Modern Slavery Statement – 2021

This Statement is dated 30 June 2022 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 year ended 31 December 2021. We have published this Statement pursuant to the California Transparency in Supply Chains Act, the UK Modern Slavery Act and the Australian Commonwealth Modern Slavery Act (each an “Act” and, together, the “Acts”). 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 operating responsibly and establishing and adhering to the highest ethical standards by implementing policies and procedures that mitigate the risk of modern slavery in our business and supply chains. Our approach to modern slavery compliance takes into account and consideration the principles of the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and other industry best practices as described below under the heading “Supplier Code of Conduct”.

Overview

We develop, manufacture and distribute products and provide services primarily for the companion animal veterinary, livestock and poultry, dairy and water testing sectors. We also sell point-of-care and laboratory diagnostics for the human medical diagnostics sector, including electrolyte and blood gas analyzers and a novel real-time PCR test to detect SARS-CoV-2 (COVID-19).

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, in 2021, as in prior years, we have not identified any instances of modern slavery at our suppliers or in our supply chains as no modern slavery or human rights issues have been reported to us via our grievance reporting mechanism or IDEXX Ethics Hotline. Our ongoing monitoring of publicly available news sources has not yielded modern slavery or human rights concerns related to our suppliers or in our supply chain. As discussed below, we have in place policies and procedures intended to mitigate these risks.
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 seeking to conduct 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. The Code takes a principles-based approach and is meant to be interpreted and followed in the context of applicable laws and regulations. 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.

Risk Identification, Assessment, Management and Due Diligence

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.

Supplier Relationships

We also seek to conduct business with suppliers 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 suppliers located in the United States, Europe, Japan, South Korea and China. We conduct on-site audits, or appropriate risk-based assessments, at all of our suppliers’ manufacturing sites located in regions that do not have a low prevalence of modern slavery based on publicly available third-party indicators. On an ongoing basis, we monitor publicly available news sources for any allegations of modern slavery or other human rights issues at our critical suppliers and partners. Under our internal procedures, any human rights concerns are to be investigated.

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

**New Supplier Screening.** Before our procurement team engages a new supplier, we typically evaluate the supplier through a risk-based assessment process, which, depending upon the supplier’s risk profile, may include steps to verify product supply chains to assess risk. The steps taken to assess risk at a supplier of materials or components may include a questionnaire, an audit of the supplier’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 suppliers through periodic performance reviews and ongoing dialogue. As part of our performance reviews, we assess compliance with IDEXX standards. We also perform supplier audits, as discussed below. The information learned through performance reviews is used to assess the effectiveness of our compliance program. Additional actions we take to assess the effectiveness of the actions being taken to assess and address modern slavery risks are described later in this Statement.

**Supplier Audits.** We periodically audit suppliers of materials and components for instruments and certain suppliers 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 supplier. Suppliers are expected to satisfactorily address any identified issues and demonstrate that corrective action has been taken. The supplier audit process is periodically reviewed for improvements and effectiveness.

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

**Supplier Code of Conduct.** We have 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 was 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 to 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 that 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, (8) prohibits workers’ freedom of movement from being restricted and (9) requires that workers be free to organize and bargain collectively.

We train our relevant employees on the Supplier Code. We also distribute the Supplier Code to new suppliers based in North America and to other critical suppliers worldwide and require them to certify that they have reviewed and will comply with the Supplier Code.


Grievance Reporting Mechanism/Whistleblower Hotline – IDEXX Ethics Hotline

We maintain a confidential whistleblower hotline, known as the “IDEXX Ethics Hotline,” through which employees, suppliers 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. 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. IDEXX has a no retaliation policy for good faith reporting.

The IDEXX Ethics Hotline is managed by a third-party vendor that provides toll-free 24/7 telephone helplines worldwide and web-based reporting tools in the reporters’ respective local languages. The availability of the IDEXX Ethics Hotline is promoted globally via on-line and in-person trainings. Reporters can submit their questions and concerns with their names or anonymously, subject to local legal restrictions. When reporters submit concerns through the IDEXX Ethics Hotline, they receive an immediate acknowledgment of receipt and are able to track the status of their reported concerns. All incoming matters are reported to the Compliance team, regardless of how they are reported, and are tracked, triaged, and referred for review.

We also have a Global Whistleblower Policy, which supplements our Code and is available on our website. Our Global Whistleblower Policy clearly describes how any current or former employee or business partner may report ethical or other concerns. It also describes our strict non-retaliation policy and sets forth our commitment to the proper handling of all reported concerns.

Our Ongoing Commitment

We remain committed to respecting human rights across our business and implementing policies and procedures that mitigate the risk of modern slavery in our business and supply chains. We will continue periodically to review our policies and
procedures to identify and evaluate potential opportunities to further mitigate the risk of modern slavery in our business and supply chains.

Certification – UK Modern Slavery Act

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, on 30 June 2022. IDEXX Laboratories Limited is the only IDEXX entity subject to the UK Modern Slavery Act.

Name: Lily Joann Lu
Title: Director, IDEXX Laboratories Limited
Certification – Australian Commonwealth Modern Slavery Act

IDEXX Laboratories Pty. Limited is required to submit a Statement pursuant to the Australian Commonwealth Modern Slavery Act. Solely for purposes of compliance with the Australian Commonwealth Modern Slavery Act, this Statement has been approved by the IDEXX Laboratories Pty. Limited Board of Directors and signed by a director of that entity, on 30 June 2022. No other entity for the 2021 reporting period is subject to the Australian Commonwealth Modern Slavery Act.

IDEXX Laboratories Pty. Limited is a distributor of the IDEXX products and provides the IDEXX services described earlier in this Statement. IDEXX Laboratories Pty. Limited has operations throughout Australia and is a wholly-owned subsidiary of IDEXX Laboratories, Inc. As of 31 December 2021, IDEXX Laboratories Pty. Limited has 298 employees. IDEXX Laboratories Pty. Limited does not have an ownership interest in or control any other entities.

IDEXX’s, including IDEXX Laboratories Pty. Limited’s, supply chain is discussed earlier in this Statement. The areas we identified as having the lowest risk of modern slavery are local operations handled by staff directly employed by IDEXX Laboratories Pty. Limited. We believe its highest risk area relates to its supply chains, in particular that forced labor could occur without our knowledge in violation of our policies in upper tiers of the supply chain from which we may be several or more levels removed. Where we have identified modern slavery risks in our supply chain, we have established procedures intended to mitigate the risks of either contributing to or being linked to adverse impacts resulting from modern slavery. We seek to address modern slavery risk through the policies, procedures (e.g., screenings, performance reviews, audits, grievance mechanisms) and other measures described earlier in this Statement. We assess the effectiveness of the actions being taken to assess and address modern slavery risks through review of: the number of supplier performance reviews and audits performed; the findings of supplier performance reviews and audits; the implementation of any required corrective action plans; and by the number and type of complaints received through our grievance reporting mechanism.

Name: Lily Joann Lu
Title: Director, IDEXX Laboratories Pty. Limited