

Labcorp Lobbying and Political Contributions Policy

Introduction and General Statement of Policy

Labcorp (Company) and its subsidiaries participate in the development of public policy to protect and advance the Company's interests and in doing so further the Company's mission to improve health and improve lives. The Company accomplishes this objective through government relations activities including monitoring and analyzing relevant legislative and regulatory developments to establish public policy positions for the Company; advocacy of the Company's public policy positions through interactions with government officials, directly or through trade associations, coalitions, or other third parties; operation of a political action committee (PAC) in the United States (U.S.) to support candidates for public office that are supportive of the Company's objectives; and related activities.

In doing so, Labcorp is committed to compliance with all applicable laws and regulations and internal Company policies, including but not limited to the *Labcorp Code of Conduct and Ethics*; the *Labcorp Business Practices Manual* and its *Anti-Corruption Policy* and *Foreign Third Party Due Diligence Policy*; and the *Labcorp Corporate Charitable Contributions Policy and Procedures*. All such government relations activities on behalf of the Company are to be conducted by, coordinated through, or performed in cooperation with or at the request of, Labcorp's Global Government Relations and Public Policy Department (Department), in accordance with the *Labcorp Government Relations Policy and Procedures* and this Policy.

Lobbying

The Company's efforts to influence public policy in a favorable manner involve a number of government relations activities, some of which are defined as "lobbying" under applicable laws. The Department engages in lobbying activities through direct in-person meetings with legislative and administrative officials and through direct email and telephone contacts. In addition, the Department engages lobbying firms to assist in scheduling and attending meetings with government officials; monitoring legislative and regulatory developments and providing political intelligence and policy research; developing strategy; and preparing associated materials. All lobbying activities for the Company are to be conducted by, coordinated through, or performed in conjunction with or at the request of the Department, as further described in the *Labcorp Government Relations Policy and Procedures*.

The Department also participates in and coordinates Company involvement in various trade associations that represent the interests of the industries in which the Company operates, such as the American Clinical Laboratory Association (ACLA); the Association of Clinical Research Organizations (ACRO); and the National Association for Biomedical Research (NABR). Further, the Company is a member of certain cross-industry coalitions that focus on advocacy related to

particular issues, such as the Personalized Medicine Coalition (PMC) and the Diagnostic Test Working Group (DTWG).

Political Contributions

In the U.S., corporate political donations to federal candidates and committees are prohibited by law, and the Company makes no such contributions. Although permitted by law, as a matter of corporate policy, corporate and PAC funds are not used for political independent expenditures. It is also Labcorp's policy not to use corporate or PAC funds to contribute to 501(c)(4) social welfare organizations. Corporate political donations to state candidates and committees are permitted under some state laws under limited circumstances, but are rarely approved as a matter of Company policy. No such contribution is made without prior approval from the Department and such other corporate approvals as may be necessary.

Unless authorized by the Department, an individual may not make any political contribution as a representative of Labcorp. To the extent permitted by law and Company policy, authorized personnel may participate in political fundraising activities in the U.S. involving contributions to political candidates and committees by the Laboratory Corporation of America Holdings Political Participation Committee (Labcorp PAC).

Political donations to federal and state candidates and political committees in the U.S. can be made through Labcorp PAC, as discussed further below. All requests for political donations from the Company to persons or entities outside the U.S. must be submitted to the Department for approval in advance of the donation. The Department confers with the Corporate Compliance Department to determine whether the donation is permissible under applicable law and appropriate to achieve legitimate Company objectives.

Labcorp PAC is a voluntary, non-profit, unincorporated political association qualifying as a separate segregated fund, as that term is used in the Federal Election Campaign Act. Labcorp PAC's connected organization is Laboratory Corporation of America Holdings (Labcorp). Labcorp PAC is independent of, and not affiliated with, any political party, candidate for elective office, or other political organization.

The purposes of Labcorp PAC are to facilitate the effective citizenship of participants in Labcorp PAC, through their financial participation in the elective process, and to assist in the nomination and election of candidates for federal, state and local office who will support integrity in government and will protect and advance the interests of the Company, its subsidiaries and affiliates, and their respective employees and shareholders.

Under its Bylaws, Labcorp PAC is governed by the Labcorp PAC Executive Committee consisting of three or more Company executives and by officers appointed by the Labcorp PAC Executive Committee, including a Chair, Vice Chair, Treasurer, Secretary, and Custodian of Records. The Bylaws authorize the Labcorp PAC Executive Committee to establish and implement policies and procedures for soliciting contributions. The Labcorp PAC Executive Committee has established

Guidelines for soliciting contributions to Labcorp PAC that limit solicitations to executive and administrative personnel as defined under Federal Election Commission (FEC) regulations. The Labcorp PAC Executive Committee has also established guidelines for contributions to candidates and political committees, to support candidates on a non-partisan, bicameral basis in the best interests of the Company, prioritizing contributions to candidates and political committees identified as supportive of the Company's business objectives.

Labcorp PAC reports its receipts and expenditures as required under FEC regulations. The reporting frequency varies depending upon whether the reporting period is during an election year and whether a quarterly or monthly reporting schedule is elected. Labcorp PAC also files periodic reports with the NC State Board of Elections as required by NC law.