDEXX must be pre-cleared with the Government Affairs team before they occur:

- Use of corporate funds to support or oppose local and state ballot initiatives and referendums;
- Use of corporate funds to support Internal Revenue Code Section 527 or Section 501(c)(4) entities (or similar entities outside of the United States);
- Engagement or meeting with any government official, other than in regulatory meetings;
- Lobbying activities, including the hiring of political consultants;
- Grass-roots lobbying campaigns; and
- Participation in any trade association’s lobbying efforts.

OVERSIGHT

The IDEXX Board of Directors provides oversight over our policies, guidelines and practices related to IDEXX’s political and public policy engagement, including our political contributions and expenditures.

The Government Affairs team will periodically review the scope and content of this Policy, in consultation with the Legal and Compliance team, and issue updates (as necessary), and the Government Affairs team will provide periodic updates to the IDEXX Board of Directors.

Effective Date: March 1, 2021