



## Modern Slavery Statement 2017 and 2018

*This Statement is dated February 15, 2019 and describes the activities of IDEXX Laboratories, Inc. and its consolidated subsidiaries (“IDEXX,” “we,” “us” and “our”) to address slavery and human trafficking (“modern slavery”) in our business and supply chains during the years ended December 31, 2017 and 2018. We have published this Statement pursuant to the California Transparency in Supply Chains Act and the UK Modern Slavery Act. Not all of the entities in our consolidated group are subject to these acts. However, we have prepared this Statement on a consolidated basis for the entire IDEXX group because we have common policies and compliance procedures relating to modern slavery across our business.*

Our commitment to enhancing the health and well-being of pets, people and livestock and contributing to the health and quality of life of the communities in which we live and work is grounded in the belief that everyone should be treated fairly and with dignity. As such, we are committed to implementing policies and procedures that mitigate the risk of modern slavery in our business and supply chains.

### Overview

We develop, manufacture and distribute products and provide services primarily for the companion animal veterinary, livestock and poultry, dairy and water testing markets. We also sell a line of portable electrolytes and blood gas analyzers for the human point-of-care medical diagnostics market.

We believe that the risk of modern slavery in our own business is remote. We have personnel policies, procedures and training pertaining to, among other things, hiring practices, working hours and workplace conduct that we believe mitigate this risk in our own business.

In addition, we have not identified any instances of modern slavery at our vendors or in our supply chains. As discussed below, we have in place policies and procedures intended to mitigate these risks.

In 2017, we reviewed our policies and procedures relating to modern slavery, with a view to assessing whether any enhancements should be made. In connection with that review, we determined to adopt a Supplier Code of Conduct that covers, among other human rights issues, modern slavery. In 2018, we finalized the Supplier Code of Conduct and began the process of implementing that Supplier Code of Conduct among our suppliers.

### The IDEXX Code of Ethics

We are committed to fulfilling our Purpose – creating long-term value for our customers, employees and shareholders by enhancing the health and well-being of pets, people and livestock. An essential guiding principle of how we do this is by conducting our business with

the highest ethical standards and in strict compliance with the laws and regulations of all jurisdictions in which we do business. In addition, our employees are expected to avoid any activity that might reflect adversely on us.

Our fundamental values and business principles are described in our Code of Ethics (the “Code”), which applies to all of our employees worldwide and the members of the IDEXX Laboratories, Inc. Board of Directors. Among other things, the Code describes our policy of equal employment opportunity and our commitments to provide a respectful workplace that is free from discrimination and unlawful harassment and free from recognized safety and health hazards. The Code does not explicitly mention modern slavery. However, as noted in the Code, it is a guide and resource and is not intended to be all-encompassing. It is meant to be interpreted and followed in the context of applicable laws and regulations and good common sense. Failure to comply with the Code and related IDEXX policies may result in disciplinary action up to and including termination of employment.

New employees are provided with a copy of the Code upon hire. A copy of the Code is also available on the IDEXX intranet and is publicly available on our website. In addition, our employees are required to annually certify compliance with the Code.

### **Third Party Partners**

We expect our global business partners to conduct themselves in a manner consistent with the Code when acting for, on behalf of or in the name of IDEXX.

In addition, we have developed risk-based diligence and management processes, procedures and guidelines pertaining to our distributors and other similar third parties. These processes, procedures and guidelines are intended to, among other things, obtain assurance from third parties that they will conduct IDEXX business in accordance with our principles, including our overall commitment to ethical and lawful business practices. As part of our compliance procedures, we have adopted provisions for inclusion in our distribution agreements requiring distributors to certify that they have reviewed and will comply with the Code. We also have adopted provisions providing that all services performed by distributors are subject to audit by IDEXX in our sole discretion.

