

Express Scripts Holding Company
Policy Regarding Lobbying Activities

Adopted September 9, 2015

As a leading company in the healthcare industry, it is essential and appropriate for Express Scripts Holdings Company (the “Company”) to participate constructively and responsibly in the political process. Lobbying activities are a form of communication necessary to ensure those who construct and enact legislation and policy clearly understand the issues affecting the healthcare industry.

The Company will at all times interact with government officials in a respectful manner, shall provide factual, accurate information in explaining issues or taking positions and shall at all times comply with all applicable federal, state and local laws, rules and regulations.

Employees shall not offer or provide gifts or articles of value to any governmental officials in exchange for or in anticipation of any actions. All contributions and expenditures shall be made in an effort to promote the interests of the Company and without regard for the private political preferences of employees. Nominal expenditures for incidental entertainment (meals, etc.) may be made, but are limited by applicable federal, state and local laws, rules and regulations.

The Vice President of Government Relations shall submit a report at least annually to the Corporate Governance Committee of the Board of Directors with respect to the Company’s lobbying activities. Such reports shall include detailed information about lobbying expenditures and trade association memberships.