

Policy Regarding Corporate Political Contributions

Adopted September 9, 2015

Express Scripts Corporate Contribution Disclosure Policy

Under federal law, corporations cannot support candidates for federal office. However, many states allow corporate donations to state and local candidates or to ballot-issue campaigns. Express Scripts Holding Company, its subsidiaries and affiliates (“Express Scripts”) often makes direct contributions to support candidates in those states where such corporate political contributions are allowed by law and may also make indirect contributions, such as hosting a reception and paying expenses associated with the event. Contributions are made considering factors such as the candidate’s: (i) support for public policy that promotes private competition, choice and free markets in the delivery and financing of health care; (ii) support for important tools pharmacy benefit managers employ to make prescription drugs safer and more affordable; (iii) support for positions on issues important to Express Scripts and its plan sponsors and patients; (iv) demonstrated leadership on key committees of importance to our business; and (v) representation of a state or district where Express Scripts has a large concentration of associates and/or customers.

Throughout the year, Express Scripts’ management may make recommendations for corporate political contributions. Each corporate political contribution goes through a legal approval process. In making corporate political contributions, Express Scripts complies with all disclosure requirements as prescribed by state and federal law. All contributions shall be made in an effort to promote the interests of the Company without regard for the private political preferences of employees. The Company reports its corporate political contributions annually to the Corporate Governance Committee of the Express Scripts Board of Directors.

On a semi-annual basis, Express Scripts will disclose its corporate political contributions on its corporate website. The contribution listing will include contributions made during the covered period to political candidates, political parties, political committees, ballot measures and other political entities organized and operating under 26 USC Section 527 of the Internal Revenue Code.