### **Vendor Relationships**

We also seek to conduct business with vendors who adhere to ethical business practices, act in an environmentally responsible manner, encourage workplace health and safety, adopt good human resources policies and practices and abide by all applicable laws. We predominantly use vendors located in the United States, Europe, Japan, South Korea and China. We conduct on-site audits at all of our vendors’ manufacturing sites located in regions that do not have a low prevalence of modern slavery based on publicly available third party indicators.

In addition, we have many long-term vendor arrangements, which we believe helps mitigate modern slavery risk.

**New Vendor Screening.** Before engaging a new vendor, we typically evaluate the vendor through a risk-based assessment process, which, depending upon the vendor's risk profile, may include steps to verify product supply chains to assess risk. The steps taken to assess risk at a vendor of materials or components may include a questionnaire, an audit of the vendor's facilities, quality systems and business practices and follow-up visits and reviews.

**Performance Reviews.** We seek continuous improvement in our supply chain. To that end, we monitor the business performance of our key vendors through periodic performance reviews and ongoing dialogue. As part of our performance reviews, we assess compliance with IDEXX standards. We also perform vendor audits, as discussed below.

**Vendor Audits.** We periodically audit vendors of materials and components and certain vendors of completed goods to confirm their compliance with our standards. Our personnel conduct verifications and factory audits. Audit findings and recommendations are discussed with the vendor. Vendors are expected to satisfactorily address any identified issues and demonstrate that corrective action has been taken.

**Vendor Agreements.** Our standard forms of vendor contracts and purchase order terms and conditions require the vendor to comply with all laws applicable to the supply of services or materials to IDEXX, including laws relating to modern slavery.

**Supplier Code.** As noted above, we have adopted a Supplier Code of Conduct (the "Supplier Code") that covers, among other labor and human rights issues, modern slavery and child labor. The Supplier Code has been developed based on the International Labour Organization's core conventions, the United Nations Guiding Principles on Business and Human Rights, and other industry best practices. Among other things, the Supplier Code (1) includes limitations on working hours and child labor, (2) requires that clear and complete employment-related information be provided to workers, (3) requires subcontracting be disclosed, (4) prohibits charging recruitment fees to workers, (5) requires that workers receive at least the minimum wage and legally mandated benefits, be paid on a timely basis and deductions, advances and loans from wages be made only as permitted by applicable law, (6) prohibits requiring workers to lodge deposits as a condition of employment or for other purposes, (7) indicates that suppliers' workplaces are expected to be free from harsh or inhumane treatment and discrimination, workers' freedom of movement is not to be restricted and workers must be free to organize and bargain collectively.

We have trained our relevant employees on the Supplier Code. We are in the process of distributing the Supplier Code to our current vendors based on the vendors' respective risk

profiles and plan to include the Supplier Code as part of our vendor training. Current vendors that have been assessed as meeting or exceeding a minimum risk threshold will also be required to certify that they have reviewed and will comply with the Supplier Code, and we will begin requiring all new vendors to do the same in 2019.

The Supplier Code is publicly available on our website at [www.idexx.com/en/about-idexx/corporate-governance/](http://www.idexx.com/en/about-idexx/corporate-governance/).

### **Grievance Reporting Mechanism/Whistleblower Hotline – IDEXX Ethics Hotline**

We maintain a confidential whistleblower hotline known as the “IDEXX Ethics Hotline” through which employees, vendors and other third parties may report violations of the Code and other matters. The contact information for the IDEXX Ethics Hotline is 1-800-836-2027 (United States) or [www.idexx.com/ethics-hotline](http://www.idexx.com/ethics-hotline). If individuals desire to call the IDEXX Ethics Hotline outside of the United States, local toll-free telephone numbers may be found at [www.idexx.com/ethics-hotline](http://www.idexx.com/ethics-hotline).

Solely for purposes of compliance with the UK Modern Slavery Act, this Statement has been approved by the IDEXX Laboratories Limited Board of Directors and signed by a director of that entity.

A handwritten signature in black ink, appearing to read 'Lily Joann Lu', with a long horizontal line extending to the right.

Name: Lily Joann Lu

Title: Director, IDEXX Laboratories Limited